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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**I. PUBLIC SERVICES**  
**1. FIRE PROTECTION**

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**1. INTRODUCTION**

This section analyzes the proposed project's impacts relative to the fire protection and emergency medical services provided by the City of Los Angeles Fire Department (LAFD). The analysis addresses fire protection facilities, services, and response times, emergency access, and fire flow, based on input provided by the LAFD Planning Section and Bureau of Fire Prevention and Public Safety.

**2. ENVIRONMENTAL SETTING**

**a. Regulatory Framework**

**(1) City of Los Angeles**

**(a) Los Angeles General Plan Framework**

The Infrastructure and Public Services Chapter of the Citywide General Plan Framework sets goals, objectives, and policies for fire protection and emergency medical services in the City of Los Angeles. Objectives and policies have been established in accordance with Goal 9J of the Infrastructure and Public Services Chapter, which is to ensure that every neighborhood has the necessary level of fire protection service, emergency medical service, and infrastructure. Under the General Plan Framework, the City standard for both fire protection and emergency medical service response distance is 1.5 miles.<sup>157</sup>

**(b) General Plan Safety Element**

The General Plan Safety Element, adopted on November 26, 1996, replaces the 1975 General Plan Safety Element and the 1979 Fire Protection and Prevention Element. It contains policies related to the City's response to hazards and natural disasters. Policy 2.1.6 requires the LAFD to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate

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<sup>157</sup> *City of Los Angeles General Plan Framework, page 9-5.*

effective fire suppression including peak load water flow and building and fire code regulations. In addition, the LAFD is required to revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities, based on flow, intensity, and type of land use, life hazards, occupancy, and degree of hazards, to provide adequate fire and emergency medical service response.

**(c) Los Angeles Municipal Code and Charter**

As detailed in the Fire Protection and Prevention Chapter of the Los Angeles Municipal Code (LAMC) Article 7 (Fire Code), the LAFD Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The Fire Code also provides regulations for the prevention of fires, the investigation of fires or life safety hazards, the elimination of fire and life safety hazards in any building or structure including buildings under construction, the maintenance of fire protection equipment and systems, and the regulation of the storage, use, and handling of hazardous materials.<sup>158</sup>

Section 520 of the Los Angeles City Charter requires the LAFD to control and extinguish injurious or dangerous fires and remove that which is liable to cause those fires; enforce all ordinances and laws relating to the prevention or spread of fires, fire control and fire hazards within the City; conduct fire investigations; and protect lives and property in case of disaster or public calamity.

Division 118 of the Fire Code requires that all new high-rise buildings greater than 75 feet in height include a fire control station containing a public address system and telephones for LAFD use. The fire control station must contain a fire detection and fire alarm system, an elevator recall switch and status panel for all elevator cars, a sprinkler control system, standby power and emergency electrical power controls, controls for unlocking stairshaft doors, smoke evacuation and fan controls, stairway pressurization control switches, and status indicators for fire pumps and water supply. A sound-powered telephone communication system must be located at every floor level in each enclosed exit stairway, at every exterior location where an enclosed stairway exits to a public way, on the roof, and in every elevator car. In addition, a high-rise building must have at least one emergency and fire control elevator in each bank of elevators (Sec. 57.118.05), a dependable method of sounding a fire alarm throughout the building (Sec. 57.118.06), an emergency smoke control system (Sec. 57.118.07), a standby and emergency power system (Sec. 57.118.08), stairshaft doors for fire department use (Sec. 57.118.09), pressurized stairshafts (Sec. 57.118.10), and other devices operable from the fire control station, as previously listed. Division 118 also requires the installation of automatic

<sup>158</sup> *City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02, Amended in Entirety, Ordinance Number 162,123, effective May 12, 1987.*

sprinkler systems in all new high-rise buildings in addition to a rooftop emergency helicopter landing facility on each building in a location approved by the Chief of the LAFD.

Fire Code Division 119 requires an annual inspection of high-rise buildings including an evaluation of physical access, property condition, and all fire-safety facilities and equipment required under the LAMC Fire and Building Codes. Automatic fire extinguishing systems are inspected every six months by the LAFD. Annual fire safety inspections include fire warning systems, central station signaling systems, smoke management systems, elevators, emergency generator and lighting systems, fire doors, fire pumps, pressure reducing valves, and fire escapes. Under LAMC Chapter 9, Section 91.905.15, all smoke control systems shall be tested prior to the issuance of a Certificate of Occupancy and, after occupancy of the building, all operating parts of the smoke-control systems shall be retested every six months in accordance with the retest requirements established by the Department of Building and Safety and the LAFD.

The LAFD Bureau of Fire Prevention and Public Safety also administers guidelines for the Sequence of Operations for Life Safety Systems in High-Rise Buildings. These guidelines address the management of life safety systems and facilities, including a sequence of procedures involving monitoring and management of audible and visual alarm signals; elevator lobby smoke detectors; duct smoke detectors; elevator shaft smoke/heat detectors; sprinkler valve flow switches; and smoke/fire dampers on each floor. Stairway numbering on each floor, roof access, and fire safety signage on all floors in prescribed locations are also required.

Fire Code Division 9 addresses fire access, hydrants, and fire flow requirements. Under Division 9 (Sec. 57.09.03), an approved posted fire lane is to be provided for any portion of an exterior wall more than 150 feet from the edge of a roadway. Division 9 (Sec. 57.09.06) establishes fire flow standards. Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. The determination of fire flow adequacy is determined by the type of land use with high-density land uses requiring higher flows from a greater number of hydrants. The fire flow required for high-density residential buildings is 4,000 gpm from four adjacent hydrants flowing simultaneously. The fire flow required for high-density commercial or industrial buildings is 12,000 gpm available to any block. A minimum residual water pressure of 20 pounds per square inches (psi) is required to remain in the water system in addition to the required gpm water flow. Section 57.09.06 of the Fire Code limits the maximum response distance from a high-density residential development and high-density commercial or industrial development to a fire station to 1.5 miles and 1.0 mile, respectively. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. The Chief of the LAFD may also require the provision of additional fire protection. Fire hydrant spacing and hydrant type is also determined according to land use. For high-density residential uses, one hydrant per 100,000 square feet of land is required with a 300 to 450 feet distance between hydrants. For industrial and commercial uses, one hydrant per

80,000 square feet is required with 300 feet between hydrants. Furthermore, every first story of a residential unit and all first story portions of any commercial or industrial building must be within 300 feet of an approved hydrant. Division 9 (Sec. 57.09.08) also provides for supplemental fire protection in which equipment and systems not otherwise required in the LAMC may be required by the LAFD.

**(d) City of Los Angeles Fire Facilities Bond (Proposition F)**

The City of Los Angeles Fire Facilities Bond (Proposition F) was approved by voters in November 2000. This bond allocates \$378.6 million of general allocation funds to build 18 new or replacement neighborhood fire/paramedic stations, one new satellite station (San Pedro Fire Station No. 36), and to expand and replace the emergency air operations and helicopter maintenance facility at the Van Nuys Airport (Fire Station No. 114).

Of the 20 Proposition F projects, the construction of seven new or renovated stations, including Fire Station No. 89 in North Hollywood, Fire Station No. 77 in Sun Valley, Fire Station No. 83 in Encino, Fire Station No. 5 in Westchester, Fire Station No. 65 in Watts, and Fire Station No. 59 in West Los Angeles were completed between December 2004 and August 2006. Fire Station No. 59, located at 11505 W. Olympic Boulevard, is the only West Los Angeles fire station to be renovated under Proposition F. Construction for the remaining 14 fire stations is scheduled for completion between October 2006 and December 2008.<sup>159</sup>

Measure J, which was approved by voters at the November 7, 2006 County State General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Currently under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least two acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Measure J allows new regional fire stations funded by Proposition F located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.<sup>160</sup>

<sup>159</sup> Los Angeles Fire Department, <http://lafd.blogspot.com/2006/10/lafd-fire-station-construction-update.html>, October 16, 2006.

<sup>160</sup> [http://lavote.net/VOTER/PDFS/ELECTION\\_RELATED/11072006\\_MEASURES\\_ON\\_BALLOT.pdf](http://lavote.net/VOTER/PDFS/ELECTION_RELATED/11072006_MEASURES_ON_BALLOT.pdf), Los Angeles County Registrar-Recorder/County Clerk, October 16, 2006.

## (2) State of California

The California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards, authorized by the California legislature, not covered by the national model code. Typical fire safety requirements of the CBC include the installation of sprinklers in all high-rise buildings, the establishment of fire resistance standards for fire doors, building materials, and particular types of construction, and the clearance of debris and vegetation within a prescribed distance from occupied structures. The CBC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific CBC regulations have been incorporated by reference in the Los Angeles Building Code Fire Safety Regulations. Chapter 7 of the CBC is incorporated by reference in Chapter 9 (Section 91.700) of the LAMC regarding the use of fire-resistant building materials, fire suppression systems, and other fire safety elements related to the design and construction of high-rise buildings. Chapter 9, Section 905 of the CBC is incorporated by reference in Chapter 9 (Section 91.900) of the LAMC regarding fire protection systems.

### b. Existing Conditions

#### (1) Fire Protection Facilities, Services, and Response Times

In accordance with the Los Angeles Charter Section 520, fire prevention, fire suppression, and life safety services within the City of Los Angeles are provided by the LAFD. The LAFD is a full-spectrum life safety agency that provides fire protection and emergency medical services to a population of approximately 4 million people throughout the City of Los Angeles. The LAFD's 3,562 uniformed personnel provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. At any given time, there are a total of 1,091 uniformed firefighters, including 223 paramedics, on duty at 103 fire stations across the LAFD's 470 square mile jurisdiction. These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions. The LAFD also employs 338 non-sworn technical and administrative support personnel.<sup>161</sup>

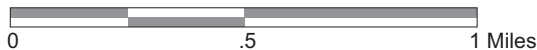
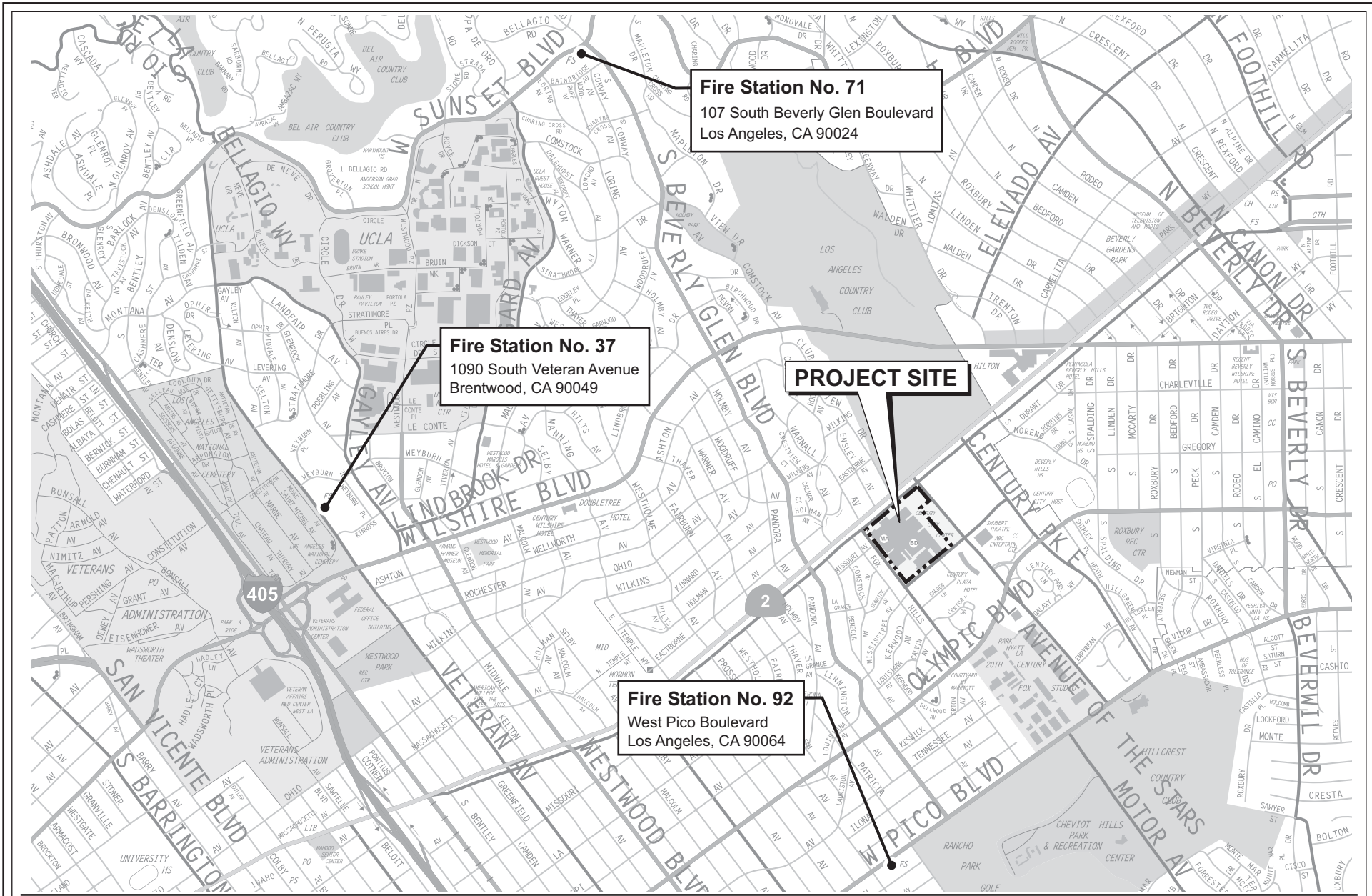
<sup>161</sup> <http://www.lafd.org/about.htm>, Los Angeles Fire Department, October 3, 2006.

As shown in Figure 54 on page 490, there are three LAFD fire stations located in the vicinity of the project site. The location, distance from the project site, response time to the site, staffing, and equipment of each of these fire stations are summarized in Table 39 on page 491. As shown in Table 39, Fire Station No. 92 at 10556 West Pico Boulevard in Century City is located closest to the project site. At a distance of approximately 1.4 street miles and a response time of approximately 5.2 minutes, Fire Station No. 92 would likely be the first to respond to the project site in the event of an emergency and would thus be designated the “first-in” station. The “first-in” districts are determined by the response time and distance between the site and the City’s fire station. “First-in” district boundaries are generally located at halfway points between two stations.<sup>162</sup> “First-in” districts are also based on the land use contained within the district, since the demand for services and response times can vary depending on population density, traffic, building types, and uses. The “first-in” district served by Fire Station No. 92 includes the communities of Century City, Rancho Park, and Cheviot Hills and is generally bounded by Santa Monica Boulevard and a portion of the Los Angeles Country Club Golf Course on the north, the City of Beverly Hills boundary on the east, National Boulevard on the south, and the San Diego Freeway on the west.

“Second call” stations are fire stations located in adjacent districts that support the “first-in” station. As shown in Table 39 Fire Station Nos. 71 and 37 would be designated as “second call” stations to support Fire Station No. 92 in the event of an emergency at the project site. Fire Station Nos. 71 and 37 are located approximately 2.3 and 2.4 street miles from the project site with response times of 6.4 and 7.0 minutes, respectively. In the event that additional response teams are needed during a major emergency, third response fire protection and emergency medical services would be provided by other fire stations within the LAFD system in the surrounding West Los Angeles and Century City area, including Fire Station No. 59 located at 11505 West Olympic Boulevard.

Table 40 on page 492 provides a listing of the daily and yearly average emergency medical service and fire incidents for each of the three fire stations located near the project site. Emergency medical service is divided into two separate categories: basic life support and advanced life support. Basic life support emergency medical service comprises approximately 25 percent of total emergency medical service calls. Basic life support includes a truck, an ambulance, and services of an emergency response technician, but does not require the use of paramedics. Advanced life support emergency medical service makes up the remaining 75 percent of emergency medical service calls. Advanced life support includes a truck, an ambulance, and a qualified (rated) paramedic. The paramedic rating is based on advanced technical training and hours of experience. The fire incidents listed in Table 40 refer to fire calls, including building fires; smoke; traffic accidents not requiring emergency medical

<sup>162</sup> *The midway points are determined according to response times to specific “Z” points (points placed 500 feet apart on a grid).*



Source: PCR Services Corporation, 2007.

Figure 54  
Fire Stations Located in the  
Vicinity of the Project Site



Table 39

## Fire Stations Located in the Vicinity of the Project Site

<b>Station No./Location</b>	<b>Distance From Project Site<sup>a</sup></b>	<b>Approximate Response Time To Project Site</b>	<b>24-Hour Staffing</b>	<b>Equipment</b>
<b>Fire Station No. 92</b> 10556 W. Pico Blvd. Century City	1.4 miles	5.2 minutes	12	Truck and Engine Company Fire Engine Paramedic Rescue Ambulance
<b>Fire Station No. 71</b> 107 S. Beverly Glen Blvd. Holmby Hills	2.3 miles	6.4 minutes	6	Fire Engine Paramedic Rescue Ambulance
<b>Fire Station No. 37</b> 1090 S. Veteran Ave. Westwood	2.4 miles	7.0 minutes	14	Truck and Engine Company Fire Engine Paramedic Rescue Ambulance

<sup>a</sup> All distances calculated from 10250 Santa Monica Boulevard.

Source: Fax dated August 10, 2006, from William N. Wells, Captain II-Paramedic with the Los Angeles Fire Department's Planning Section.

service; trash and vehicle fires; and responses to fire alarms, elevator rescues, and similar emergencies. As indicated in Table 40, the average number of total daily incidents (emergency medical service and fire incidents) for the three fire stations ranges from 3.6 to 13.6 incidents. Table 40 also lists the average response times to these incidents for each fire station. As shown, average response times range from 5.2 to 6.6 minutes.

## (2) Emergency Access

The project site is accessible by emergency vehicles via a number of major roadways serving the project site (i.e., Santa Monica Boulevard, Avenue of the Stars, Century Park West, and Constellation Boulevard). Fire Station No. 92 accesses the project site via Century Park West. Fire Station No. 71 accesses the project site from Beverly Glen Boulevard and Santa Monica Boulevard, and Fire Station No. 37 accesses the project site from Santa Monica Boulevard. Emergency access within the project site is currently provided via a number of driveways that surround the project site.

## (3) Fire Flow

Water for fire purposes is supplied to the project site via existing City of Los Angeles Department of Water and Power (LADWP) water mains located under adjacent streets. There is



**Table 40**  
**Fire and Paramedic Incident Data**

Fire Station	Number of Emergency Incidents		
	Daily Average <sup>a</sup>	Yearly Average <sup>b</sup>	Average Response Time
<b>Fire Station No. 92</b>			
Basic Life Support EMS	1.3	474.5	6.1
Advance Life Support EMS	3.9	1,423.5	6.1
Fire Incidents	2.2	803	5.2
<b>Total Station Incidents</b>	<b>7.4</b>	<b>2,701</b>	
<b>Fire Station No. 71</b>			
Basic Life Support EMS	0.6	219	6.6
Advance Life Support EMS	1.9	693.5	6.6
Fire Incidents	1.1	401.5	6.0
<b>Total Station Incidents</b>	<b>3.6</b>	<b>1,314</b>	
<b>Fire Station No. 37</b>			
Basic Life Support EMS	2.4	876	5.6
Advance Life Support EMS	7.2	2,628	5.6
Fire Incidents	4.0	1,460	5.8
<b>Total Station Incidents</b>	<b>13.6</b>	<b>4,964</b>	

<sup>a</sup> Based on statistics of daily incidents for the second quarter of 2006 (April-June).

<sup>b</sup> Yearly average obtained by multiplying the daily average by 365 days.

Source: Fax dated August 10, 2006, from William N. Wells, Captain II-Paramedic with the Los Angeles Fire Department's Planning Section.

a 12-inch water main in Santa Monica Boulevard, a 12-inch water main in Avenue of the Stars, a 12-inch water main in Century Park West, and an 8-inch water main in Constellation Boulevard, all adjacent to the project site. A total of eight fire hydrants are currently located along the perimeter of the project site. Specifically, two fire hydrants are located along Avenue of the Stars near the southeast corner of the project boundary, three fire hydrants are located along Constellation Boulevard (two near the commercial retail uses and one near the office building), and three fire hydrants are located along Century Park West (one near the surface parking lot and two near the commercial retail uses). Based on preliminary discussions with LADWP, existing fire flow to the project site is approximately 9,000 gpm.<sup>163</sup>

<sup>163</sup> Email correspondence with Larry Gray, Project Engineer, SEC Civil Engineers, Inc., December 11, 2006.

### 3. PROJECT IMPACTS

#### a. Methodology

Fire service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the proposed project.<sup>164</sup> Changes in these factors resulting from the proposed project may increase the demand for services. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis to review a project's emergency features and to determine if a proposed project would require additional equipment, personnel, or facilities. Beyond the standards included in the Los Angeles Fire Code, consideration is given to the size of a project, uses proposed, fire-flow necessary to accommodate the project, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and the project's potential to use or store hazardous materials.

#### b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006)*, a significant impact to fire protection services would occur if the proposed project would:

- Require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

#### c. Project Design Features

The proposed project would comply with all applicable State and local codes and ordinances found in the Safety Plan of the City of Los Angeles General Plan C.P.C. 19708. The project would also comply with the Department of Public Works Standard Plan S-470-0 regarding the standard street dimensions related to private development, and all applicable high-rise construction requirements set forth in the LAMC, including Chapter 9 (Building Code), and Chapter 5, Article 7 (Fire Code). In regard to Division 7 of the Building Code, the project would comply with all fire safety requirements related to provision of fire-resistant building materials and smoke control.

The proposed project would provide emergency vehicle access to the project site subject to the approval of the LAFD. The Applicant has been coordinating with LAFD during the development of the project plans in order to ensure that emergency vehicles and equipment

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<sup>164</sup> *City of L.A. CEQA Thresholds Guide (2006)*.

would be accessible to the proposed residential and shopping center uses. In addition, consistent with the requirements of the Fire Code, including Division 118, the project would provide one emergency and fire control elevator in each bank of elevators, an emergency smoke control system, a standby and emergency power system, and a dependable alarm system. The building design would include stairshaft doors for fire department use and pressurized stairshafts. In compliance with Division 118 (Sec. 57.118.11) and LAFD Standard No. 59, the project would also include an automatic sprinkler system throughout the residential and commercial buildings and subterranean garage area. To comply with Fire Code requirements, smoke detectors would also be maintained in all residential units and public areas. Additionally, in compliance with Fire Code Division 33 (Sec. 57.33.17) stairways would be numbered on each floor, and fire safety signage on all floors would be placed in required locations. In case of fire emergencies, access to the roof would also be available.

The proposed high-rise tower at the northeast corner of the project site would consist of 49 stories with four levels of subterranean parking below. The above grade levels would include up to four levels of retail uses with residential uses and associated amenities comprising the remaining levels. The building would be approximately 587 feet above ground-level and thus exceeds the 75-foot threshold set by the Fire Code. As such, in accordance with Fire Code Division 118 (Sect. 57.118.12) and in compliance with guidelines of LAFD Standard No. 54 “Helicopter Design”, a rooftop emergency helicopter landing facility in a location approved by the Fire Chief will be provided. The 1930 Century Park West office building would be developed into a five-story parking structure with two subterranean parking levels, and would be approximately 45 feet in height as measured from the plaza level. This structure would not exceed the 75-foot threshold set forth by the Fire Code.

#### **d. Analysis of Project Impacts**

##### **(1) Construction**

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services. Construction activities may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response, and private fire monitoring personnel would be trained with regard to the sequence of operations guidelines, which include, but are not limited to, the management of life safety systems and facilities, including a sequence of procedures involving monitoring and management of audible and visual alarm signals, elevator lobby smoke detectors, duct smoke detectors, elevator shaft smoke/heat detectors, sprinkler valve flow switches, and smoke/fire dampers on

each floor in the event of an emergency. Fire suppression equipment specific to construction would be maintained on-site. Project construction would comply with applicable existing codes and ordinances, in which additional demand on fire services would not exceed the current capabilities of the LAFD. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Construction-related traffic on adjacent streets could potentially affect emergency access to the project site. Construction activities may involve temporary lane closures for utility construction (generally only one lane so through access on all roadways serving the project site would be maintained). Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction (i.e., for the movement of construction equipment, and hauling of demolition and graded materials). As such, construction activities could increase response time for emergency vehicles to local businesses on Santa Monica Boulevard, Avenue of the Stars, Century Park West, and Constellation Boulevard, due to travel time delays to through traffic. However, as discussed in Section IV.J., Traffic and Circulation, the proposed project would require implementation of a Construction Staging and Traffic Management Plan. Upon implementation of this plan, traffic impacts from construction activity would be less than significant. Therefore, construction-related traffic impacts to emergency access would be less than significant.

## (2) Operation

As previously discussed, Fire Station No. 92 is located closest to the project site and would be the “first-in” station to respond to an emergency. Fire Station No. 92 is equipped with a Truck and Engine Company, Fire Engine, and Paramedic Rescue Ambulance and is staffed with 12 employees on a 24-hour basis. As shown in Table 40, Fire Station No. 92 averages 2,701 incidents per year. Based on City of Los Angeles Planning Department 2005 population data, the population served by Fire Station No. 92 in 2005 was approximately 36,767 persons.<sup>165</sup> By dividing the number of annual incidents by the population of the district, a generation factor of 0.0735 annual incidents per capita was derived. The project would generate approximately

<sup>165</sup> The “first-in” district served by Fire Station No. 92 is generally bounded by Santa Monica Boulevard and a portion of the Los Angeles Country Club Golf Course on the north, the City of Beverly Hills boundary on the east, National Boulevard on the south, and the San Diego Freeway on the west which corresponds to the West Los Angeles Community Plan Area east of the Santa Monica Freeway with the exclusion of Census Tracts 269100 and 269500. City of Los Angeles Planning Department 2005 population data for census tracts in this area are as follows: Census Tract 267100 (5,794 residents), Census Tract 267200 (5,587 residents), Census Tract 267800 (2,788 residents), Census Tract 267900 (5,817 residents), Census Tract 269000 (5,012 residents), Census Tract 269300 (4,274 residents), Census Tract 269800 (3,554 residents), Census Tract 271100 (3,941 residents).

553 new residents.<sup>166</sup> Based on the generation factor of 0.0735 incidents per capita, the residential component of the proposed project could potentially generate 41 additional incidents per year. In addition, the project would result in a net increase of 358,881 square feet of commercial uses associated with the Westfield Century City Shopping Center and a net increase of approximately 203.8 employees. Furthermore, in addition to the permanent increase in residents and employees attributable to the project, development would result in an increase in visitors associated with the shopping center. Thus, project implementation would increase the demand on LAFD services.

The adequacy of fire protection for a given area is based on response distance from existing fire stations, required fire flow, and the LAFD's judgment for needs in the area.<sup>167</sup> Fire Station No. 92 is located 1.4 miles from the project site, which is within the recommended maximum response distance (1.5 miles), and has an estimated response time of 5.2 minutes to the project site. Therefore, construction of additional stations in closer proximity to the project site would not be required.

With regard to fire flow, requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. While the existing fire flow to the project site is approximately 9,000 gpm, the LAFD Bureau of Fire Prevention and Public Safety has suggested a potential need for fire flow to the proposed project at 12,000 gpm. Preliminary review of existing water facilities by LADWP has determined that sufficient fire flow does not currently exist to accommodate 12,000 gpm water flow to the project site. Therefore, implementation of the proposed project would require either upgrades to existing water lines, additional connections, or both. The Applicant has been coordinating with LADWP and LAFD during the development of the project plans in order to ensure that adequate fire flow is provided. With implementation of Mitigation Measure I.1-1, potential impacts related to fire flow would be reduced to a less than significant level.

Project-related increase in traffic on surrounding roadways could have an impact on fire protection and emergency medical services if the response capabilities of the LAFD are impeded. However, due to the proximity of Fire Station No. 92 (1.4 miles) and the other two supporting stations to the site, and the number of major roadways serving the project site, emergency response to the project site is not expected to fall below acceptable levels (generally 5 minutes). Thus, project-related traffic is not anticipated to impair the LAFD from responding to service

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<sup>166</sup> *Based on the 2005 West Los Angeles Community Plan household population data of 2.11 persons per unit provided by the City of Los Angeles.*

<sup>167</sup> *Letter from Douglas L. Barry, Assistant Fire Marshal, LAFD Bureau of Fire Prevention and Public Safety, September 13, 2006.*

requests at the project site. Finally, as described in Section 3.c., the project would provide access for emergency vehicles to the project site subject to the approval of the LAFD. The Applicant has been coordinating with LAFD during the development of the project plans in order to ensure that emergency vehicles and equipment would be accessible to the proposed residential and shopping center uses. With implementation of Mitigation Measures I.1-2 through I.1-5, the proposed project's potential impacts related to emergency access would be less than significant.

#### 4. CUMULATIVE IMPACTS

Section III of this EIR identifies 108 related projects that are anticipated to be developed in the vicinity of the project site. For purposes of this cumulative analysis on fire protection and emergency medical services, only those related projects located within Fire Station No. 92's "first-in" district are considered. Of the 108 related projects identified in Section III, 15 are located within Fire Station No. 92's "first-in" district as listed in Table 41 on page 498. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional fire protection and emergency medical services. The related projects include various residential, commercial/retail, and office uses. Because the generation factor used to determine the number of annual incidents is based on residential population within Fire Station No. 92's service area, the estimated number of incidents that could potentially be generated by related projects is only calculated for those projects with proposed residential uses. As shown in Table 41, related projects could potentially generate 163 incidents per year. The proposed project in conjunction with related projects could therefore generate 204 incidents per year. This represents a 7.5 percent increase in annual incidents. In addition, related projects would result in an increase of commercial uses, which would further increase the demand on LAFD services. The project's impact on fire protection and emergency medical services would be mitigated to a less than significant level. In addition, all related projects would comply with the LAMC Fire Code and Building Code regulations related to fire safety, access, and fire flow. Furthermore, "second call" stations would help support Fire Station No. 92 in the event of an emergency at these sites. Therefore, cumulative impacts on fire protection and emergency medical services would be less than significant.

#### 5. MITIGATION MEASURES

Implementation of the following mitigation measures would ensure that impacts related to fire safety are less than significant.

**Mitigation Measure I.1-1:** Prior to the occupancy of the residential component of the proposed project, the Applicant shall work with LADWP to construct, or otherwise suitably guarantee to LADWP, the construction of a 12-inch water

Table 41

## Related Projects Within Fire Station No. 92 Service Area

Map No. <sup>a</sup>	Project	Location	No. of Units	Approximate No. of Annual Incidents <sup>b</sup>
11	Fox Studio Expansion	10201 W. Pico Blvd.	-	-
15	ABC Entertainment Center	2000 Ave. of the Stars	-	-
16	St. Regis Redevelopment Project	2055 Ave. of the Stars	147	23
20	Condominiums	1826 S. Glendon Ave.	16	2
22	New Car Sales	10534 W. Pico Blvd.	-	-
27	Condominiums	2037 S. Beverly Glen Blvd.	16	2
38	Condominiums	1807 S. Beverly Glen Blvd.	16	2
39	Condominiums	2263 S. Fox Hills Dr.	15	2
40	Cooking School	10955 W. Pico Blvd.	-	-
42	Westside Pavilion Renovation	10850 Pico Blvd.	-	-
44	Condominiums	10131 Constellation Blvd.	483	75
46	Condominiums	1333 S. Beverly Green Dr.	5	1
48	Apartments	10000 W. Santa Monica Blvd.	350	54
57	Auto Service	10461 Santa Monica Blvd.	-	-
58	Office	Southwest corner of Santa Monica Blvd. and Beverly Glen Ave.	-	-
<b>Related Projects Total</b>				<b>163</b>
<b>Proposed Project Total</b>				<b>41</b>
<b>Grand Total</b>				<b>204</b>

<sup>a</sup> Corresponds with Map Nos. on Figure 15 on page 153 in Section III of this EIR.

<sup>b</sup> The same methodology used to determine the approximate number of incidents generated by the proposed project was utilized to estimate the approximate number of incidents for related projects. The number of residential units was multiplied by the 2005 average household size as indicated by the population data obtained for the West Los Angeles Community for projects located in the Community Plan area. For projects located outside the West Los Angeles Community Plan area, the average household size as indicated by the population data obtained for the associated census tract was used. This number was then multiplied by the generation factor of 0.0735 incidents per capita.

Source: PCR Service Corporation, 2006.

line within Constellation Boulevard along the project site frontage between Avenue of the Stars and Century Park West in order to allow for 12,000 gpm water flow to the project site, when connected to the water flow regulator station to be constructed by LADWP at or near the intersection of Century Park East and Olympic Boulevard. The design of the water line shall be subject to the approval of the Fire Department and LADWP.

**Mitigation Measure I.1-2:** Project building plans including a plot plan shall be submitted for approval by the Los Angeles Fire Department prior to the issuance of a building permit. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes,



roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

**Mitigation Measure I.1-3:** Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features and other life-saving equipment (e.g. defibrillators) appropriate to the design of the project.

**Mitigation Measure I.1-4:** Where fire apparatus (e.g., trucks, equipment, etc.) will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

**Mitigation Measure I.1-5:** The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles, unless otherwise approved.

## 6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

In compliance with the LAMC Fire Code, the Los Angeles General Plan, the General Plan Safety Element, and all other applicable ordinances and requirements, the proposed project would not result in any significant impacts on fire protection and emergency medical services. Implementation of the recommended mitigation measures would ensure that the project's impacts on the delivery of fire protection and emergency medical services to the project site are less than significant. Thus, no significant unavoidable impacts are anticipated.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**I. PUBLIC SERVICES**  
**2. POLICE PROTECTION**

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**1. INTRODUCTION**

This section addresses impacts on police services that would occur due to increased population, traffic, and construction activities associated with the proposed project. The focus of the analysis is on the Los Angeles Police Department (LAPD) facilities that currently serve the project site and the ability of the LAPD to provide police services to the proposed project. This section is based on information provided by the LAPD Community Relations Section, Crime Prevention Unit regarding police protection facilities, services, and response times.

**2. ENVIRONMENTAL SETTING**

**a. Regulatory Environment**

**(1) Los Angeles General Plan Framework**

The City of Los Angeles General Plan Framework, adopted in December 1996 and again in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines Citywide policies regarding land use, including infrastructure and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Citywide General Plan Framework is that every neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.<sup>168</sup> Objective 9.13 and Policy 9.13.1 requires the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet existing and future public needs. Additionally, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

Presently, the LAPD Computer Statistics Unit (COMPSTAT) implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT was created in 1994 by then Police Commissioner of the

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<sup>168</sup> *City of Los Angeles General Plan Framework, page 9-5.*

New York Police Department and current Chief of the LAPD, William J. Bratton. This system implements a multilayer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. As such, COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.<sup>169</sup>

## (2) City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter Article V, Section 570; the City of Los Angeles Administrative Code Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC) Chapter 5 (Public Safety and Protection), Article 2 (Police and Special Officers).

City of Los Angeles Charter Article V, Section 570 gives power and duty to the Police Department to enforce the penal provisions of the Charter, City ordinances and state and federal law. The charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity. Section 22.240 of the Los Angeles Administrative Code requires the LAPD to adhere to the State of California standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances, such as excessive noise, and providing support to the Department of Building and Safety Code Enforcement inspectors and the Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures in regards to new development. Furthermore, as stated under the Administrative Code, the LAPD is also given the duty and power to protect the lives and properties of the community in the case of a disaster or public calamity.

### b. Existing Conditions

The LAPD includes 19 community police areas and four traffic divisions operated by four geographically located bureaus: the Central, South, West, and Valley Bureaus. The LAPD also has a variety of support systems including the Direct Support Division, Special Operations, Municipal Division, SWAT, K-9, and the Mounted Unit.

The project site is located in the West Bureau of the LAPD, which covers approximately 122 square miles encompassing the neighborhoods of Pacific Palisades, Westwood, Century

<sup>169</sup> LAPD. "COMPSTAT." [http://www.lapdonline.org/search\\_results/content\\_basic\\_view/6363](http://www.lapdonline.org/search_results/content_basic_view/6363), accessed October 19, 2006.

City, Venice, Hancock Park, and the Miracle Mile. The West Bureau oversees operations at four community police stations including the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, and the West Los Angeles Community Police Station. The West Bureau also oversees operations at the West Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau. Approximately 182 sworn officers and nine civilians serve under the West Traffic Division.

The project site is served by the West Los Angeles Community Police Station, located at 1663 Butler Avenue, approximately 2.3 miles from the project site. The West Los Angeles Community Police Station serves an area that is approximately 64.14 square miles and approximately 748 street miles, and is bordered by the cities of Beverly Hills, Culver City, Santa Monica, as well as Los Angeles County and the Pacific Ocean. The West Los Angeles Community Police Station has approximately 234 sworn officers and 16 civilians deployed within the West Los Angeles Area. The West Los Angeles Community Police Station currently provides service to a residential population of approximately 221,876 residents.<sup>170</sup> According to the LAPD, the service population increases to approximately one-half million people when taking into account those that work in the West Los Angeles area, those that visit neighborhoods within West Los Angeles, and those that attend surrounding educational institutions including the University of California at Los Angeles (UCLA).<sup>171</sup> In the event a situation should arise requiring increased staffing, additional officers can be called in from other LAPD community police stations. The area served by the West Los Angeles Community Police Station is further divided into several reporting districts. The project site is located within Reporting District (RD) 839. The service boundaries of RD 839 are Santa Monica Boulevard to the north, the Los Angeles City boundary to the east, Olympic Boulevard to the south, and Fox Hills Drive to the west.

Table 42 on page 503 provides statistics for the West Los Angeles Community Police Station area and Citywide service areas in terms of population, sworn officers, and crime. As shown in Table 42, the West Los Angeles Community Police Station has 234 sworn officers. Based on the West Los Angeles service population of 221,876 residents, the officer to resident ratio is approximately one officer per 948 residents. Citywide, the ratio is approximately one officer per 393 residents. With regard to crime, the West Los Angeles Community Police Station reported 6,332 crimes. Based on population, the number of crimes per 1,000 residents is 28.5. Citywide, the number of crimes per 1,000 residents is 39.4. The average response time of

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<sup>170</sup> Lieutenant Fred Booker, LAPD, Community Relations Section, Crime Prevention Unit, letter correspondence dated August 21, 2006. Statistical information provided is based on year 2005 data.

<sup>171</sup> LAPD, [http://www.lapdonline.org/west\\_la\\_community\\_police\\_station/content\\_basic\\_view/1630](http://www.lapdonline.org/west_la_community_police_station/content_basic_view/1630), accessed October 19, 2006.

Table 42

## Population, Officer, Crime, and Response Time Comparison for 2005

Service Area	Square Miles	Population	Sworn Officers	Officer/Resident Ratio	Crimes	Crimes per 1,000 Residents	Average Response Time
West Los Angeles Community Police Station	64.14	221,876	234	1/948	6,332	28.5	8.6 minutes
Citywide	472.67	3,694,754	9,387 <sup>a</sup>	1/393	145,666	39.4	6.8 minutes

<sup>a</sup> LAPD website, Citywide Crime Statistics, <http://www.lapdonline.org/assets/pdf/cityprof.pdf>, accessed December 18, 2006.

Source: Lieutenant Fred Booker, LAPD, Community Relations Section, Crime Prevention Unit, letter correspondence dated August 21, 2006. Statistical information is based on 2005 LAPD Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System reports.

the West Los Angeles Community Police Station to emergency calls is 8.6 minutes. The Citywide average is 6.8 minutes.<sup>172</sup>

Table 43 on page 504 provides a breakdown of the 2005 crime statistics for RD 839, the West Los Angeles Community Police Station, and Citywide. As indicated in Table 43, the crime with the highest occurrence in RD 839 (73 percent) is theft. The crime with the highest occurrence in the West Los Angeles Area (41 percent) and Citywide (30.5 percent) is burglary. The total number of crimes reported within RD 839 (245) and the West Los Angeles Area (6,332) are approximately 0.16 percent and 4.3 percent, respectively, of the total crimes reported Citywide.

The Westfield Century City Shopping Center currently maintains an extensive 24-hour security program to ensure visitor and property safety and to assist in crime prevention. A security staff with a total of 36 officers provides security services to the shopping center in three shifts: morning, swing, and night. These shifts include foot patrol, bike patrol, and golf cart patrol. Currently, approximately eight officers are assigned to the morning and swing shifts, and three officers are on patrol during the night shift. During the morning and swing shifts, a minimum of four security officers are assigned on foot patrol, one on bike patrol, one at security dispatch, and one supervisor. In addition, in order to provide adequate safety protection to the site, security patrols are maximized according to day-to-day events. Patrolling zones have been established throughout the facility to ensure that all areas of the center are regularly monitored and inspected.

<sup>172</sup> Lieutenant Fred Booker, LAPD, Community Relations Section, Crime Prevention Unit, letter correspondence dated August 21, 2006. All statistical information is based on 2005 LAPD Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 reports.

Table 43

## Crimes Statistics by Reporting District

Crime	RD 839		West Los Angeles Area		Citywide	
	Number	Percent	Number	Percent	Number	Percent
Burglary <sup>a</sup>	41	17	2,593	41	44,426	30.5
Robbery <sup>b</sup>	8	3	359	6	13,547	9
Murder	0	0	3	0	489	0.3
Rape	2	0.8	29	0.5	1,055	0.7
Aggravated Assault	7	3	221	3.5	15,997	11
Theft <sup>c</sup>	180	73	2,399	37	41,694	29
Vehicle Theft	6	2	722	11	28,255	19
Bunco	1	0.4	6	0	203	0.1
<b>Total</b>	<b>245</b>	<b>100</b>	<b>6,332</b>	<b>100</b>	<b>145,666</b>	<b>100</b>

<sup>a</sup> Includes burglaries from residences, businesses, vehicles, and other.

<sup>b</sup> Includes street and other robberies.

<sup>c</sup> Includes theft from people, vehicles, and other as well as grand theft.

Source: Lieutenant Fred Booker, LAPD, Community Relations Section, Crime Prevention Unit, letter correspondence dated August 21, 2006. All statistical information is based on 2005 LAPD Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 reports.

Westfield security also utilizes two programs to assist with security patrol activities. The first program, Tour Trax, is a data collection system that collects information on the on-duty officer's daily patrolling activities. As an officer patrols his or her assigned area, he or she hits points or "data probes" along designated areas of the patrol route. These data probes record the officer's daily monitoring and inspection activities. The second program, CASE Global (Computer-Assisted Security Environment), is a computer-assisted program used for security data collection, monitoring, incident tracking and emergency notification. A total of approximately 64 security cameras are located throughout the shopping center, primarily at the entrance and exit points of the center, and at the exits of the parking structures which record images of each vehicle license plate.

Westfield security also coordinates regularly with the LAPD to ensure adequate provision of law enforcement and security services at the center. Westfield holds weekly meetings every Friday with the LAPD Senior Lead Officer of the area to discuss current local crimes in the area. Every Friday evening, the LAPD Explorer units, partnered with Westfield, provide additional security enforcement during those busy evenings. In the event additional security resources or assistance is required, Westfield's participation in the Sister Mall program and Security Task force would provide such services.

### 3. PROJECT IMPACTS

#### a. Methodology

The determination of significance relative to impacts on police services is based on the ability of police personnel to adequately serve the existing and future population. The analysis presents COMPSTAT statistical averages associated with the police division serving the project site, the regional bureau, and citywide services. Data include the ratio of officer per residents, major crimes and arrests, and arrests per officer in the local district, the regional bureau, and Citywide. Potential impact to police protection services has been evaluated based on two criteria. The first criterion is the ability of the West Los Angeles Community Police Station to meet the additional demand for police protection services resulting from development of the proposed project. To determine this, the number of annual crimes and/or calls anticipated to be generated by the proposed residential and retail uses were estimated.<sup>173</sup> The number of annual crimes generated by the proposed residential uses were calculated as follows: (1) a per capita rate of annual crimes in the West Los Angeles area was determined by dividing the total number of crimes in the West Los Angeles area (identified in Table 43) by the population of the West Los Angeles area (identified in Table 42); and (2) the per capita rate was then multiplied by the proposed project's estimated population to generate the approximate number of crimes that could potentially be generated by the residential component of the project. The number of annual calls generated by the proposed retail uses were calculated as follows: (1) a square footage rate of annual calls within the Westfield Century City Shopping Center was determined by dividing the total number of calls for the shopping center in 2005 by its existing square footage; (2) the square footage rate was then multiplied by the proposed project's net increase in square footage to generate the approximate number of calls that could potentially be generated by the retail component of the project. The second criterion evaluated was the project's proposed security and/or design features that would reduce the demand for police protection services.

#### b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006)*, the determination of significance is made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area.
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled

<sup>173</sup> To provide a conservative analysis, the reduction in crimes that could result from the reduction in office uses at the project site was not included in the analysis.



improvements to LAPD services (facilities, equipment, and officers) and the project’s proportional contribution to the demand.

- Whether the project includes security and/or design features that would reduce the demand for police services.

### **c. Project Design Features**

The proposed project involves the reconfiguration or renovation of existing buildings and outdoor areas within the current Westfield Century City Shopping Center to provide for new retail and restaurant spaces, as well as landscaping, open space amenities, new office uses, and parking areas. The shopping center would include indoor/outdoor facilities and new promenades and open spaces that would provide a continuous pedestrian corridor through the shopping center to an existing Avenue of the Stars pedestrian bridge. In addition, the project would replace the existing office building adjacent to the shopping center at 1801 Avenue of the Stars with a residential development located above new shopping center uses and subterranean parking. The existing office building at 1930 Century Park West would be replaced with a new five-story parking facility (plus a rooftop parking level) and two subterranean parking levels below. When accounting for the existing retail uses to be removed, the proposed project would result in a net increase of approximately 358,881 square feet of retail uses and 262 multi-family residential, apartment, or condominium units. Currently, security design features are already in place at the existing shopping center; however, due to the expansion of the shopping center and additional development, the proposed project would incorporate additional safety design features to the new sections of the shopping center and would implement security features at the new parking structure and the residential tower.

In order to maintain high levels of safety for visitors to the Westfield Century City Shopping Center, the 24-hour on-site security personnel would be expanded as necessary, depending on the anticipated day-to-day levels of activity. During each shift, security personnel would continue to be assigned to foot patrol, bike patrol and golf cart patrol, in order to cover all areas of the site. An additional security program would also be implemented in addition to the computer-assisted security programs currently maintained at the site. The Applicant is in the process of developing a computer assisted “EpiCS”, an Emergency Preparedness Incident Command System, in conjunction with the Department of the Army, LAFD, and LAPD.

Additional security system features to be installed on-site include security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas. Additional closed-circuit television (CCTV) would also be installed at locations in compliance with Westfield standards. These locations would include but are not limited to all exit points, play areas, family rest areas, food courts, loading docks, and parking areas.

On-site security consisting of personnel and equipment also would be provided to monitor the residential component of the proposed project. Duties of the security personnel would include but would not be limited to the following:

- Assisting with resident access and monitoring entrances and exits.
- Managing and monitoring fire/life/safety systems.
- Patrolling the perimeter of the property.
- Controlling and monitoring activities in the parking facilities.
- Controlling and monitoring activities in private and public spaces.

In order to ensure safety and manage visitors, residents, and office workers, security kiosks would be built in the lobby areas of the residential tower and office building, and in the parking facility. The commercial and residential building would have a keycard access system with a central station and keycard readers placed in all elevators to permit access for the residents and guests to the multi-family residential units. The lower subterranean parking levels in 1801 Avenue of the Stars will be reserved for use by residents and their guests.

The proposed project would also incorporate the following design features to facilitate and ensure on-site security.

- Lighting of parking structures, elevators, and lobbies to reduce areas of concealment.
- Lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings.
- Design public spaces to be easily patrolled and accessed by safety personnel.
- Parking facilities easily patrolled and accessed by safety personnel.
- Design of entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

#### **d. Analysis of Project Impacts**

##### **(1) Construction**

Construction-related traffic on adjacent streets could potentially affect emergency access to the project site. Construction activities may involve temporary lane closures for utility

construction (generally only one lane so through access on all roadways serving the project site would be maintained). Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction (i.e., for the movement of construction equipment, and hauling of demolition and graded materials). As such, construction activities could increase response time for emergency vehicles to local businesses on Santa Monica Boulevard, Avenue of the Stars, Century Park West, and Constellation Boulevard, due to travel time delays to through traffic. However, as discussed in Section IV.J., Traffic and Circulation, the proposed project would require implementation of a Construction Staging and Traffic Management Plan. Upon implementation of this plan, traffic impacts from construction activity would be less than significant. Therefore, construction-related traffic impacts to emergency access would be less than significant.

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft. This could potentially necessitate police involvement unless adequate safety and security measures are implemented to secure the site. Mitigation has been developed to reduce this potentially significant impact during construction to a less than significant level.

## **(2) Operation**

As previously discussed, the project site is served by the West Los Angeles Community Police Station, which has approximately 234 sworn officers and 16 civilians deployed within the West Los Angeles Area. As shown in Table 42, the West Los Angeles Community Police Station, which provides service to a residential population of approximately 221,876 people, reported 6,332 crimes in 2005. By dividing the number of annual crimes by the residential population of the West Los Angeles Area, a generation factor of 0.0285 annual crimes per capita was derived. The project would generate approximately 553 new residents.<sup>174</sup> Based on the generation factor of 0.0285 crimes per capita, the residential component of the proposed project could potentially generate 16 additional crimes per year. The number of annual calls for the retail component of the proposed project was also estimated. As previously stated, the existing 833,393-square foot Westfield Century City Shopping Center generated 18 calls to the LAPD in 2005. By dividing the total number of calls by the shopping center's existing square footage, a generation factor of 0.000022 annual calls per square foot was derived. The project would result in a net increase of 358,881 square feet of shopping center uses. Based on the generation factor of 0.022 call per 1,000 square feet, the retail component of the proposed project could potentially generate eight additional calls per year. Combined, the proposed residential and shopping center

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<sup>174</sup> Based on the 2005 West Los Angeles Community Plan household population of 2.11 persons per unit provided by the City of Los Angeles.

uses could potentially generate 24 crimes/calls per year, which is less than a 0.01 percent increase in potential crimes/calls.<sup>175</sup> Furthermore, the estimated additional calls per year calculation does not reflect removal of office uses; therefore, the estimate is considered to be conservative. Lastly, the increase in population from 221,876 residents to 222,429 residents in the West Los Angeles Area would only alter the officer to resident ratio from one officer per 948 residents to one officer per 951 residents, which is nominal. Additionally, as described above, the project would provide adequate security features on the project site related to additional levels of security around the commercial facilities including foot patrol, bike patrol, and golf cart patrol; on-site residential security; implementation of additional computer-assisted security programs; and security lighting in areas including but not limited to parking structures, pathways, and curbside queuing areas. CCTV would also be installed in locations including but not limited to all exit points, playtowns, family rest areas, food courts, loading docks, and parking areas. Therefore, the proposed project would not result in a demand for additional police protection services that would exceed the capability of the LAPD to serve the project site. Potential impacts to the capability of existing police protection services would be less than significant.

#### 4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 108 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on police protection services, only those related projects located within the West Los Angeles Community Police Station service area are considered. Of the 108 related projects identified in Section III, 63 are located within the West Los Angeles Community Police Station service area as listed in Table 44 on page 510. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional police protection services. The related projects include various residential, educational, commercial/retail, and office uses. Similar to the proposed project, the number of annual crimes and/or calls anticipated to be generated by related projects were estimated based on residential and non-residential increases in population. As shown in Table 44, related projects could potentially generate 638 additional crimes/calls per year. The proposed project in conjunction with related projects could therefore generate 662 additional crimes/calls per year. This represents a 10.5 percent increase in annual crimes/calls. However, all related projects would be reviewed by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Therefore, cumulative impacts to the existing police protection services would be less than significant.

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<sup>175</sup> Please note that this approximation does not take into account the 254,441-square foot reduction in office uses, which may further reduce the overall number of crimes/calls from the proposed project.

Table 44

## Related Projects Within West Los Angeles Community Police Station Service Area

Map No. <sup>a</sup>	Project	Location	Residential <sup>b</sup> and Non-Residential <sup>c</sup> Population	Approximate No. of Crimes per Capita <sup>d</sup>
1	UCLA Westwood Campus Expansion	UCLA Westwood Campus	2,000 <sup>e</sup>	57
2	FBI Office	11000 Wilshire Blvd.	1,000 <sup>f</sup>	29
3	Palazzo Westwood Retail, High-Turnover Restaurant	1001 Tiverton Ave.	884	25
4	Medical Office, Theater	Southeast corner of Broxton Ave. and Le Conte Ave.	1,485 <sup>g</sup>	42
5	Theater Expansion	10886 Le Conte Ave.	106 <sup>g</sup>	3
6	Apartments, Specialty Retail	10852 Lindbrook Ave.	50	1
7	Apartments	860 S. Devon Ave.	27	1
8	Condominiums	10804 Wilshire Blvd.	154	4
9	Condominiums	10776 Wilshire Blvd.	221	6
10	Private School Expansion	700 N. Faring Rd.	0 <sup>h</sup>	0
11	Fox Studio Expansion	10201 W. Pico Blvd.	1,440	41
12	High School Expansion	9760 W. Pico Blvd.	0 <sup>h</sup>	0
13	Private School	9051 Pico Blvd.	0 <sup>h</sup>	0
14	Wilshire/Comstock Condominium Project	10250 W. Wilshire Blvd.	62	2
15	ABC Entertainment Center	2000 Ave. of the Stars	3,209	91
16	St. Regis Redevelopment Project	2055 Ave. of the Stars	296	9
17	Condominiums	527 S. Midvale St.	256	7
18	Residential Hotel	10844 W. Lindbrook Dr.	71	2
19	Health/Fitness Center	10960 W. Wilshire Blvd.	108	3
20	Condominiums	1826 S. Glendon Ave.	29	1
21	Condominiums	1417 S. Butler Ave.	28	1
22	New Car Sales	10534 W. Pico Blvd.	8	0
23	Condominiums	1625 S. Barry Ave.	39	1
24	Condominiums	1525 S. Armacost Ave.	39	1
25	Condominiums	1633 S. Armacost Ave.	35	1
26	Condominiums	10763 W. Wilshire Blvd.	101	3

Table 44 (Continued)

## Related Projects Within West Los Angeles Community Police Station Service Area

Map No. <sup>a</sup>	Project	Location	Residential <sup>b</sup> and Non-Residential <sup>c</sup> Population	Approximate No. of Crimes per Capita <sup>d</sup>
27	Condominiums	2037 S. Beverly Glen Blvd.	30	1
28	Office	12233 Olympic Blvd.	1,320	38
29	Condominiums	1511 S. Camden Ave.	31	1
30	Condominiums, Office, Specialty Retail	11663 Wilshire Blvd.	240	7
31	Mausoleum Building	1218 S. Glendon Ave.	0 <sup>i</sup>	0
32	Condominiums	10617 W. Eastborne Ave.	30	1
33	Condominiums	1517 S. Bentley Ave.	42	1
34	Apartment	1817 S. Beloit Ave.	28	1
35	Live/Work Units	11500 W. Tennessee Ave.	186	5
36	Condominiums	430 S. Kelton Ave.	97	3
37	Restaurant	10935 W. Weyburn Ave.	0	0
38	Condominiums	1807 S. Beverly Glen Blvd.	30	1
39	Condominiums	2263 S. Fox Hills Dr.	25	1
40	Cooking School	10955 W. Pico Blvd.	0 <sup>h</sup>	0
41	Bank	1762 Westwood Blvd.	18	1
42	Westside Pavilion Renovation	10850 Pico Blvd.	4,510 <sup>g</sup>	129
43	Le Lycee Francis High School	10309 W. National Blvd.	0 <sup>h</sup>	0
44	Condominiums	10131 Constellation Blvd.	903	29
45	Discounted Store	11840 Olympic Blvd.	260	7
46	Condominiums	1333 S. Beverly Green Dr.	10	0
47	Belmont Village	Wilshire Blvd./Warner St.	259	7
48	Apartments	10000 W. Santa Monica Blvd.	655	21
49	Apartment, Retail	10901 Santa Monica Blvd.	94	3
50	Condominiums, Office, Retail	10604-10612 National Blvd.	63	2
51	Regent Westwood Mixed-Use	1015 Broxton Ave.	336 <sup>g</sup>	10
52	Office	1100 Westwood Blvd.	139	4

Table 44 (Continued)

## Related Projects Within West Los Angeles Community Police Station Service Area

Map No. <sup>a</sup>	Project	Location	Residential <sup>b</sup> and Non-Residential <sup>c</sup> Population	Approximate No. of Crimes per Capita <sup>d</sup>
53	Del Capri Hotel	Wilshire Blvd/ Westholme Ave.	148	4
54	Condominiums	11611 Montana Ave.	34	1
55	Office	11677 Wilshire Blvd.	587	17
56	Retail	11305 Santa Monica Blvd.	3	0
57	Auto Service	10461 Santa Monica Blvd.	6	0
58	Office	Southwest corner of Santa Monica Blvd. and Beverly Glen Ave.	100	3
59	Fast Food Restaurant and Snack Shop	10867 Santa Monica Blvd.	6	0
60	Day Care and Private School (K-8)	1062 Robertson Rd.	0 <sup>h</sup>	0
61	Brentwood Retail Center Project	1171 Gorham Ave.	64	2
62	Olympic Stoner Retail Center	11785 Olympic Blvd.	69	2
63	Condominiums	10710 Wilshire Blvd.	119	3
<b>Related Projects Total</b>			<b>22,377</b>	<b>638</b>
<b>Proposed Project Total</b>				<b>24</b>
<b>Grand Total</b>				<b>662</b>

<sup>a</sup> Corresponds with Map Nos. on Figure 15 on page 153 in Section III of this Draft EIR.

<sup>b</sup> For related projects with residential uses, the residential population was determined by multiplying the number of residential units by the average household size as indicated by the population data obtained for the census tract where each project is located.

<sup>c</sup> For related projects with non-residential uses, the non-residential population was determined based on the following generation factors as indicated in the City of L.A. CEQA Thresholds Guide (2006): 4 persons per 1,000 square feet of office space, 3 persons per 1,000 square feet of retail space, and 1.5 persons per hotel room. Any exceptions to this methodology are noted.

<sup>d</sup> The residential and non-residential population was multiplied by the generation factor of 0.0285 crimes per capita to estimate the number of crimes generated by related projects.

<sup>e</sup> Based on the number of beds rather than population data (1 bed = 1 person).

<sup>f</sup> Based on the number of new employees (no square feet given).

<sup>g</sup> Theater uses based on the number of seats rather than square feet (1 seat = 1 person).

<sup>h</sup> No population was calculated for school uses since the increase in population for such uses would generally be accounted for in new residential uses within the area and would result in double counting.

<sup>i</sup> No population was calculated for this use since project information is in number of acres.

Source: PCR Service Corporation, 2007.



## 5. MITIGATION MEASURES

Construction activities may cause impacts that would affect police service to the project site. Mitigation Measures I.2-1 through I.2-3 would reduce impacts due to construction activities to a less than significant level. Project operation would not result in any impacts that would significantly affect the capacity of the LAPD to serve the project. Although no significant impacts have been identified for project operations, Mitigation Measures I.2-4 through I.2-6 are recommended to ensure that specific design features would be implemented.

**Mitigation Measure I.2-1:** During project construction, the Applicant shall develop and implement an Emergency Procedures Plan, including notification to the LAPD of any lane closures or other road construction.

**Mitigation Measure I.2-2:** During project construction, the Applicant shall ensure adequate emergency access to adjacent uses.

**Mitigation Measure I.2-3:** During project construction, the Applicant shall implement security measures including security fencing, lighting, and the use of a seven-day, 24-hour security patrol.

**Mitigation Measure I.2-4:** The Applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate for the design of the project.

**Mitigation Measure I.2-5:** Entryways, elevators, lobbies, and parking areas shall be well illuminated and designed to eliminate areas of concealment.

**Mitigation Measure I.2-6:** Upon project completion, the Applicant shall provide the West Los Angeles Community Police Station Commanding Officer with a diagram of each portion of the property, including access routes and provide additional information that might facilitate police response.

## 6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The project would not result in significant impacts to police protection services with the implementation of project safety design features and the recommended mitigation measures.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**I. PUBLIC SERVICES**  
**3. SCHOOLS**

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**1. INTRODUCTION**

This section evaluates potential impacts on existing school facilities operated by Los Angeles Unified School District (LAUSD) from implementation of the proposed project. The analysis is based in part on information provided by the LAUSD Facilities Services Division and the Developer Fee Office.

**2. ENVIRONMENTAL SETTING**

**a. Regulatory Framework**

**(1) California Education Code**

School services for the project are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. In addition, due to Proposition 13, the State is also responsible for the allocation of education funds that are acquired from property taxes.

**(2) Senate Bill 50**

Senate Bill 50 (SB 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of \$9.2 billion, including grants for new school construction and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.<sup>176</sup>

SB 50 allows LAUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. LAUSD collects the maximum new school construction facility fee at a rate of \$3.60 per square foot of residential construction, \$0.34 per square foot of

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<sup>176</sup> *State of California, Office of Public School Construction, School Facility Program Handbook, February 2005.*

commercial construction, and \$0.09 per square foot for parking structures.<sup>177</sup> Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant.

### **b. Existing Conditions**

LAUSD is one of the largest public school districts in the nation encompassing approximately 710 square miles and serving the City of Los Angeles, 32 other cities either entirely or partially within LAUSD, and several unincorporated areas of Los Angeles County. LAUSD provides public education to a total of approximately 708,461 students enrolled throughout a total of 873 kindergarten through high school (K-12) schools, and 282 independent K-12 charter schools and centers.<sup>178</sup> Currently, there are 435 elementary schools, 74 middle schools, and 61 senior high schools serving approximately 635,127 K-12 students.<sup>179</sup>

In addition to utilizing SB 50 fees, other major statewide funding sources for school facilities are Proposition 47, a \$13.2 billion bond approved in November 2002, containing \$11.4 billion for kindergarten through high school (K-12) public school facilities and Proposition 55, a \$12.3 billion bond approved in March 2004, containing \$10 billion to address overcrowding and accommodate future growth in K-12 schools. Local measures provide additional funding for existing and new school construction projects.

Utilizing the funding sources described above, LAUSD has implemented the New School Construction Program: a multi-year capital improvement program valued at over \$19.3 billion.<sup>180</sup> The New School Construction Program is the major component of LAUSD's plan to relieve overcrowding in its schools by returning students to a single-track calendar; reduce class sizes to agreed limits at all grade levels; provide special education facilities; provide pre-kindergarten facilities; and reduce the reliance on portable classrooms. By the end of 2006, LAUSD will have completed 66 new schools, 44 school additions, and 22 early education centers through the New

<sup>177</sup> LAUSD Developer Fee Program Office, received via fax November 1, 2006.

<sup>178</sup> LAUSD Office of Communications, *Fingertip Facts 2006-2007*, [http://notebook.lausd.net/pls/ptl/docs/PAGE/CA\\_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/0607FINGERTIPFACTSHEET\\_REVISED.PDF](http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/0607FINGERTIPFACTSHEET_REVISED.PDF), accessed January 18, 2007.

<sup>179</sup> These numbers exclude independent charter schools.

<sup>180</sup> LAUSD Office of Communications, *Fingertip Facts 2006-2007*, [http://notebook.lausd.net/pls/ptl/docs/PAGE/CA\\_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/0607FINGERTIPFACTSHEET\\_REVISED.PDF](http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/0607FINGERTIPFACTSHEET_REVISED.PDF), accessed January 18, 2007.

School Construction Program. The program is expected to add approximately 170,000 new seats and build 150 new schools by the end of 2012.<sup>181</sup>

The District area is divided into eight Local Districts. As shown in Figure 55 on page 517, the project site is located within LAUSD Local District 3. Within LAUSD District 3, the project would be served by Westwood Charter Elementary School, Emerson Middle School, Webster Middle School, and University High School. These schools are currently operating on a single-track calendar in which instruction generally begins in early September and continues through late June. In addition, the project site is located in a middle school attendance option area, in which students have a choice of attending either Emerson Middle School or Webster Middle School. Table 45 on page 518 lists the schools that would serve the project site, as well as their location, distance from the project site, current capacity, current enrollment, and available seating capacity. Available seating capacity is based on the current enrollment compared to the respective school's capacity. As shown in Table 45, all four schools are currently operating within capacity.

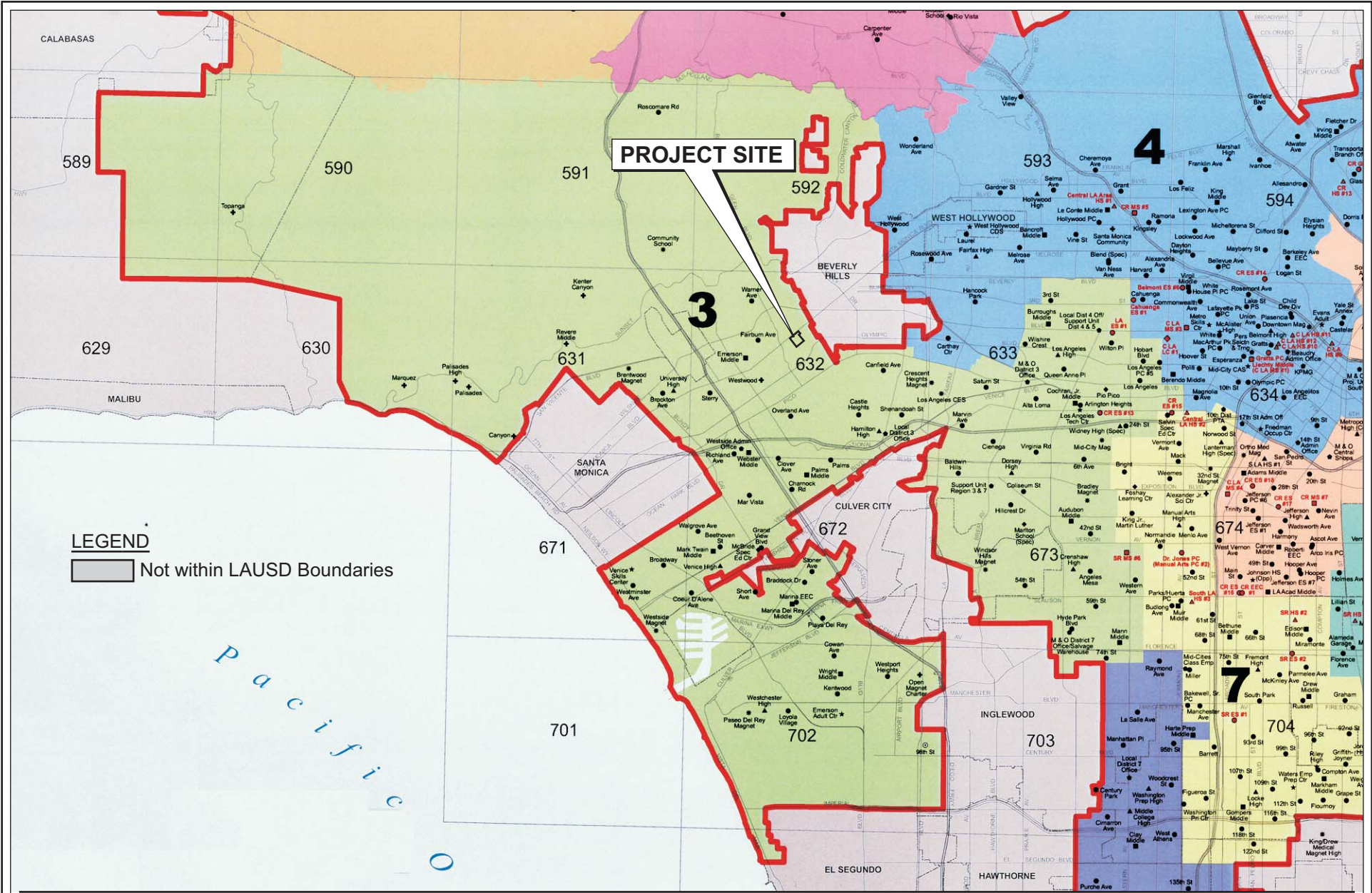
### 3. PROJECT IMPACTS

#### a. Methodology

The analysis of impacts to schools is based in part on the ability of the LAUSD school facilities to accommodate the potential increase in students generated from development of the project. The analysis estimates the number of students that would be generated by the proposed project using LAUSD student generation rates, and focuses on whether LAUSD school facilities expected to serve the project would have sufficient available capacity to accommodate these students. The analysis addresses all levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools).

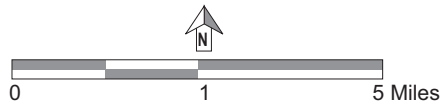
The anticipated number of new students was calculated using student generation rates issued by LAUSD. Once calculated, the number of project-generated students was compared to LAUSD's future forecasted available capacity at each school that serves the project site to identify the extent to which students could be accommodated within these facilities. This analysis is focused on LAUSD District 3 facilities, as impacts to surrounding districts are not anticipated to occur. This conclusion is supported by the circumstances in which project-generated students that attend public schools in other school districts (e.g., Beverly Hills School District) must obtain an inter-district transfer permit issued by both the school within which the

<sup>181</sup> *Los Angeles Unified School District, Strategic Execution Plan of 2007*, <http://www.laschools.org/sep/pdf/executive-summary.pdf>, accessed January 2007.



**LEGEND**

Not within LAUSD Boundaries



Source: LAUSD Board of Education, 2004.

Figure 55  
LAUSD Local District 3 Map

**Table 45****Current Capacity and Enrollment of LAUSD Schools Serving the Project Site**

<b>School</b>	<b>Distance From Project Site</b>	<b>Current Capacity</b>	<b>2006-2007 Enrollment</b>	<b>Available Seating Capacity</b>
Westwood Charter Elementary School (K-5) 2050 Selby Avenue	1.4 miles	879	746	133
Emerson Middle School (6-8) 1650 Selby Avenue	1.4 miles	1,625	1,523	102
Webster Middle School (6-8) 11330 Graham Place	3.1 miles	1,672	1,314	358
University High School (9-12) 11800 Texas Avenue	3.1 miles	2,727	2,505	222

*Source: LAUSD Facilities Services Division, LAUSD Schools Enrollments and Capacities Report, August 30, 2006.*

student is enrolled, as well as the school of interest. Furthermore, approvals for inter-district transfers are subject to a determination that the incoming transfer students could be accommodated without creating an impact on its existing facilities.

### **b. Significance Thresholds**

According to the *City of L.A. CEQA Thresholds Guide (2006)*, the determination of significance is made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).



### **c. Analysis of Project Impacts**

#### **(1) Student Generation**

The LAUSD Developer Fee Program Office has established student generation rates for a variety of uses including residential (single-family detached, single-family attached, and multi-family), retail and services, offices, research and development, industrial/warehouse/manufacturing, hospitals, hotels/motels, and parking structures. As described in Section II., Project Description, of this Draft EIR, the proposed project would result in the development of 262 multi-family residential, apartment or condominium units, as well as a net increase of 358,881 square feet of retail/restaurant and commercial uses and a net increase of 325,962 square feet of parking area. However, the project would remove approximately 360,964 square feet of existing office and develop approximately 106,523 square feet of new office resulting in a net decrease of 254,441 square feet of office uses. LAUSD student generation rates for the aforementioned uses are shown in Table 46 on page 520. Because the proposed project would result in a net reduction of office uses on the site, the student generation for the net decrease in office square footage was subtracted from the student generation for the new office square footage. Based on the change in uses, the proposed project would generate a total of 44 elementary school students, 24 middle school students, and 21 high school students as shown in Table 47 on page 521.

As previously discussed, students generated by the proposed project would attend Westwood Charter Elementary School, Emerson Middle School, Webster Middle School, and University High School. While Westwood Elementary School is a charter school, students within the elementary school attendance boundaries would be expected to attend Westwood Charter Elementary School. Build-out of the proposed project is expected to occur in 2012. Therefore, students generated by the proposed project would likely enroll in these LAUSD schools in the 2011-2012 or 2012-2013 school year. Because, LAUSD limits enrollment forecasts to five-year projections, the latest forecast available is for the 2011-2012 school year. As shown in Table 48 on page 522, all school facilities serving the project site would be operating well below capacity for the 2011-2012 school year with the exception of Westwood Charter Elementary School. During the 2011-2012 school year, Westwood Charter Elementary School would be operating over its capacity by approximately 122 seats. When the project-generated students are added to these projections (44 elementary school students, 24 middle school students, and 21 high school students), all school facilities serving the project site would be able to accommodate the new students with the exception of Westwood Charter Elementary School as shown in Table 48. Westwood Charter Elementary School would result in a shortage of 166 seats (122+44). Because the project site is located in a middle school attendance option area, the 24 middle school students generated by the proposed project would have the option to attend either Emerson or Webster Middle School. If all 24 middle school students choose to attend Emerson Middle School, it would still have an excess of 730 seats (754-24). If all 24 middle school students choose to attend Webster Middle School, it would still have an excess of



Table 46

## LAUSD Student Generation Rates

School Level	Multi-Family (per unit) <sup>a</sup>	Retail and Services (per 1,000 sf)	Office (per 1,000 sf)	Parking Structure (per 1,000 sf)
Elementary School (K-5)	0.1703	0.0251	0.0393	0.0009
Middle School (6-8)	0.0952	0.0121	0.0188	0.0004
High School (9-12)	0.0855	0.0125	0.0195	0.0005

<sup>a</sup> Multi-family units are defined as units with common walls on an Assessor's parcel on which other units are located (e.g. duplexes, triplexes, apartments, etc.).

Source: LAUSD Student Generation Rate Calculation, August 2007 and LAUSD Commercial/Industrial Development School Fee Justification Study, September 2007.

538 seats (562-24). With the addition of the project-generated number of high school students, University High School would still have an excess of 1,163 seats (1,184-21).

Due to the anticipated demographics of the future residents of the project, the project's projected student generation is likely to overstate the actual impact to the school facilities serving the project. Census tract information for the residential developments near the project site indicates that in 2000, there were only 213 total K-12 students enrolled in school among 2,184 households. Approximately two-thirds (63.4 percent) of these students were enrolled in private rather than public schools. Thus, the actual total public school generation rates for this particular area is much smaller than LAUSD's overall generation rates that were used to estimate the number of public school students generated by the project. Furthermore, census tract data also shows that the age of the household heads in owner-occupied units in this area is skewed heavily in the direction of age 55+. Similarly, occupants of the project's residential units would likely be older residents or "empty-nesters". As the anticipated selling prices for the residential units would require higher income residents, to the extent that school age children are present, they would most likely attend private schools rather than LAUSD public schools. Therefore, as the project's projected student generation forecast may be overstating the actual student generation, the analysis presents a conservative analysis of the project's potential impacts on LAUSD facilities. Furthermore, the project's impacts on LAUSD school facilities (i.e., Westwood Charter Elementary School) would be reduced to a less than significant level with the payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code.

## (2) Construction Traffic and Pedestrian Routes

Project-related construction traffic and activities including worker travel, hauling activities, and the delivery of construction materials would not affect existing school traffic,

Table 47

## Estimated Number of Students To Be Generated by the Proposed Project

Land Use	Net New Units or Square Footage	No. of Students Generated		
		Elementary School (K-5)	Middle School (6-8)	High School (9-12)
Multi-Family	+262 units	+45	+25	+22
Retail and Services	+358,881 sf	+9	+4	+4
Parking Structure	+325,962 sf	+0 <sup>a</sup>	+0 <sup>a</sup>	+0 <sup>a</sup>
Office	-254,441 sf	-10	-5	-5
<b>Total</b>		<b>+44</b>	<b>+24</b>	<b>+21</b>

<sup>a</sup> Rounded to the nearest whole number.

Source: PCR Services Corporation, January 2007.

pedestrian routes, or transportation safety in the project vicinity as there are no schools adjacent to the project site. As discussed in Section IV.J. Traffic and Circulation of this document, the proposed haul routes for construction related transport would occur via major arterials in the project vicinity and would not pass in front of any schools. These major arterials include Santa Monica Boulevard, Avenue of the Stars, Constellation Boulevard, westbound Pico Boulevard, and southbound Overland Avenue. Furthermore, construction worker-related traffic would be largely freeway oriented by use of the San Diego (I-405) or Santa Monica (I-10) Freeways and would be during off-peak hours. Based upon the LAUSD Pedestrian Route Maps provided by the City of Los Angeles Department of Transportation, haul routes would not interfere with school pedestrian routes at Westwood Charter Elementary, Emerson Middle School, or Webster Middle School.<sup>182</sup> Haul routes would not interfere with school pedestrian routes associated with University High School, as it is located west of the I-405 Freeway and north of Santa Monica Boulevard. In addition, construction staging and construction-related vehicle parking would occur on-site, and not on or near school property. Safety and security would be maintained throughout project construction, as construction activities would adhere to all applicable standard construction standards including the California Vehicle Code. Project-related construction would not alter existing traffic patterns or result in any significant traffic impacts. Therefore, school bus routes and pedestrian routes would not be negatively affected.

### (3) Consistency with Applicable Regulations

The proposed project would be required to comply with SB 50, which requires payment of fees to mitigate the project's impacts on LAUSD. Payment of the SB 50 fees would ensure consistency of the proposed project with applicable regulations.

<sup>182</sup> City of Los Angeles- Department of Transportation. <http://www.lacity.org/ladot/RoutesToSchool.htm>, accessed February 1, 2007.

Table 48

**Projected Capacity and Enrollment of LAUSD Schools Serving the Project Site with Proposed Project**

<b>School</b>	<b>Projected Capacity<sup>a</sup></b>	<b>Projected 2011-2012 Enrollment<sup>b</sup></b>	<b>Projected Seating Overage/(Shortage)</b>	<b>Project-Generated Students</b>	<b>Unmitigated Project Impact?</b>
Westwood Charter Elementary School (K-5) 2050 Selby Avenue	687	809	(122)	44	Yes
Emerson Middle School (6-8) 1650 Selby Avenue	1,391	637	754	24 <sup>c</sup>	No
Webster Middle School (6-8) 11330 Graham Place	1,556	994	562		
University High School (9-12) 11800 Texas Avenue	2,296	1,112	1,184	21	No

<sup>a</sup> Based on a 5-year projection that takes into consideration the operational goals of the New School Construction Program (i.e., full-day kindergarten, reduced class sizes, etc).

<sup>b</sup> Based on a 5-year projection of the total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.

<sup>c</sup> The proposed project is located in a middle school attendance option area. Therefore, the project-generated students could potentially attend either Emerson or Webster Middle School.

Source: LAUSD Facilities Services Division, LAUSD Schools Enrollments and Capacities Report, August 30, 2006.

#### 4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 108 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative impact analysis on schools, only those related projects located within the attendance boundaries of the schools serving the project site (Westwood Charter Elementary School, Emerson Middle School, Webster Middle School, and University High School) have been considered. Moreover, related projects that are located within the attendance boundaries but do not constitute uses that typically generate students (i.e., theaters, private schools, or senior housing) were also excluded from the analysis, as such uses would not be expected to generate students within a public school. This belief is further supported by the fact that LAUSD does not employ generation rates for such uses.

Of the 108 related projects identified in Section III, 50 are included in this cumulative analysis as listed in Table 49 on page 523. These related projects would cumulatively generate, in conjunction with the proposed project, new students at Westwood Charter Elementary School, Emerson Middle School, Webster Middle School, and University High School. The related projects include various residential, commercial/retail, and office uses. Similar to the proposed project, the number of students anticipated to be generated by related projects was estimated based on the type of development proposed. As shown in Table 49, related projects could

Table 49

## Related Projects Within Attendance Boundaries of LAUSD Schools Serving the Project Site

Map No. <sup>a</sup>	Project	Location	No. of Students Generated		
			Elementary School (K-5) <sup>b,c,d</sup>	Middle School (6-8) <sup>b,c,d</sup>	High School (9-12) <sup>b,c,d</sup>
1	UCLA Westwood Campus Expansion	UCLA Westwood Campus	0	12	13
2	FBI Office	11000 Wilshire Blvd.	0	0	0
3	Palazzo Westwood	1001 Tiverton Ave.	0	34	31
4	Retail, High-Turnover Restaurant, Medical Office, Theater	Southeast corner of Broxton Ave. and Le Conte Ave.	0	1	1
6	Apartments, Specialty Retail	10852 Lindbrook Ave.	0	2	2
7	Apartments	860 S. Devon Ave.	0	2	2
8	Condominiums	10804 Wilshire Blvd.	0	2	3
9	Condominiums	10776 Wilshire Blvd.	0	3	4
11	Fox Studio Expansion	10201 W. Pico Blvd.	14	7	0
14	Wilshire/Comstock Condominium Project	10250 W. Wilshire Blvd.	0	1	1
15	ABC Entertainment Center	2000 Ave. of the Stars	31	15	0
16	St. Regis Redevelopment Project	2055 Ave. of the Stars	8	4	0
17	Condominiums	527 S. Midvale St.	0	4	5
18	Residential Hotel	10844 W. Lindbrook Dr.	2	1	1
19	Health/Fitness Center	10960 W. Wilshire Blvd.	0	0	0
20	Condominiums	1826 S. Glendon Ave.	1	0	0
21	Condominiums	1417 S. Butler Ave.	0	0	0
23	Condominiums	1625 S. Barry Ave.	0	0	1
24	Condominiums	1525 S. Armacost Ave.	0	0	1
25	Condominiums	1633 S. Armacost Ave.	0	0	0
26	Condominiums	10763 W. Wilshire Blvd.	0	1	2
27	Condominiums	2037 S. Beverly Glen Blvd.	1	0	0
28	Office	12233 Olympic Blvd.	0	6	6
29	Condominiums	1511 S. Camden Ave.	0	0	0
30	Condominiums, Office, Specialty Retail	11663 Wilshire Ave.	0	0	2
32	Condominiums	10617 W. Eastborne Ave.	0	0	0
33	Condominiums	1517 S. Bentley Ave.	0	0	1
34	Apartment	1817 S. Beloit Ave.	0	1	1
35	Live/Work Units	11500 W. Tennessee Ave.	0	2	3
36	Condominiums	430 S. Kelton Ave.	0	1	1
37	Restaurant	10935 W. Weyburn Ave.	0	0	0
38	Condominiums	1807 S. Beverly Glen Blvd.	1	0	0
39	Condominiums	2263 S. Fox Hills Dr.	1	0	0
41	Bank	1762 Westwood Blvd.	0	0	0
42	Westside Pavilion Renovation	10850 Pico Blvd.	0	9	9
44	Condominiums	10131 Constellation Blvd.	23	11	15
45	Discounted Store	11840 Olympic Blvd.	0	1	1
48	Apartments	10000 W. Santa Monica Blvd.	71	33	30

Table 49 (Continued)

## Related Projects Within Attendance Boundaries of LAUSD Schools Serving the Project Site

Map No. <sup>a</sup>	Project	Location	No. of Students Generated		
			Elementary School (K-5) <sup>b,c,d</sup>	Middle School (6-8) <sup>b,c,d</sup>	High School (9-12) <sup>b,c,d</sup>
49	Apartment, Retail	10901 Santa Monica Blvd.	0	3	4
52	Office	1100 Westwood Blvd.	0	1	1
53	Del Capri Hotel	Wilshire Blvd/Westholme Ave.	0	8	9
54	Condominiums	11611 Montana Ave.	0	0	0
55	Office	11677 Wilshire Blvd.	0	0	3
56	Retail	11305 Santa Monica Blvd.	0	0	0
57	Auto Service	10461 Santa Monica Blvd.	0	0	0
58	Office	Southwest corner of Santa Monica Blvd. and Beverly Glen Ave.	0	0	0
59	Fast Food Restaurant and Snack Shop	10867 Santa Monica Blvd.	0	0	0
61	Brentwood Retail Center Project	1171 Gorham Ave.	0	0	0
62	Olympic Stoner Retail Center	11785 Olympic Blvd.	0	0	0
63	Condominiums	10710 Wilshire Boulevard	0	0	2
<b>Related Projects Total</b>			<b>153</b>	<b>165</b>	<b>155</b>
<b>Proposed Project Total</b>			<b>44</b>	<b>24</b>	<b>21</b>
<b>Grand Total</b>			<b>197</b>	<b>189</b>	<b>176</b>

<sup>a</sup> Corresponds with Figure 15 on page 153 in Section III of this Draft EIR.

<sup>b</sup> Calculated by multiplying each of the proposed uses by its respective student generation rate issued by LAUSD. LAUSD has established student generation rates for residential (single-family detached, single-family attached, and multi-family), retail and services, offices, research and development, industrial/warehouse/manufacturing, hospitals, hotels/motels, and parking structures.

<sup>c</sup> Please note that the attendance boundaries are not the same for all three levels of schools. A related project may be located within the attendance boundaries of the elementary school (Westwood Charter Elementary School) but not within the attendance boundaries of the high school (University High School). This was taken into consideration when conducting the calculations presented.

<sup>d</sup> In some instances the number of students generated is <1 and therefore shown as 0.

Source: PCR Service Corporation, 2007.

potentially generate 153 elementary school students, 165 middle school students, and 155 high school students. The proposed project in conjunction with related projects could therefore generate 197 elementary school students, 189 middle school students, and 176 high school students. As shown in Table 48 above, all school facilities would be able to accommodate these new students with the exception of Westwood Charter Elementary School. Westwood Charter Elementary School would result in a shortage of 319 seats (122+197). If all middle school students choose to attend Emerson Middle School, it would still have an excess of 565 seats

(754-189). If all middle school students choose to attend Webster Middle School, it would still have an excess of 373 seats (562-189). University High School would still have an excess of 1,008 seats (1,184-176). As previously discussed, pursuant to Government Code Section 65995, the payment of the developer fees under the provisions of SB 50 would constitute full mitigation for all impacts to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be less than significant.

## **5. MITIGATION MEASURES**

Although the proposed project would generate 44 elementary schools students which would result in potentially significant impacts to Westwood Charter Elementary School given its projected capacity, pursuant to Government Code Section 65995 and in compliance with SB 50 (payment of developer fees) all project-related impacts would be reduce to a less than significant level. Therefore, no other mitigation measures are required.

## **6. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

As discussed above, compliance with SB 50 (payment of developer fees) would reduce all project-related impacts to a less than significant level.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**I. PUBLIC SERVICES**  
**4. LIBRARIES**

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**1. INTRODUCTION**

This section addresses potential impacts on the library facilities and services administered by the City of Los Angeles Public Library (LAPL). The analysis is based in part on information provided by the City of Los Angeles, Library Facilities Division.

**2. ENVIRONMENTAL SETTING**

**a. Regulatory Framework**

**(1) Los Angeles General Plan Framework**

The City of Los Angeles General Plan Framework, adopted in December 1996 and again in August 2001, provides general guidance regarding land use issues for the entire City of Los Angeles and defines Citywide policies regarding land use, including infrastructure and public services. Goals and policies for the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21. Objective 9.20 proposes to adopt a citywide library service standard by the year 2000. Policy 9.20.1 proposes the development of library standards dealing with the facilities' net floor area, the appropriate number of permanent collection books per resident, and service radii. Policy 9.20.2 proposes a Citywide policy for locating non-English language permanent collections.<sup>183</sup> The General Plan Framework Implementation Programs-Plans and Policies, Policy 13, holds the Department of Libraries responsible for updating the Library Master Plan as well as providing sufficient capacity to correct existing deficiencies, identifying improvements to new library facilities, developing strategies to increase the distribution of library services, establishing a new City library service standard based on the needs of the City, and identifying funding sources for facility improvements.<sup>184</sup>

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<sup>183</sup> *City of Los Angeles, General Plan Framework, adopted in December 1996 and re-adopted in August 2001.*

<sup>184</sup> *Ibid.*

The plans and implementation policies set forth in the General Plan Framework have been addressed through the Los Angeles Library Branch Facilities Plan and the 1989 and 1998 Library Bond Program.

## **(2) Los Angeles Public Library Branch Facilities Plan**

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) guides the construction, maintenance, and organization of public libraries and specifies standards in defining geographic service areas and the size of branch facilities. The Facilities Plan was revised and recently approved by the Board of Library Commissioners on February 8, 2007. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. Under the Facilities Plan, the service population for branch libraries is defined according to total floor area, as shown in Table 50 on page 528.

The Facilities Plan has been implemented with bond measures within two phases, the 1989 Bond Program and the 1998 Bond Program. In 1989, City of Los Angeles voters approved Proposition 1, also known as the 1989 Library Bond Issue, a \$53.4 million library bond which proposed obtaining new sites for building, renovating, and expanding libraries that are unable to serve the community sufficiently and/or were damaged by the Sylmar earthquake. The LAPL also successfully obtained additional funds from the Community Development Block Grant award of Federal funds from the California State Library Proposition 85, and from Friends of the Library groups for a total branch construction program of \$108 million. Under this 1989 Bond Program, 29 libraries were built.<sup>185</sup>

On November 3, 1998, Los Angeles voters approved a second bond measure, Proposition DD, also known as the 1998 Library Facilities Bond, a \$178.3 million bond for funding towards building, improving, renovating, and expanding 32 branch libraries throughout Los Angeles. The 1998 Library Branch Facilities Program, which described the funding, sizes, and geographic locations for new or renovated branch libraries, served as the basis for Proposition DD and the 1998 Library Bond Program. The original 32 projects were built on time and under budget. Thus, four additional projects were then added to the scope of the total facilities program between September 2002 and June 2004 due to the Library Branch Facilities Program's success and effective management, Friends of the Library contributions, and a California State Library Proposition 14 grant for a total construction program of \$226.3 million. Of the 36 total projects under the 1998 Bond Program, the original 32 projects have been completed within the six-year

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<sup>185</sup> *Summary of Branch Facilities Plan Revision*, [http://www.lapl.org/about/planning\\_overview.html](http://www.lapl.org/about/planning_overview.html), accessed March 12, 2007.



**Table 50****City of Los Angeles Public Library Branch Building Size Standards**

<b>Population Served</b>	<b>Size of Facility</b>
Above 45,000	14,500 sq.ft. <sup>a</sup>
Below 45,000	12,500 sq.ft.

<sup>a</sup> Based on Criteria for New Libraries [http://www.lapl.org/about/Branch\\_Facilities\\_Criteria.pdf](http://www.lapl.org/about/Branch_Facilities_Criteria.pdf), accessed February 12, 2007.

Source: Fax communication with Rona Berns with the LAPL Library Services Division. The revised Branch Facilities Plan was approved by the Board of Library Commissioners on February 8, 2007.

schedule with a majority built under budget. Of the four additional projects, two have been completed, one project is currently under construction, and one is in the Bid & Award phase.<sup>186</sup>

Both the Palms–Rancho Park Branch Library completed in 2002 and the Westwood Branch Library completed in 2005 were funded by the 1998 bond measure.

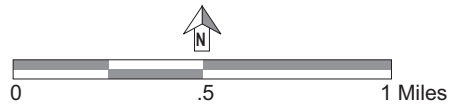
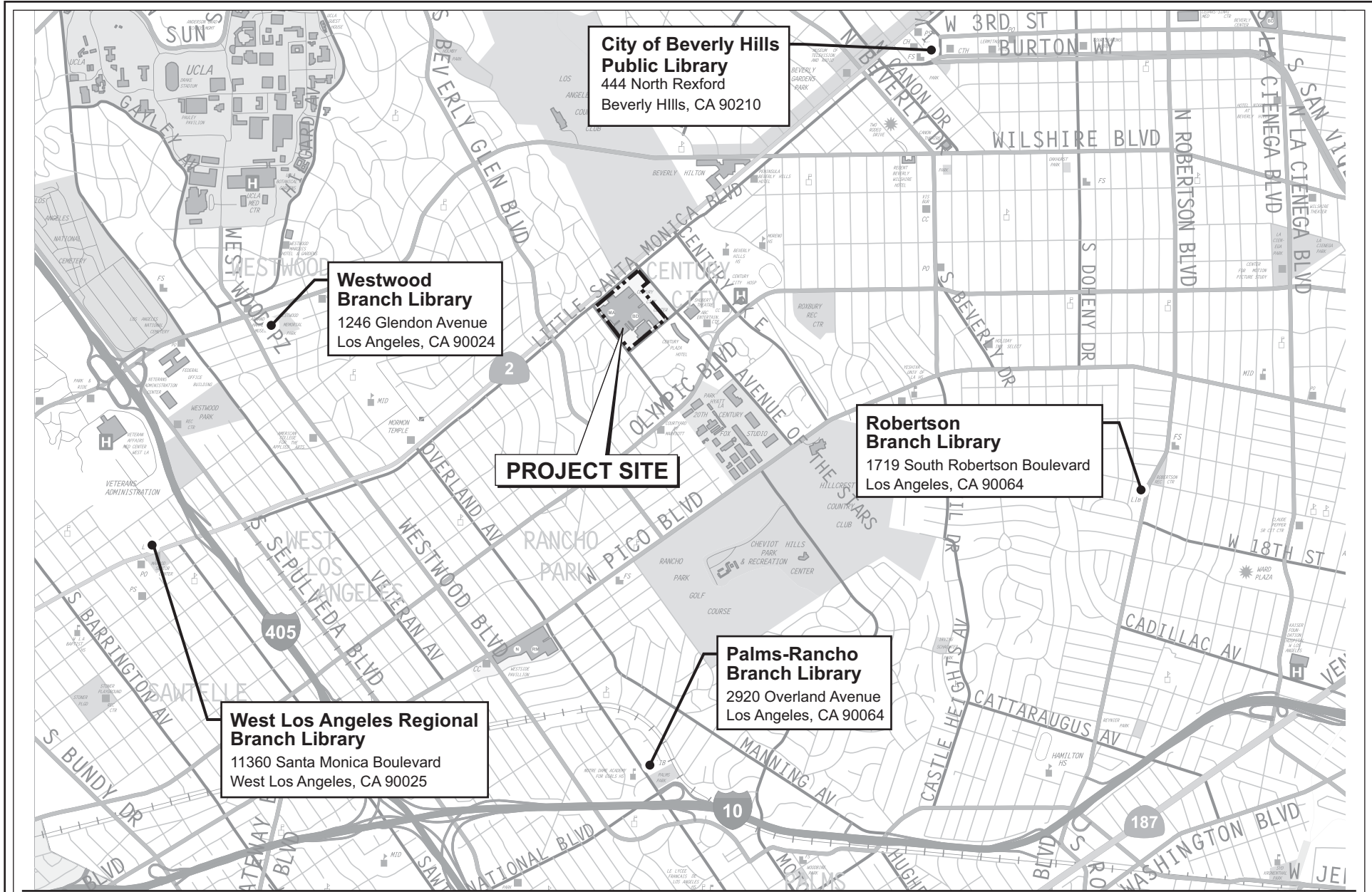
The LAPL is a member of the Metropolitan Cooperative Library System (MCLS), an association of public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. The LAPL also participates with other library systems in the “Library of California,” a network of public and private California libraries. Participation in these programs allows individuals to use their library cards in multiple jurisdictions, and for member libraries to receive compensation for such use.

### **b. Existing Conditions**

The LAPL system provides library services to all areas in the City of Los Angeles and is also the largest system of public libraries for any city in our nation. The LAPL consists of the Richard J. Riordan Central Library and 71 branch libraries, with an inventory of over 6 million books and 2,100 “virtual-library” computer workstations with access to the Internet and electronic databases.

LAPL service populations are based on the number of people residing in census tracts that are assigned to a specific library. Currently there are no community branch libraries for the Century City area. However, the LAPL has identified the Westwood Branch Library and the Palms–Rancho Park Branch Library as the library facilities that would serve the Century City area, including the project site. Figure 56 on page 529 identifies the locations of the existing

<sup>186</sup> LAPL 1998 Library Bond Program Quarterly Report – January 2007, accessed March 12, 2007.



Source: PCR Services Corporation, 2007.

Figure 56  
Libraries Located in the  
Vicinity of the Project Site

public library facilities nearest to the project site. Table 51 on page 531 provides information regarding the two public libraries that would directly serve the project site including size of facilities, population served, and hours of operation.

The Westwood Branch Library opened in May 2005 and consists of a total of 12,500 square feet. The library is located at 1246 Glendon Avenue, approximately 2.7 miles west from the project site. The Westwood Branch Library has 12 staff positions, and a service population of 69,154 according to the 2000 US Census. The library currently holds a collection of 49,500 books. The Palms-Rancho Park Branch Library opened in November 2002 and consists of a total of 10,500 square feet. The library is located at 2920 Overland Avenue, approximately 2.7 miles south of the project site. The Palms-Rancho Park Branch Library has 12.25 staff positions, and a service population of 68,167 based on the 2000 US Census. The library has a literature collection of 46,300.<sup>187</sup> Currently both the Westwood Branch Library and the Palms-Rancho Park Branch Library adequately meet the demand for library services in their respective communities.

Other libraries that could potentially serve project residents include the Robertson Branch Library, the West Los Angeles Regional Branch Library, and the City of Beverly Hills Public Library. The Robertson Branch Library is located at 1719 South Robertson Boulevard, approximately 2.8 miles southeast of the project site. This branch is 10,000 square feet in size and can serve a population of up to 35,000 people. The West Los Angeles Regional Branch Library is located at 11360 Santa Monica Boulevard, approximately 2.6 miles west of the project site. This branch library has 13,740 square feet of floor area and can serve a population of up to 100,000 people. As a regional library, this library supplements the services provided by the local branch libraries. The West Los Angeles Regional Branch Library maintains extended service hours and is also open on Sundays. The City of Beverly Hills Public Library is also a participant in the Metropolitan Cooperative Library System (MCLS), which allows patron use from other participating jurisdictions. In addition, under the MCLS program, the City of Beverly Hills Public Library accepts library cards from LAPL cardholders. The Beverly Hills Public Library is located at 444 North Rexford Drive, approximately 1.9 miles northeast of the project site.

### **3. PROJECT IMPACTS**

#### **a. Methodology**

Potential project impacts on library services and facilities are determined based on identifying the primary service library or libraries that serve the project site, forecasting the

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<sup>187</sup> Letter correspondence from Rona Berns, LAPL Library Facilities Division, October 16, 2006.

**Table 51****Direct LAPL Library Facility Services to the Project Site**

<b>Branch</b>	<b>Size (sq. ft.)</b>	<b>Service Population</b>	<b>Hours of Operation</b>
Westwood	12,500	69,154	12:30 P.M. to 8:00 P.M. Monday and Wednesday 12:30 P.M. to 8:00 P.M. Tuesday and Thursday 10:00 A.M. to 5:30 P.M. Friday and Saturday
Palms–Rancho Park	10,500	68,167	10:00 A.M. to 8:00 P.M. Monday and Wednesday 12:00 P.M. to 8:00 P.M. Tuesday and Thursday 10:00 A.M. to 6:00 P.M. Friday and Saturday

*Source: Letter correspondence from Rona Berns, LAPL Library Facilities Division, October 16, 2006.*

number of residents generated by the project, identifying the population within the library's service area at the time of project build-out, combining the project's resident population with the forecasted service area population, and comparing the combined population to the service population for the library as determined by the Los Angeles Public Library.

### **b. Significance Thresholds**

According to the *City of L.A. CEQA Thresholds Guide (2006)*, determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project.
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand.
- Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).

### **c. Analysis of Project Impacts**

The proposed project would generate a population of approximately 553 residents.<sup>188</sup> As there is no community branch library for the Century City area, the LAPL has identified the Westwood Branch Library and the Palms–Rancho Park Branch Library as the libraries that

<sup>188</sup> Based on the 2005 West Los Angeles Community Plan household population data of 2.11 persons per unit.

would serve the project site. The LAPL bases the anticipated service population for a branch on census tracts that are assigned to that branch. Based upon the 2000 US Census, the number of residents that would be served by the Westwood Branch Library, and the Palms-Rancho Park Branch Library, in 2010 is 76,725, and 75,149, respectively. The number of residents that would be served by the Westwood Branch Library, and the Palms-Rancho Park Branch Library, in 2015 is 77,768, and 76,175, respectively.<sup>189</sup> These numbers represent an annual growth factor of 0.27 percent; based on this annual growth factor, the expected number of persons that would be served by the Westwood and Palms–Rancho Park Branch Libraries in year 2012 (buildout year of the proposed project) are 77,140 and 75,555 persons, respectively.

Assuming that in year 2012 project residents would utilize the Westwood Branch Library as it is the library located nearest the site, the expected number of residents served by the Westwood Branch Library in 2012 combined with the project’s estimated population would be 77,693 people. Thus, the project’s demand for library facilities would represent less than a one percent increase in the demand for library facilities at the Westwood Branch library. Therefore, the project would result in a nominal increase in the demand for library facilities at the Westwood Branch Library. The project’s estimated population combined with the expected number of residents served by the Palms-Rancho Park Branch Library at buildout would be 76,108 people. This increased demand for library services at the Palms-Rancho Park Branch Library resulting from the project would also represent less than a one percent increase in the demand for library services. As identified by the LAPL, both the Westwood Branch and Palms-Rancho Park Branch Libraries currently adequately meet the demand for library services within their respective communities. Thus, since the increased demand generated by the project would be nominal, impacts on these library facilities would be less than significant. Furthermore, the project residents would be eligible to use the array of technical, arts, and general libraries on the UCLA campus, which is located less than two miles from the project site. Also, under the MCLS, residents would be eligible to use the City of Beverly Hills Public Library, which is geographically close to Century City and approximately 1.25 miles from the project site. However, with the range and depth of City of Los Angeles and UCLA library resources within a short distance from the project site, the project is not anticipated to have a significant impact on the City of Beverly Hills Public Library. Use of the other library facilities in the project vicinity would further reduce the project’s demand on the Westwood Branch and the Palms-Rancho Park Branch libraries.

#### 4. CUMULATIVE IMPACTS

Of the 108 related projects identified in Section III of this Draft EIR, 63 projects are located within the City of Los Angeles, and 45 projects are located within the Westwood Branch Library service area. Of the 45 projects within the library service area, 30 are residential

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<sup>189</sup> *Telecommunication with Rona Berns, Library Facilities Division, April 17, 2007.*

projects, and would provide a total of 2,327 residential units. For the purpose of this cumulative impact analysis, only residential projects have been considered. These projects would generate a population of approximately 4,435 persons within the Westwood Branch Library service area. With the addition of the project's estimated population of 553 residents, the total new residents in the Westwood Branch Library service area would be 4,988. Added to the expected service population in 2012 of 77,140 persons in the Westwood community, the total service population for the Westwood Branch Library would be approximately 82,128 persons. However, this number is significantly overstated as it does not consider that much of the growth associated with the project and the related projects is already accounted for in the service population projections made by the LAPL. In addition, it would be expected that other projects would implement measures as necessary to ensure that their respective impacts on library facilities are less than significant. Therefore, cumulative growth anticipated in the community, including the proposed project, would not cause a future population that would exceed the Westwood Branch Library expected service population.

There are nine related projects within the Palms-Rancho Park Branch Library service area. Three of the nine projects are residential uses, which would provide a total of 128 residential units and generate a population of approximately 262 persons. With the addition of the 553 residents generated by the proposed project, a total of 815 additional people would be in the Palms-Rancho Park Branch Library service area. Added to the expected 2012 service population of 75,555, the total service population for the Palms-Rancho Park Branch Library service area would be 76,370. However, this number is significantly overstated as it does not consider that much of the growth associated with the project and related projects is already accounted for in the service population projections made by the LAPL. In addition, it would be expected that other projects would implement measures as necessary to reduce their respective impacts on library facilities. Furthermore, given that the Westwood Branch Library is closer to the site, it is expected that the project's residents would likely utilize that library more. Therefore, it is concluded that cumulative impacts relative to Palms Rancho Park Branch Library would be less than significant.

## **5. MITIGATION MEASURES**

Potential impacts to libraries would be less than significant; therefore, no mitigation measures are necessary.

## **6. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The proposed project would not result in a significant impact to library services and facilities. No mitigation measures are necessary.

The proposed project in conjunction with related projects would not result in a significant cumulative impact to library services and facilities. No mitigation measures are necessary.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**I. PUBLIC SERVICES**  
**5. PARKS AND RECREATION**

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**1. INTRODUCTION**

This section analyzes the potential impacts of the proposed project with regard to the parks and recreation facilities that would serve the project's future residents. The analysis evaluates the project's provisions for park and recreation facilities compared to applicable City goals and regulatory requirements. Information regarding existing service ratios, as well as existing parks and recreational facilities surrounding the project site, was provided in part by the Los Angeles Department of Recreation and Parks.

**2. ENVIRONMENTAL SETTING**

**a. Regulatory Framework**

**(1) State Level**

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, dedications of land shall not exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. As the parkland standard is not exceeded in the project area, the maximum exaction for the proposed project under the Quimby Act is three acres of parkland per 1,000 persons. Los Angeles Municipal Code (LAMC) Section 17.12 was authorized to ensure compliance with the Quimby Act. Compliance with the Quimby Act is discussed below as set forth in Section 17.12 of the LAMC.

## (2) Local Level

The City of Los Angeles General Plan indicates that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities. In addition to the standards established in the PRP, park and open space requirements pursuant to the Quimby Act are also set forth in Sections 12.21 and 17.12 of the LAMC. The following provides information regarding both the PRP and applicable LAMC standards and requirements.

### (a) Public Recreation Plan

Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts.<sup>190</sup> To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radii and projected population levels.

According to the standard park characteristics identified in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks include neighborhood and community recreation sites, open space, and "small" parks, which are usually characterized as less than one acre in size. A neighborhood park typically provides space and facilities for outdoor and indoor recreation activities intended to serve residents of all ages within the immediate neighborhood. Neighborhood parks typically include a recreation building, multi-purpose field, hard court area, play apparatus, picnic area, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be ten acres, such parks within the City of Los Angeles are typically one to five acres in size. Community parks, considered regional facilities, are designed to serve residents of all ages in several surrounding neighborhoods and include such facilities as a community building, multi-purpose fields, hard

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<sup>190</sup> *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.*



court areas, parking, maintenance service areas, and play areas. These facilities may also include baseball diamonds, football and soccer fields, tennis and handball courts, and a swimming pool. According to the PRP, the ideal size for a community park is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for neighborhood and community park and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile, and a minimum of two acres per 1,000 persons for community parks with a service radius of two miles. However, the PRP also notes that these long-range standards may not be reached during the life of the PRP, and therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two mile service radius for community parks. The PRP also establishes that no park or recreational facility shall be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or the need is diminished due to population and/or land use changes.

#### **(b) Los Angeles Municipal Code**

Section 12.21.G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is an area which is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

Section 17.12 of the LAMC, authorized under the Quimby Act, which requires developers to set aside land, donate conservation elements, or pay fees for park improvements, provides standards for parkland acreage requirements and identifies fees per unit. The area of

land within a subdivision that is required to be dedicated for park and recreation uses is determined by the maximum residential density permitted by the zone within which the site is located. The project site is located within a C2, which allows residential development pursuant to the standards established for the R4 zone. Therefore, the site provides for a maximum density of over 100 dwelling units per acre. Thus, based on the provisions set forth in LAMC Section 17.12, 32 percent of the gross subdivision area would be required to be dedicated.

Section 17.12.F of the LAMC allows private recreation areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.

#### **b. Existing Conditions**

The City of Los Angeles Department of Recreation and Parks (the Department) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the project vicinity. Currently, the Department maintains and operates more than 390 sites for recreational use including: 180 recreation centers, 59 swimming pools, 13 municipal golf courses, nine lakes, seven camps both in and out of town, more than a dozen museums and historic sites, and hundreds of programs for youth, senior, physically disabled, and volunteers. The Department also administers more than 15,600 acres of parkland, including 4,217 acres in Griffith Park, one of the largest municipal parks within the boundaries of an American city.<sup>191</sup> In addition, the Century City area is rich in its provision of parks and recreation opportunities. In the immediate proximity to the site is the Los Angeles Country Club to the north, the Cheviot Hills Park and Recreation Center to the south, the Rancho Park Golf Course to the south and Roxbury Park to the east.

The City of Los Angeles has an estimated City-wide ratio of 0.76 acre of neighborhood and community parkland per 1,000 residents. More specifically, the West Los Angeles Community Plan Area, which includes Century City, has an estimated community ratio of 0.77 acre of neighborhood and community parkland per 1,000 residents.<sup>192</sup> These ratios do not

<sup>191</sup> *Los Angeles Department of Recreation and Parks*, <http://www.laparks.org/dept/who.htm>, accessed March 2007.

<sup>192</sup> *Los Angeles Department of Recreation and Parks, Request for Information*, dated November 1, 2006.

meet the City’s short- and intermediate-range neighborhood and community parkland standards under the PRP of one acre per 1,000 persons within a one-mile service radius for neighborhood parks, and one acre per 1,000 persons within a two-mile radius for community parks.<sup>193</sup> According to the Department, the project site is located in a heavily populated area in which high numbers of youth, families, and seniors utilize local parks and recreational facilities. Table 52 on page 539 lists the parks and recreational facilities located within three miles of the project site, which would likely serve the residents of the proposed project. Figure 57 on page 541 depicts the location of these facilities in relation to the project site. As noted in Table 52 and Figure 57, some of these parks and recreational facilities are located in the City of Beverly Hills.

### 3. PROJECT IMPACTS

#### a. Methodology

The analysis of parks and recreation impacts is based on comparing the park and open space ratio associated with the project to the standards set forth by the Quimby Act, the PRP, and the LAMC. To be consistent with the standards set forth in the aforementioned regulatory guidance documents, the analysis of impacts is based on the acreage of open space available per the project’s estimated residential population.

#### b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006)*, the determination of significance is made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project’s proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

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<sup>193</sup> *Ibid.*

Table 52

## Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site

Map No.	Name and Address	Distance From Project Site	Type of Park	Size	Amenities
<b>City of Los Angeles</b>					
1	<b>Cheviot Hills Park and Recreation Center</b> 2511 Motor Ave.	1.2 miles	Community	40 acres	Auditorium, barbecue pits, lighted and unlighted sports fields, lighted indoor and outdoor basketball courts, a children's play area, a community room (capacity of 80 to 100 persons), an indoor gym, picnic area, indoor volleyball courts, an archery range, petanque courts, tennis courts, and an amphitheater
2	<b>Rancho Park Golf Course</b> 10460 West Pico Blvd.	1.6 miles	Regional	144.34 acres	9 hole, par 3 public golf course, double deck driving range, and a full size 18-hole golf course
3	<b>Holmby Park and Armand Hammer Pitch and Putt Golf Course</b> 601 Club View Dr.	2.3 miles	Neighborhood	8.48 acres	Barbeque pits, children's play area, picnic tables, 18-hole golf course, bowling greens, jogging path, and a waterfall
4	<b>De Neve Square Park</b> 314 Beverly Glen Blvd.	2.4 miles	Neighborhood	2 acres	Not listed
5	<b>Irving Schachter Park</b> 2599 Beverwil Dr.	2.5 miles	Small	0.75 acre	Does not offer any specialized recreational facilities
6	<b>Westwood Park and Recreation Center</b> 1350 South Sepulveda Blvd.	2.7 miles	Community	26.69 acres	Barbeque pits, lighted baseball diamond, indoor and outdoor basketball courts, children's play area, community room, indoor gym (without weights), picnic tables, and a boundless playground for wheelchair bound visitors
7	<b>Palms Park</b> 2950 Overland Ave.	2.7 miles	Neighborhood	4.44 acres	Palms Recreation and Child Care Center, auditorium, picnic area, playground, basketball courts, and the Palms-Rancho Park Library
8	<b>Robertson Recreation Center</b> 1641 Preuss Road	2.7 miles	Neighborhood	1.21 acres	Lighted outdoor basketball courts, lighted handball courts, children's play area, community room, indoor gym (without weights), and picnic tables
<b>City of Beverly Hills</b>					
9	<b>Beverly Gardens Park</b> Along Santa Monica and Wilshire Blvds.	0.75 mile	Community	1.9 linear miles	Jogging path and walking paths, various gardens, arbors, and fountains

Table 52 (Continued)

## Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site

Map No.	Name and Address	Distance From Project Site	Type of Park	Size	Amenities
10	<b>Roxbury Park</b> 471 South Roxbury Dr.	1.1 miles	Community	Not listed	Lighted tennis courts, baseball diamond/soccer field, basketball courts, sand volleyball courts, lawn bowling, croquet, putting green, picnic tables, and children's play area
11	<b>Maltz Park</b> 9800 Sunset Blvd.	2.3 miles	Mini	Not listed	Playgrounds and fountains
12	<b>Will Rogers Memorial Park</b> 9650 Sunset Blvd.	2.5 miles	Neighborhood	Not listed	Not listed

Source: PCR Services Corporation, 2007.

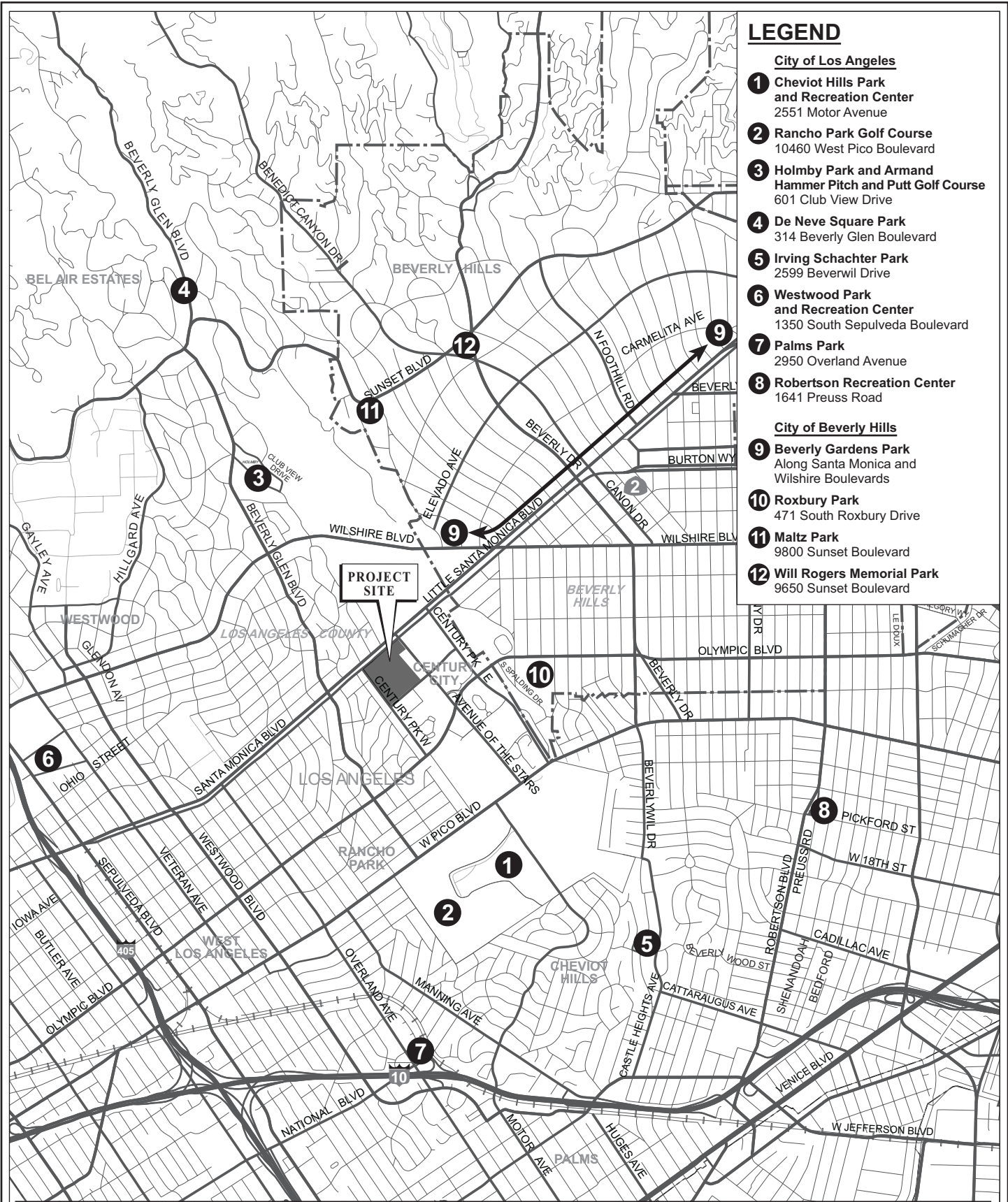
### c. Project Design Features

Common open space and indoor recreational amenities for residents of the proposed project would be provided on levels one and/or two of the residential tower (levels five and six if counting from the plaza level). The open space component would consist of a 46,000-square foot rooftop terrace located above the new retail at 1801 Avenue of the Stars; the area of this terrace in and of itself satisfies the City of Los Angeles' residential open space requirement. Additionally, private open space would be provided within individual units via a balcony.

### d. Analysis of Project Impacts

#### (1) Public Recreation Plan

The PRP's desired long-range Citywide standard for local parks is two acres per 1,000 persons within a half-mile radius for neighborhood parks and two acres per 1,000 persons within a two-mile radius for community parks. However, as discussed above, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short and intermediate-range standards of one acre per 1,000 persons within a one-mile radius for neighborhood parks and one acre per 1,000 persons within a two-mile radius for community parks. Additionally, the State's Quimby Act allows a local



**LEGEND**

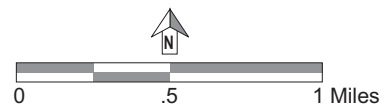
**City of Los Angeles**

- 1 Cheviot Hills Park and Recreation Center  
2551 Motor Avenue
- 2 Rancho Park Golf Course  
10460 West Pico Boulevard
- 3 Holmby Park and Armand Hammer Pitch and Putt Golf Course  
601 Club View Drive
- 4 De Neve Square Park  
314 Beverly Glen Boulevard
- 5 Irving Schachter Park  
2599 Beverwil Drive
- 6 Westwood Park and Recreation Center  
1350 South Sepulveda Boulevard
- 7 Palms Park  
2950 Overland Avenue
- 8 Robertson Recreation Center  
1641 Preuss Road

**City of Beverly Hills**

- 9 Beverly Gardens Park  
Along Santa Monica and Wilshire Boulevards
- 10 Roxbury Park  
471 South Roxbury Drive
- 11 Maltz Park  
9800 Sunset Boulevard
- 12 Will Rogers Memorial Park  
9650 Sunset Boulevard

**PROJECT SITE**



Source: PCR Services Corporation, 2007.

Figure 57  
Parks and Recreational Facilities  
Located in the Vicinity of the Project Site

jurisdiction to require a subdivision to provide a maximum of three acres per 1,000 persons in land dedication or fees, unless that particular jurisdiction is already exceeding that ratio.

As discussed in Section 3.c. above, the proposed project would essentially provide its residents with a “neighborhood park” that is customized to the type of residential development proposed. This recreational use would serve residents of all ages within the residential tower and would include outdoor recreation space totaling approximately 46,000 square feet (1.05 acres). Given that the neighborhood park would be private (i.e., for use by the residents of the tower only), and long-term maintenance would be the responsibility of the Home Owner’s Association, residents within the “immediate neighborhood” would only consist of the residents within the residential tower. Based on the estimated number of residents generated by the project (553 residents), the project would require 1.11 acres (0.002 acre per person) of neighborhood parkland to meet the PRP’s long-range standard and 0.55 acre (0.001 acre per person) to meet the PRP’s more attainable short- and intermediate-range standard. The project proposes to include 1.05 acres of open space and recreational opportunities thus exceeding the City’s short- and intermediate-range standards for neighborhood parks by 0.5 acres and falling just 0.06 acres short of the City’s long-range standards for neighborhood parks. As previously stated, the PRP notes that the long-range standards may not be reached during the life of the plan, and, therefore, the short- and intermediate-range standards should be consulted for guidance.

In addition, implementation of the mitigation measures below would ensure that through the provision of on-site recreational amenities and open space areas, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the parks and recreational requirements set forth by State law.

## **(2) City of Los Angeles Municipal Code**

Pursuant to Section 12.21 of the LAMC, the proposed project would be required to provide a minimum of 175 square feet of usable open space area per dwelling unit.<sup>5</sup> This amounts to 45,850 square feet of usable open space area based on the number of units proposed. Of this amount, at least 22,925 square feet (50 percent) must be common open space area. Of the 22,925 square feet of common open space area, a minimum of 5,731 square feet (25 percent) must be planted with ground cover, shrubs, or trees. As discussed in Section 3.c. above, the project would provide 46,000 square feet of common open space area via a rooftop terrace, of which 30,300 square feet would be planted area. Therefore, the proposed project would exceed the required 45,850 square feet of usable open space area by 150 square feet, the required 22,925 square feet of common open space area by 23,075 square feet, and the required 25 percent square feet of planted common area by 24,569 square feet. Because indoor

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<sup>5</sup> *To present a conservative analysis, each of the units is assumed to have more than three habitable rooms.*

recreational amenities potentially provided by the proposed project were not taken into account when evaluating compliance with the usable open space area requirement, they do not violate the 25 percent maximum allowed as counting towards this requirement. As demonstrated above, the proposed project would comply with the open space requirements set forth in LAMC Section 12.21.

Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum residential density permitted within the zone where it is located. The project site is located within a C2 zone, which allows residential development pursuant to the standards established for the R4 zone. The R4 zone permits up to one dwelling unit per 400 square feet of lot area; therefore the site is permitted to be developed to a maximum density of over 100 dwelling units per acre. Thus, based on the provisions set forth in LAMC Section 17.12, 32 percent of the gross subdivision area would be required to be dedicated to the City of Los Angeles for park or recreational purposes. In the case of the proposed project, this would equate to a land dedication of 0.77 acre (32 percent of 2.41 acres). As discussed in Section 3.c. above, the project proposes to include 46,000 square feet of common open space (1.05 acres) on its exterior terrace. While the proposed project would exceed the land area requirements of Section 17.12 of the LAMC by approximately 0.28 acres, this area would not be dedicated to the City of Los Angeles. Thus, potentially significant impacts could occur. However, implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas as a credit against the dedication of open space, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the maximum requirements established under the Quimby Act. With this mitigation measure, impacts on parks and recreational facilities would be less than significant.

#### **4. CUMULATIVE IMPACTS**

Section III of this EIR identifies 108 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on parks and recreation, only those related projects located within the City of Los Angeles and that propose residential uses are considered. Of the 108 related projects identified in Section III, 35 are included in this cumulative analysis as listed in Table 53 on page 544. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional parks and recreation facilities. Similar to the proposed project, the residential population was determined by multiplying the number of residential units by the 2005 average household size as indicated by the population data obtained for the West Los Angeles Community Plan for projects located within the Community Plan Area. For projects located outside the Community Plan



**Table 53****Related Residential Projects Within the City of Los Angeles**

<b>Map No.<sup>a</sup></b>	<b>Project</b>	<b>Location</b>	<b>Residential Population<sup>b</sup></b>
1	UCLA Westwood Campus Expansion	UCLA Westwood Campus	2,000 <sup>c</sup>
3	Palazzo Westwood Retail, High-Turnover Restaurant	1001 Tiverton Ave.	539
6	Apartments, Specialty Retail	10852 Lindbrook Ave.	32
7	Apartments	860 S. Devon Ave.	27
8	Condominiums	10804 Wilshire Blvd.	154
9	Condominiums	10776 Wilshire Blvd.	221
14	Wilshire/Comstock Condominium Project	10250 W. Wilshire Blvd.	62
16	St. Regis Redevelopment Project	2055 Ave. of the Stars	310
17	Condominiums	527 S. Midvale St.	256
18	Residential Hotel	10844 W. Lindbrook Dr.	71
20	Condominiums	1826 S. Glendon Ave.	34
21	Condominiums	1417 S. Butler Ave.	34
23	Condominiums	1625 S. Barry Ave.	38
24	Condominiums	1525 S. Armacost Ave.	38
25	Condominiums	1633 S. Armacost Ave.	34
26	Condominiums	10763 W. Wilshire Blvd.	127
27	Condominiums	2037 S. Beverly Glen Blvd.	34
29	Condominiums	1511 S. Camden Ave.	34
30	Condominiums, Office, Specialty Retail	11663 Wilshire Blvd.	52
32	Condominiums	10617 W. Eastborne Ave.	30
33	Condominiums	1517 S. Bentley Ave.	46
34	Apartment	1817 S. Beloit Ave.	32
35	Live/Work Units	11500 W. Tennessee Ave.	177
36	Condominiums	430 S. Kelton Ave.	97
38	Condominiums	1807 S. Beverly Glen Blvd.	34
39	Condominiums	2263 S. Fox Hills Dr.	32
44	Condominiums	10131 Constellation Blvd.	1,019
46	Condominiums	1333 S. Beverly Green Dr.	11
47	Belmont Village	Wilshire Blvd./Warner St.	259
48	Apartments	10000 W. Santa Monica Blvd.	739

Table 53 (Continued)

## Related Residential Projects Within the City of Los Angeles

Map No. <sup>a</sup>	Project	Location	Residential Population <sup>b</sup>
49	Apartment, Retail	10901 Santa Monica Blvd.	76
50	Condominiums, Office, Retail	10604-10612 National Blvd.	61
53	Del Capri Hotel	Wilshire Blvd/Westholme Ave.	148
54	Condominiums	11611 Montana Ave.	34
63	Condominiums	10710 Wilshire Blvd.	119
<b>Related Projects Total</b>			<b>7,009</b>
<b>Proposed Project Total</b>			<b>553</b>
<b>Grand Total</b>			<b>7,562</b>

<sup>a</sup> Corresponds with Map Nos. on Figure 15 on page 153 in Section III of this EIR.

<sup>b</sup> The residential population was determined by multiplying the number of residential units by the 2005 average household size as indicated by the population data obtained for the West Los Angeles Community Plan for projects located within the Community Plan. For projects located outside the Community Plan area, the average household size as indicated by the population data obtained for the associated census tract was used.

<sup>c</sup> Based on the number of beds rather than population data (1 bed = 1 person).

Source: PCR Services Corporation, 2007.

Area, the average household size as indicated by the population data obtained for the corresponding census tract was used. As shown in Table 53, related projects could potentially generate 7,009 residents. The proposed project in conjunction with related projects could therefore generate 7,562 residents. However, all related projects with residential uses would be required to comply with the requirements of the Quimby Act, the PRP, and LAMC Sections 12.21 and 17.12. As such, potential cumulative impacts to parks and recreational facilities would be reduced to a less than significant level.

## 5. MITIGATION MEASURES

**Mitigation Measure I.5-1:** The Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

**6. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Potential significant impacts to park and recreational facilities associated with the proposed project would be reduced to a level that is less than significant via compliance with Mitigation Measure I.5-1.