

J. PUBLIC SERVICES

The purpose of this section is to assess the impacts of the proposed project and Add Area on fire protection, police services, schools, parks, and libraries. This section is based on comparisons of projected service needs to the existing or anticipated levels of service.

For each of the public services included in this section, facilities serving the project site and levels of service are described, as well as any improvements required to accommodate the project demand for additional public services. This section discusses current levels of service or capacity, as appropriate, and assesses the quantities of services necessary for construction and operation of the project. Services for the proposed project are assessed in terms of location, existing and projected service ratios, response times, and other service objectives as applicable. Cumulative impacts are determined with consideration of projected development in the study area.

1. FIRE PROTECTION

EXISTING CONDITIONS

The City of Los Angeles Fire Department (LAFD) would provide emergency medical service (EMS) and fire protection service for the proposed project and for the anticipated development of the Add Area. Five LAFD stations are located in close proximity to the project site and Add Area. Specifically, Fire Stations 102, 39, 89, 60, and 78, are located closest to the project site and would provide emergency and fire services.

Fire Station 102 is located at 13200 Burbank Boulevard in Van Nuys approximately 1.1 miles south of the project site. Fire Station 102 is staffed with 10 persons and includes a Task Force Truck and Engine Company.¹ The station mostly serves the communities of south Van Nuys, Sherman Oaks, and Valley Glen.

Fire Station 39 is located at 14415 Sylvan Street west of the site approximately 1.7 miles west of the project site. Fire Station 39 is staffed with 17 persons and includes a Hazardous Materials Squad and Paramedic Rescue Ambulance in addition to being Battalion 10 Headquarters.² Fire Station 39 mostly serves the Van Nuys community.

Fire Station 89 is located at 7063 Laurel Canyon Boulevard, approximately 2.2 miles northeast of the project site. Fire Station 89 is staffed with 12 persons at all times and includes a Task Force Truck and Engine Company and Paramedic Rescue Ambulance. Fire Station 89 primarily serves the North Hollywood community.

Fire Station 60 is located at 5320 Tujunga Avenue, approximately 3.1 miles southeast of the project site. Fire Station 60 is staffed with 15 persons at all times and includes a Paramedic Engine Company, Task Force Truck and Engine Company, EMT Rescue Ambulance, and is Battalion 14 Headquarters. Similar to Fire Station 89, Fire Station 60 primarily serves the community of North Hollywood.

¹ Letter from C.A. Fry, Assistant Fire Marshall, Los Angeles Fire Department, April 24, 2008.

² Ibid.

Fire Station 78 is located at 4230 Coldwater Canyon Boulevard, approximately 3.0 miles south of the project site. Fire Station 78 is staffed with 4 persons at all times and includes a Paramedic Engine Company. Fire Station 78 primarily serves the communities of Studio City, Coldwater Canyon and Sherman Oaks. **Table IV.J-1** shows the fire stations located closest to the project site.

TABLE IV.J-1 FIRE STATIONS THAT SERVE THE PROJECT SITE		
Fire Station	Location	Staffing and Equipment
102	13200 Burbank Boulevard	10 persons and includes a Task Force Truck and Engine Company
39	14415 Sylvan Street	17 persons and includes a Hazardous Materials Squad and Paramedic Rescue Ambulance in addition to being Battalion 10 Headquarters
89	7063 Laurel Canyon Boulevard	12 persons, Task Force Truck and Engine Company and Paramedic Rescue Ambulance
60	5320 Tujunga Avenue	15 persons, Paramedic Engine Company, Task Force Truck and Engine Company, EMT Rescue Ambulance, and is Battalion 14 Headquarters
78	4230 Coldwater Canyon Boulevard	4 persons and a Paramedic Engine Company
Source: Sirius Environmental, 2008, Letter from LAFD April 24, 2008.		

ENVIRONMENTAL IMPACTS

THRESHOLD OF SIGNIFICANCE

The proposed project would have a significant adverse impact on public services if it:

- if it results in substantial adverse physical impacts associated with fire protection facilities or a need for new or physically altered fire protection facilities in order to maintain acceptable service ratios or response times, or other performance objectives.

PROJECT IMPACTS

Proposed Project

The project site currently is occupied by a shopping center and associated surface parking. The LAFD already provides fire protection and emergency services for the project site. The proposed project would remove the existing shopping center and develop a mixed-use project totaling 1.3 million net square feet. Specifically, the project would provide 150 multi-family residential units, a 230-room hotel, approximately 550,000 square feet of office space, a 2,700 seat theater complex, a 45,000 square foot gym and 285,000 square feet of shopping center. The additional residents employees and patrons would increase demand for fire protection and emergency services.

According to the Los Angeles Fire Department, the adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations and the Department's judgment for needs in the area.³

Development Resource Consultants prepared a Fire Flow analysis for the project site. The purpose of the analysis was to determine whether the proposed public water system could deliver required fire flows to the on-site public fire hydrants. According to the Fire Flow analysis, the required flow from the on-site hydrants was determined by the Los Angeles Fire Department (LAFD). A minimum residual water pressure of 20 psi would remain in the water system, with the required gallons per minute (GPM) flowing. The required fire flow for this project has been set at 4,000 GPM from four (4) fire hydrants flowing simultaneously.

Two scenarios were run for the fire flow analysis. Both fire flow scenarios for the proposed project achieved a residual pressure greater than 20 psi under the fire flow demand. Therefore, the Fire Flow Report concluded that the water system delivers adequate fire flow under the required demand.⁴ Mitigation measures provided below would ensure that safety measure would be in place during the construction and operational phases of the proposed project. Therefore, impacts to fire services would be considered less than significant with mitigation incorporation.

Add Area

As detailed in Section II Project Description, the Add Area is currently occupied with an 18,414 square foot self-storage facility, the St. Jane Frances de Chantal Catholic Church and K-6 Parish School. The Summit View private school is also located on the Area. The site is occupied by a small community shopping center that includes a 4,792 square foot McDonald's fast-food restaurant and 5,766 square feet of miscellaneous retail uses.

Under anticipated development of the Add Area, approximately 182 residential units would be constructed in addition to 37,000 square feet of retail and 168,000 square feet of office space. As stated in the Project Description, the Church and associated school would remain under anticipated development of the Add Area. All other existing uses would be removed prior to anticipated development. The anticipated residential units could result in an increased demand for fire protection services. This would result in a less than significant impact with mitigation incorporation. Similar to the proposed project, mitigation measures provided below would ensure that safety measures would be in place during construction and operational phases. Additionally, mitigation including the preparation of a Fire Flow analysis is described below.

MITIGATION MEASURES

- IV.J-1 Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit.
- IV.J-2 The applicant shall consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.

³ Letter from C.A. Fry, Assistant Fire Marshall, Los Angeles Fire Department, April 24, 2008.

⁴ Development Resources Consultants, *Plaza at the Glen- Fire Flow Analysis Report*, 2008.

- IV.J-3 Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of the project.
- IV.J-4 Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
- IV.J-5 Plot plans indicating access driveways and roads and turning areas shall be reviewed and approved by the Fire Department, prior to the issuance of a building permit.
- IV.J-6 During the construction phase, emergency access shall remain clear and unobstructed.
- IV.J-7 The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines 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 C.P.C. 19708).
- IV.J-8 All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.
- IV.J-9 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.
- IV.J-10 A Fire Flow analysis shall be prepared for the Add Area. The purpose of the analysis will be to determine whether the proposed public water system could deliver required fire flows to the public fire hydrants located in the Add Area.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measures IV.J-1 through IV.J-10 would minimize potential impacts to fire services to a less than significant levels for the project site and Add Area.

CUMULATIVE IMPACTS

This analysis is based on the projects identified in **Table III-3, Related Projects**. The related projects include various commercial/mixed-use, office, and residential projects located in the vicinity of the project that are currently under construction, approved but not built, or proposed for development.

The proposed project, in conjunction with the related projects, would increase the residential and employment population in the area. The increased population could increase demand for fire protection services. Implementation of Mitigation Measures IV.J-1 through IV.J-10 would reduce both the proposed project's and Add Area's impacts to fire protection services to less than significant levels. Similar to the proposed project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD. As such, the proposed project and anticipated development

of the Add Area are not anticipated to contribute to significant cumulative impacts associated with fire and police protection services.

2. POLICE PROTECTION

EXISTING CONDITIONS

The Los Angeles Police Department (LAPD) provides police services for the City of Los Angeles. The proposed project and the Add Area are located in the North Hollywood Area and are serviced by the North Hollywood Community Police Station. The North Hollywood Station is one of seven stations under the jurisdiction of the Valley Bureau. The North Hollywood Community Police Station is located at 11640 Burbank Boulevard, approximately 2.3 miles southeast of the project site. The communities included in the service boundaries for the North Hollywood Station span approximately 25 square miles and include the following: North Hollywood, Studio City, Valley Village, Toluca Lake, West Toluca Lake, and a portion of Sun Valley.

According to the LAPD, the average response time to emergency calls in the North Hollywood area during 2008 was six minutes, which is similar to the Citywide average response time in during that time.⁵ According to the LAPD, the number of sworn police officers at the North Hollywood Community Station is 256, with the number of civilian support personnel at 23.⁶ The North Hollywood Station also includes 29 reserve officers and 63 citizen volunteers. Based on the approximate population of the North Hollywood Area of 246,000 persons, there is one sworn police officer for every 960 persons.

The North Hollywood Police Station also maintains five substations throughout the area. Substations are considered “drop-in” offices and were established to better serve the public by providing easier access to a community police station. The substations are typically open a few days of the week for limited hours. A few of the substations are located in close proximity to the project site. The Valley Storefront Substation is located at 12821 Victory Boulevard, approximately 0.2 miles west of the project site. Another substation, the Valley Plaza Park Recreation Center Substation is located at 12440 Archwood Street, approximately 1.1 miles northeast of the site. Currently, the substations are not operational due to lack of staffing.⁷

According to the LAPD, the North Hollywood Community Station is operating at more than full capacity and there are no immediate plans to construct a new station or expand the existing one.⁸

ENVIRONMENTAL IMPACTS

THRESHOLD OF SIGNIFICANCE

The proposed project would have a significant adverse impact on public services if it:

⁵ *Email communication*, Sergeant David Delgado, LAPD North Hollywood Station, September 23, 2008.

⁶ www.lapdonline.org. Accessed August 25, 2008.

⁷ Sergeant David Delgado, LAPD North Hollywood Station. (818) 755-7679 *Phone communication*. September 24, 2008.

⁸ *Ibid*.

- results in substantial adverse physical impacts associated with police protection facilities or a need for new or physically altered police protection facilities in order to maintain acceptable service ratios or response times, or other performance objectives;

PROJECT IMPACTS

Proposed Project

The housing component of the proposed project could potentially generate a worst-case scenario of 323 residents and 2,885 employees.⁹ These persons, along with the mixed-use uses that are proposed, could increase the demand for police services.

The LAPD was contacted about police services currently provided to the site and any anticipated changes that would be required to serve the proposed project. According to the LAPD, existing LAPD services would not be considered adequate to serve the proposed project.¹⁰ As stated earlier, in its current condition, the North Hollywood Station is considered to be operating at more than full capacity. The additional residential population resulting from the proposed project would increase the ratio of residents to police officers by one person (from one officer for every 961 persons to one officer for every 962 persons). Therefore, while it is possible that the additional residential population would increase the need for police protection services, the ratio of officers to residents would not be significantly impacted by the proposed project.

As stated in II Project Description, the proposed project would develop the site with a 1,300,000 net (or rentable) square foot (up to 1,500,000 gross square feet) urban community. The project would provide 150 multi-family residential units, a 230 room hotel, approximately 550,000 net square feet of office space (of which 100,000 net square feet would be medical office), a 2,700 seat theater complex, a 45,000 square foot gym and 285,000 net square feet of shopping center broken down as follows: 140,000 net square feet of retail, 100,000 net square feet of restaurant, and a 45,000 net square foot market. These uses could increase the demand for police services.

The LAPD suggest that in order to help minimize police protection service calls, the proposed project should incorporate security features for the proposed project during the construction phase. Additionally, the LAPD encourages the developer to provide the North Hollywood Community Station with diagrams for every portion of the property that indicate access routes, and any additional information that would facilitate police response. Consultation with LAPD in addition to implementation of mitigation measures provided below would address potential increases in the demand for police services. Therefore, impacts to police services would be considered less than significant with mitigation incorporation.

⁹ Kosmont Companies, *Estimate of Permanent Jobs and Residents-Plaza at the Glen Project*, 2008. Calculation based on: 333 sf per retail/market employee, 300 sf per office employee, 2,500 sf per hotel employee, 500 sf per gym employee, 1500 sf per theater employee. For residents: 1.75 persons per 2 bedroom unit, 3 persons per 3 bedroom unit.

¹⁰ *Email communication*, Sergeant Delgado, LAPD North Hollywood Station, September 23, 2008.

Add Area

As stated in Section II Project Description, under anticipated development of the Add Area, approximately 182 residential units would be constructed in addition to 37,000 square feet of retail and 168,000 square feet of office space. The existing church and associated school would remain under anticipated development of the Add Area. All other existing uses would be removed prior to anticipated development. The anticipated residential units could result in an increased demand for police services. This would result in a less than significant impact with mitigation incorporation. Similar to the proposed project, mitigation measures provided below would ensure that safety measures would be in place during construction and operational phases.

MITIGATION MEASURES

- IV.J-11 During the project's construction phase, the applicant shall ensure adequate through access and emergency access to adjacent uses.
- IV.J-12 The applicant shall consult with the Police Department and comply with recommended security features for the construction site(s), including security fencing, locked entrances, lighting, and the use of a seven-day, 24-hour security patrol.
- IV.J-13 Upon completion of the project, the applicant shall provide the North Hollywood Division Commanding Officer with access routes and other information that might facilitate police response, as requested by the LAPD.
- IV.J-14 The applicant shall provide project plans to the LAPD Crime Prevention Unit to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.
- IV.J-15 The project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measures IV.J-11 through IV.J-15 would minimize potential impacts to police services to a less than significant level.

CUMULATIVE IMPACTS

This analysis is based on the projects identified in **Table III-3, Related Projects**. The related projects include various commercial/mixed-use, office, and residential projects located in the vicinity of the project that are currently under construction, approved but not built, or proposed for development.

The proposed project, in conjunction with the related projects, would increase the residential and employment population in the area. The increased population could increase demand for police protection services. Implementation of Mitigation Measures IV.J-11 through IV.J-15 would reduce the proposed project's impacts to police protection services to less than significant levels. Similar to the proposed project, each of the related projects would be individually subject to LAPD review in order to adequately address police protection service demands. As such, the proposed project is not anticipated to contribute to significant cumulative impacts associated with fire and police protection services.

3. SCHOOLS

EXISTING CONDITIONS

The Los Angeles Unified School District (LAUSD) administers the public school system of the City of Los Angeles and some neighboring communities. The Los Angeles Unified School District (LAUSD) administers the public school system of the City of Los Angeles and some neighboring communities. The LAUSD serves over 730,000 students and administers over 875 schools.¹¹ Over the next five years, LAUSD plans to build 80 new schools, and that number is expected to grow to 120 over the next 10 years.¹²

The schools that would serve the proposed project and the Add Area are Coldwater Canyon Elementary School, Madison Middle School, and Grant Senior High School. All three schools were operating below capacity during the 2007-08 school year. A summary of the enrollment capacities and school capacities for the three schools are provided in **Table IV.J-2**.

TABLE IV.J-2 LAUSD SCHOOLS THAT SERVE THE PROJECT SITE				
School	Location	School Capacity	2007-2008 Enrollment	Over-crowded?
Coldwater Canyon Elementary School	6850 Coldwater Canyon Avenue	1,162	1,008	No
Madison Middle School	13000 Hart Street	2,400	1,877	No
Grant Senior High School	13000 Oxnard Street	3,590	2,343	No
Source: Telephone and Email Communication Robert Nordarse, Administrative Research, LAUSD Master Planning and Demographics. September 9, 2008.				

ENVIRONMENTAL IMPACTS

THRESHOLD OF SIGNIFICANCE

The proposed project would have a significant adverse impact on public services if it:

¹¹ <http://www.teachinla.com/whyteach/about.html>. Accessed September 25, 2008.

¹² Ibid.

- results in substantial adverse physical impacts associated with public schools or need for new or physically altered public schools in order to maintain acceptable service ratios, or other performance objectives;

PROJECT IMPACTS

Project Impacts

The proposed project includes 150 new housing units, of which 102 would be two-bedroom rental units and 48, which would be three-bedroom condominium units for sale. The City of Los Angeles CEQA Thresholds Guide provides generation factors of 0.25 student/unit for elementary, .10 student/unit for middle school and 0.14 student /unit for high school students for two-bedroom apartments. It provides generation factors of 0.05 student/unit for elementary, 0.02 student/unit for middle school and 0.027 student/unit for three-bedroom condominiums. Therefore, based on student generation factors for the City of Los Angeles, the proposed project is estimated to increase the current student population by approximately 44 new students. **Table IV.J-3** shows the breakdown of new students generated by the proposed project.

TABLE IV.J-3 STUDENT GENERATION BY THE PROPOSED PROJECT		
School Level	Students Generated (2 Bedroom Rental Apt)	Students Generated (3 Bedroom Condo Sale)
Elementary School	26 ¹	2 ⁴
Middle School	10 ²	1 ⁵
High School	14 ³	1 ⁶
Students Generated by Proposed Project	40	4
Total Students	44	
¹ Elementary school student generation factor: Rental units, two-bedroom: 0.25 student/unit.		
² Middle school student generation factor: Rental units, two-bedroom: 0.10 student/unit.		
³ High school student generation factor: Rental units, two-bedroom: 0.14 student/unit.		
⁴ Elementary school student generation factor: Condo three-bedroom: 0.05 student/unit.		
⁵ Middle school student generation factor: Condo three-bedroom: 0.02 student/unit.		
⁶ High school student generation factor: Condo three-bedroom: 0.027 student/unit.		
Source: Sirius Environmental 2008; City of Los Angeles Planning Department, <i>City of Los Angeles Draft CEQA Guide</i> , June 2006.		

As addressed in the Setting discussion, there are three schools that would serve the proposed project are Coldwater Canyon Elementary, Madison Middle School, and Grant Senior High School. These schools are not at capacity enrollment (based on 2007-2008 enrollment levels), as previously shown in **Table IV.J-2**.

The additional students generated by the proposed project would not adversely impact school capacities at the three schools. In order to reduce potential impacts on overcrowding of schools District-wide, the LAUSD requires payment of mitigation fees for residential and commercial

development. Payment of these fees (Mitigation Measure IV.J-2) is considered mitigation of any potential impacts on public school services.

Add Area

As stated in II. Project Description, under anticipated development of the Add Area, approximately 182 residential units would be constructed. Assuming that the residential units would consist of two-bedroom rental units, approximately 89 additional students would be generated under anticipated development of the Add Area. **Table IV.J-4** shows the breakdown of new students generated by the proposed project.

TABLE IV.J-4 STUDENT GENERATION BY THE ANTICIPATED DEVELOPMENT OF THE ADD AREA	
School Level	Students Generated (2 Bedroom Rental Apt)
Elementary School	46 ¹
Middle School	18 ²
High School	25 ³
Total Students	89
¹ Elementary school student generation factor: Rental units, two-bedroom: 0.25 student/unit. ² Middle school student generation factor: Rental units, two-bedroom: 0.10 student/unit. ³ High school student generation factor: Rental units, two-bedroom: 0.14 student/unit.	
Source: Sirius Environmental 2008; City of Los Angeles Planning Department, <i>City of Los Angeles Draft CEQA Guide</i> , June 2006.	

Similar to the proposed project, the additional students generated by the anticipated development of the Add Area would not adversely impact school capacities at the three schools. In order to reduce potential impacts on overcrowding of schools District-wide, the LAUSD requires payment of mitigation fees for residential and commercial development. Payment of these fees (Mitigation Measure IV.J-16) is considered mitigation of any potential impacts on public school services.

MITIGATION MEASURES

IV.J-16 Applicant of the proposed project would be expected to pay required developer school fees to LAUSD pursuant to Government Code Section 65995, as amended by Senate Bill 50, to help reduce any impacts on school services.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measure IV.J-16 would reduce impacts to public schools to less than significant levels for both the proposed project and the Add Area.

CUMULATIVE IMPACTS

This analysis is based on the projects identified in **Table III-3, Related Projects**. The related projects include various commercial/mixed-use, office, and residential projects located in the vicinity of the project that are currently under construction, approved but not built, or proposed for development.

Several of the related projects would include residential developments that could include generate school-age children and could have a potential impact on school capacity. Upon payment of mitigation fees as described in Mitigation Measure IV.J-16, the proposed project would have less than significant impacts on public school services. Therefore, the proposed project is not anticipated to contribute to significant cumulative impacts on public school services.

4. PARKS

EXISTING CONDITIONS

The City of Los Angeles has approximately 15,600 acres of parkland that are administered by the City's Department of Recreation and Parks. According to the City of Los Angeles Public Recreation Plan, parks can be classified into three groups: neighborhood, community, and regional. A neighborhood park should be a minimum of five acres in size (ideally 10 acres) with a service radius of one-half mile. Vest Pocket Parks, which are less than five acres, are also considered neighborhood parks. A community park should be a minimum of 15 acres in size (ideally 20 acres), with a service radius of two miles. Regional parks are generally over 50 acres in size and serve the entire city region. The City of Los Angeles, in comparison with other large metropolitan areas in the United States, has less parkland per number of residents.

There are two City of Los Angeles neighborhood and community parks located in the applicable service radius surrounding the site. The Valley Glen Community Park located at Erwin Street and Ethel Avenue is located less than one mile south of the site. The Valley Plaza Neighborhood Park located at 12240 Archwood Street is approximately 1.32 miles east of the site. **Table IV.J-5** includes the parks that are located in close proximity to the project site. The location of parks in the project area shown in **Figure IV.J-2, Public Schools, Parks, and Libraries**.

Several other parks are located in proximity to the project site. The Valley Village Neighborhood Park, located near the 170 Freeway and Burbank Boulevard is located less than four miles southeast of the site. Additionally, Woodley Avenue Neighborhood Park is located approximately four miles west of the site at 6100 Woodley Avenue. In addition to the above-mentioned parks, the North Hollywood Senior Citizen Center is located approximately 3.40 miles southeast of the site at 11430 Chandler Boulevard. Also located southeast of the site is the North Hollywood Recreation Center, located at 5301 Tujunga Avenue.

Additionally as described in Section III Environmental Setting, the project site is bordered by the Tujunga Wash channel and Greenway on the west. The banks of the Wash in the vicinity of the site were recently restored as part of the Santa Monica Mountains Conservancy's *Tujunga Wash Greenway and Stream Restoration Project*. The Greenway area along the east side of the Tujunga Wash between the site parking lot and the concrete-lined channel contains a bicycle/pedestrian path and recently planted vegetation.

TABLE IV.J-5 CITY OF LOS ANGELES PARKS THAT SERVE THE PROJECT SITE				
Park	Location	Distance from Site	Area	Facilities
Valley Glen Community Park	Erwin St./Ethel Ave.	0.3 mile	5.84 acres	Baseball diamond, picnic tables
Valley Plaza Neighborhood Park	12240 Archwood St.	1.6 miles	66.36 acres	Community room, baseball and football fields, basketball courts, indoor/outdoor gyms, pool.
Source: Sirius Environmental, 2008.				

REGULATORY FRAMEWORK

Quimby Act

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. Under the Quimby Act, requirements for dedications of land are not to exceed five 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. If the parkland standard is not exceeded in a project area, cities may request a minimum exaction for the proposed project under the Quimby Act of three acres of parkland per 1,000 persons, and up to five acres per 1,000 if that city currently has five acres of parkland per thousand residences. The City of Los Angeles relies on four acres per 1,000 persons standard. The Quimby Act also 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. Thus, Los Angeles Municipal Code (LAMC) Section 17.12 was authorized pursuant to the Quimby Act. Compliance with the Quimby Act as set forth in Section 17.12 of the LAMC is discussed below.

City of Los Angeles General Plan

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.

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.¹³ 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 includes such facilities as a community building, multi-purpose fields, hard 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 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 plan, 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 for parks or recreational facilities is diminished due to population and/or land use changes.

City of Los Angeles Municipal Code (LAMC)

Section 12.21 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

¹³ City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.

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 common and/or private 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. Private open space may not have a dimension of less than six feet in any direction.

Section 17.12 of the LAMC, authorized under the Quimby Act, which requires developers to set aside land for park and recreational purposes, donate conservation elements, and/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 density permitted by the zone within which the site is located. As the proposed project is requesting a zone change to (T)(Q)C2-2, which allows residential development pursuant to the standards established for the R4 zone, it is permitted to be developed to a maximum density of over 100 dwelling units per acre. However, section 17.12 C of the LAMC provides an exception where an applicant proposes to develop land at less than the maximum density permitted for the zone,¹⁴ the Advisory Agency shall base the required dedication upon the proposed density. Thus, based on the proposed project density of 15.8 dwelling units per acre, approximately 0.74 acres (32,278 Sq. Ft.) would be required to be dedicated as parkland.

If a developer fails to meet the full dedication requirement, fees for park improvements may be paid to the Department of Recreation and Parks (DRP) in lieu of the dedication of all or a portion of the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the proposed zoning of the project. Currently, the fee for the C2 zone is set at \$4,772 per dwelling unit constructed.¹⁵

Section 17.12 of the LAMC allows 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 park and recreation facilities.

¹⁴ This exception is granted where the subdivider has executed and recorded in the office of the County Recorder a covenant running with the land, that such land shall not be developed in such a manner as to create higher density than that proposed in the project.

¹⁵ City of Los Angeles Department of City Planning, memo, February 6, 2009.

ENVIRONMENTAL IMPACTS

The analysis of parks and recreation impacts is based on comparing the project's provision of recreation and open space areas 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 1,000 project residents.

THRESHOLD OF SIGNIFICANCE

Based on the City of Los Angeles 2006 CEQA Thresholds Guide, the determination of significance for impacts to parks and recreation 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).

Based on these factors, the proposed project would have a significant impact on recreation and park services if the project generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or financial support.

PROJECT IMPACTS

Proposed Project

Project Design Features

The project would provide approximately 237,000 square feet (or 5.44 acres) of common open space for project employees, residents and visitors that would consist of plazas and landscaping spread over multiple levels. This does not include an additional 80,500 square feet of landscaping and transit circulation space in the transit plaza. A minimum of 25 percent of the common open space area would be landscaped with plantings such as ground cover, shrubs, and trees. Private open space for the project would include a two-story, 45,000 net square foot gym/health club that would be available to all project residents (membership would be automatic for project residents; it would be a full service club with indoor swimming pool, basketball courts, racquetball courts and other facilities), and balconies on about 50 units of approximately 50 square feet (about 2,500 square feet total).

Portions of the Tujunga Wash Greenway adjacent to the site may be enhanced as part of the project. In addition, approximately 45,500 square feet of Greenway (landscaping and bicycle/pedestrian path) would be covered by the transit plaza and landscaping. Of this, approximately 13,500 square feet is located between the Ethel Avenue bridge and Victory Boulevard and is inaccessible the public. While the transit plaza would cover a portion of the

Greenway in proximity to Victory Boulevard, it would provide facilities to support the Greenway (bicycle racks, ranger station and bathrooms), as well as providing a clear route across the project driveway (reconfigured Ethel Avenue), and clear and safe crossing of Victory Boulevard (compared to the current situation where the bicycle/pedestrian paths on either side of the wash terminate in the project parking lot – east side, and dead-end in to Ethel Avenue (west side). The transit plaza would also be landscaped to aesthetically integrate different modes of transportation (including pedestrian and bicycles and transit) at a community destination that would provide recreational and shopping opportunities for residents and employees in the area.

Project Impacts

Public Recreation Plan (PRP)

As discussed above, the PRP's desired long-range Citywide standard for local parks is two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks. However, 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 for neighborhood parks and one acre per 1,000 persons for community parks.¹⁶ Additionally, the State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of five acres per 1,000 persons in land dedication or fees, unless that particular jurisdiction is already exceeding that ratio.

Currently, Citywide park space is provided at an estimated rate of 0.70 acre per 1,000 residents.¹⁷ Therefore, the City meets neither the PRP's desired short- nor intermediate-range or long-range standards.

Based on the estimated 323 residents generated by the project, the project would require 1.29 acres (56,280 sq. ft.) of neighborhood parkland to meet the PRP's long-range standard and 0.64 acres (28,140 sq. ft.) to meet the PRP's short- and intermediate-range standard. The project would include 237,000 square feet of landscaped open space as well as a 45,000 square foot gym for project residents. While the on-site space would not be in a neighborhood park, it would serve to provide passive recreational outdoor space for project residents, as well as recreational/exercise facilities. Therefore, the project could be found to fulfill part of the City's long-range standard as well as the short-range and intermediate range standards for neighborhood parks.

With the project's common open space and recreational opportunities, the use of existing community parks in the area would also be minimized. Nevertheless, residents of the proposed development, particularly children, would be expected to utilize community parks (i.e., baseball, basketball, volleyball, and tennis courts, etc.) where these facilities are not included in the on-site recreation and open space amenities. The open space on the project site could be credited towards the City's long-range and short-range standards for community parks, though impacts relative to the PRP would be significant prior to mitigation. Implementation of the mitigation measure below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees, provision of on-site recreational

¹⁶ City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.

¹⁷ City of Los Angeles, Department of City Planning memo, February 6, 2009.

amenities and open space areas, or through a combination of these methods. Furthermore, implementation of the mitigation measure would ensure that the project would comply with the parks and recreational requirements set forth by the LAMC (discussed below).

City of Los Angeles Municipal Code (LAMC)

As previously discussed, Section 12.21 of the LAMC requires that all buildings containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the project would be required to provide a total of 16,000 square feet of usable open space, as shown in **Table IV.J-6**. The proposed project would provide approximately 237,000 square feet of usable open spaces areas consisting of common open space (landscaped terraces and courtyards); in addition 2,500 square feet of private open space (balconies) for its residents; and the 45,000 square foot gym would be available to project residents.

TABLE IV.J-6 SECTION 12.21 LAMC- OPEN SPACE REQUIRED AND PROVIDED BY THE PROJECT			
Open Space Requirement	Quantity	Requirement (SF/Unit)	Total Required
DU with <3 habitable rooms	102 DU	100 SF/DU	10,200 SF
DU with 3 habitable rooms	48 DU	125 SF/DU	6,000 SF
TOTAL			16,200 SF
Open Space Proposed	Quantity	Size	Total Provided
COMMON OPEN SPACE			
Plazas and landscaped terraces (exclusive of internal roadways, pedestrian/trolley circulation)	Throughout the project.	237,000 SF	237,000 SF
COMMON OPEN SPACE SUBTOTAL		237,000 SF	237,000SF
GYM/HEALTHCLUB	1	45,000 SF	45,000 SF
PRIVATE OPEN SPACE	50 DU	50 SF/DU	2,500 SF
PRIVATE OPEN SPACE SUBTOTAL			47,200 SF
TOTAL			284,200 SF
Source: Sirius Environmental, 2009.			

Thus, the proposed project would exceed the Section 12.21 requirement for the provision of usable open space. According to Section 12.21 of the LAMC, common open space must constitute at least 50 percent of the total required usable open space requirement. The project would also exceed this requirement. Additionally, per Section 12.21, a minimum of approximately 25 percent of the common open space must be planted with ground cover, shrubs, and trees. This requirement would be fulfilled under the proposed project.

As previously stated, 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 parkland dedication and/or the payment of in-lieu fees. For the project's proposed density of 15.8 dwelling units per acre, approximately 7.8 percent of the gross subdivision area would be required to be dedicated as parkland. Based on this formula and the gross lot area of 9.5 acres (the project site is currently divided into two lots, with the residential portion of the project proposed to be developed on the larger lot), the project would be required to do one of the following: dedicate approximately 0.74 acres (32,278 sq. ft.) of park and recreation space, or pay in-lieu fees of \$4,772 per dwelling unit.¹⁸ Of the approximately 237,000 sq. ft. of usable open space, all of it would be available as common area and passive recreation space, which could be credited toward the 0.74 acres (32,278 Sq. Ft.) parkland dedication requirements of Section 17.12. It will be up to the Department of Recreation and Parks and the Advisory Agency to determine the acceptability of project open space to meet these requirements. The project would likely increase demand for existing community parks, particularly recreation facilities oriented toward children and impacts relative to the PRP could be significant prior to mitigation. Implementation of Mitigation Measure IV.J-17 below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees, provision of on-site recreational amenities and open space areas, or through a combination of these methods. Therefore, impacts relative to compliance with Section 17.12, the implementing ordinance of the Quimby Act, would be less than significant assuming that project open space is found acceptable to meet requirements and/or the applicant pays the in-lieu fee found appropriate by the Department of Recreation and Parks and the Advisory Agency.

As stated in Environmental Setting, most communities of Los Angeles, in comparison with other large metropolitan areas in the United States, have less parkland per number of residents. The additional 323 residents anticipated under the proposed project would result in additional demand for parkland. While the proposed project would not include the addition of any parkland, it would include plazas and terraces for passive recreational activities and other recreational amenities and facilities, including a two-story, 45,000 net square foot gym/health club. The gym would be a full service club with indoor swimming pool, basketball courts, racquetball courts and other facilities. The recreational amenities would be oriented towards project occupants. However since the gym/health club would only be available to community members and other visitors that pay membership fees, it would not be considered to contribute to the project's parkland dedication. No recreational facilities specifically oriented towards children are proposed. However, the adjacent bicycle path along the Tujunga Wash, as well as the swimming pool in the fitness club may be attractive to children.

In conclusion, the project would meet the requirements set forth in Section 12.21 of the LAMC, and could be found to meet the parkland dedication requirements of Section 17.12 of the LAMC. However as stated above, the project would likely increase demand for existing community parks, particularly recreation facilities oriented toward children and impacts relative to the PRP could be significant prior to mitigation. Implementation of Mitigation Measure IV.J-17 below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees, provision of on-site recreational amenities and open space areas, or through a combination of these methods. Furthermore, implementation of the Mitigation Measure IV.J-17 would ensure that the project would comply with the parks and recreational requirements set forth by the LAMC.

¹⁸ Based on the revised fees in accordance with Section 12.12H of the LAMC, effective March 1st, 2009, and the fee requirement for per acre density permitted in the R4 zone.

Add Area

As stated earlier, anticipated development of the Add Area would include the development of approximately 182 residential units, thereby increasing residents in the area. Similar to the proposed project, this would increase the demand for parkland. Anticipated development would not include the addition of any parkland. Similar to the proposed project, Mitigation Measure IV.J-17 is included for the anticipated development of the Add Area and would reduce any potential impacts on parks and recreation services to less than significant levels.

MITIGATION MEASURES

IV.J-17 The applicant shall be required to comply with one or more of the following: 1) dedicate two acres of neighborhood parkland and two acres of community parkland per 1,000 residents, 2) pay in-lieu fees for any land dedication requirement shortfall, or 3) provide on-site improvements equivalent in value of the in-lieu fees, or any portion thereof.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measure IV.J-17 would reduce potential impacts to parks and recreation areas to a less than significant level.

CUMULATIVE IMPACTS

This analysis is based on the projects identified in **Table III-3, Related Projects**. The related projects include various commercial/mixed-use, office, and residential projects located in the vicinity of the project that are currently under construction, approved but not built, or proposed for development.

Several of the related projects would include residential developments that would increase the residential population of the area and could potentially increase demand on parks and recreational facilities. The proposed project would include some recreational amenities for its residential population. Additionally, the applicant of the proposed project would be required to comply with in-lieu fees as described in Mitigation Measure IV.J-17. Impacts associated with cumulative growth could also be reduced through the inclusion of similar recreational amenities and Quimby fees for the related projects. The proposed project would have a less than significant impact on parks and recreational facilities, and as such, would not contribute to significant cumulative impacts on parks and recreational facilities.

5. LIBRARIES

EXISTING CONDITIONS

The Los Angeles Public Library (LAPL) manages the library system of the City of Los Angeles. The system includes the Central Library, located in Downtown Los Angeles, and 72 branch libraries located throughout the City.¹⁹ The LAPL offers a multitude of programs for residents of all ages including films, children's programs, reading clubs, book discussions and reviews, and Internet classes. The library system maintains a collection of over six million books, periodicals,

¹⁹ Los Angeles Public Library, 2008, <http://www.lapl.org>, accessed online September 1, 2008.

government documents, and audio-visual materials. LAPL branches typically have a service radius of two-miles, with the exception of the main library that serves a much larger area.

The Valley Plaza Library located at 12311 Van Owen Street (1.4 miles northeast of the site and Add Area) and the Van Nuys Library, located at 6250 Sylmar Avenue (1.9 miles west of the site) would serve the proposed project. Both libraries are open six days a week and provide parking lots for library users. The Van Nuys Library was completely renovated in 1996 and was converted into a “virtual electronic” library, with multi-media computer workstations that link the library to the electronic resources of the Central Library and a vast array of databases. According to the LAPL, there are plans to expand the Van Nuys Branch library by adding approximately 1,686 square feet of parking and library space.²⁰

Other libraries in the surrounding area include the Panorama City Library, located at 14345 Roscoe Boulevard (4.1 miles north of the site) and the North Hollywood Library located at 5211 Tujunga Boulevard (3 miles southeast of the site).

ENVIRONMENTAL IMPACTS

THRESHOLD OF SIGNIFICANCE

The proposed project would have a significant adverse impact on public services if it:

- results in substantial adverse physical impacts associated with libraries or need for new or physically altered libraries in order to maintain acceptable service ratios, or other performance objectives.

PROJECT IMPACTS

Proposed Project

The housing component of the proposed project could potentially generate a worst-case scenario of 323 residents. The increase in residential population could increase the demand for library services. As stated above, two libraries serve the project site: the Van Nuys Branch Library and the Valley Plaza Branch Library. As previously stated, the Van Nuys Branch library was renovated in late 1996. All public space was renovated including the circulation and reference desks. Renovations also included the addition of a multi-purpose room. In addition, the branch was converted into a “virtual electronic” library, with multi-media computer workstations that link the library to the electronic resources of the Central Library.

According to the Los Angeles Public Library Branch Facilities Plan *Criteria for New Libraries*, q 14,500 square foot facility is required to serve a population above 45,000 and a 12,500 square foot facility is required to serve a population below 45,000.²¹

The Los Angeles Public Library Branch Facilities Plan indicates that of the 19 proposed projects for expansions or new libraries, one new library is proposed for the East Valley/Valley Glen area.²² The library and parking would occupy approximately 14,500 square feet.²³ This would

²⁰ http://www.lapl.org/about/Branch_Facilities_Project_List.pdf. Accessed September 24, 2008.

²¹ http://www.lapl.org/about/Branch_Facilities_Project_List.pdf. February 12, 2009.

²² http://www.lapl.org/about/Branch_Facilities_Project_List.pdf. Accessed September 24, 2008,

be located near the project area and based on above-mentioned criteria, is anticipated to serve a population above 45,000. According to the same LAPL Facilities Plan, the Van Nuys Branch Library would be expanded to include an additional 1,686 square feet.²⁴

The additional residential population expected under the project is not anticipated to result in substantial adverse physical impacts associated with libraries. As described above, according to the Los Angeles Public Library, a new library intended to serve a population greater than 45,000 is proposed for the area (the permanent population of the site is estimated to be 323 residents). Additionally, an existing library would be expanded to include additional square footage. Significant impacts on library services are not anticipated to result.

Add Area

The 182 residential units included under anticipated development of the Add Area would increase the resident population in the Add Area. This could result in an increased demand for library services. However, as stated above, the area is serviced by two LAPL branches including a new library intended to serve a population greater than 45,000. Additionally, library renovations and expansions have been completed or are proposed for the area. This would result in a less than significant impact to library services.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Not applicable.

CUMULATIVE IMPACTS

This analysis is based on the projects identified in **Table III-3, Related Projects**. The related projects include various commercial/mixed-use, office, and residential projects located in the vicinity of the project that are currently under construction, approved but not built, or proposed for development.

Several of the related projects include residential developments that would increase the residential population of the area and could potentially increase demand on public library services. However, individual projects would undergo review to determine potential impacts to library services and appropriate mitigation would be provided. As stated earlier, LAPL already has plans to expand existing facilities in the area to serve the growing population and the proposed project would not have significant impacts on the existing library services. Consequently, the proposed project and the anticipated development of the Add Area would not contribute to significant cumulative impacts associated with library services.

²³ Ibid.

²⁴ Ibid.