

3.13 Public Services

This section describes the affected environment and regulatory setting for public services related to the Project Area and surrounding area. In addition, this section describes the potential impacts related to public services that would result from implementation of the proposed Project. As noted in the analysis below, impacts associated with Public Services during construction or operation of the proposed Project would be less than significant with mitigation.

Impacts related to Public Services may extend beyond the Project Area (i.e., the area of direct impacts resulting from construction and operation of the proposed Project). Therefore, the discussion of the affected environment and environmental impacts related to Public Services is based on the Project Study Area, which includes the Project Area and a surrounding half-mile buffer.

The information in this section is based on the *Community Impact Assessment* (GPA Consulting, 2019) and the *Traffic Impact Analysis* (Kimley-Horn and Associates, Inc., 2019) prepared for the proposed Project. It is unlikely that community conditions and traffic conditions have changed substantially from that described in these technical studies.

3.13.1 Regulatory Setting

A review of the various federal, state, regional, and local government regulatory requirements was conducted to identify regulations that relate to parks, recreational facilities, and open spaces. This section summarizes the various regulatory requirements that are relevant to the proposed Project.

3.13.1.1 City of Los Angeles General Plan

As required by the State of California, the City's General Plan addresses goals, policies, and standards related to land use, circulation, housing, conservation, open space, noise, and safety (City of Los Angeles, 2017). To address goals that meet the unique needs of the City, the General Plan also includes elements related to health and wellness, air quality, historic preservation and cultural resources, and public facilities and services. Several of the General Plan elements are currently undergoing revision. The General Plan elements that pertain to Public Services are described in more detail in the following sections.

Safety Element

The Safety Element of the City's General Plan addresses the protection of people from risks associated with natural disasters (City of Los Angeles, 1996). The Safety Element includes goals, objectives, and policies that guide the City's Emergency Operations Organization, which is the City's department responsible for emergency planning, training, and mitigation, as well as response and recovery operations. The Safety Element includes standards related to fire protection and prevention, such as standards for the location and expansion of fire facilities, access to structures and clearances around structures, and minimum road widths. The applicable goals, objectives, and policies are described below:

- **Goal 2:** A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.

- **Objective 2.1:** Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
- **Policy 2.16:** Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, clearances around structures) and other requirements or procedures related to fire suppression implement this policy.]

The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan:

- Fire stations should be located along improved major or secondary highways. If, in a given service areas, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway.
- Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus.
- If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress.
- The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 gallons per minute (gpm). would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm., not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more gpm., not less than 3 engine companies and 2 truck companies.

Framework Element

The General Plan Framework Element is a strategy for long-term growth that guides updates to the community plan and its elements, as required by California State law (Government Code Section 65300) (City of Los Angeles, 1996). The Framework Element describes the primary police and law enforcement services, as well as the fire prevention, fire protection, and Emergency Medical Service for the City. In addition, the Framework Element includes goals for ensuring that every neighborhood in the City has the necessary police protection and fire services to meet existing and future needs as well as ensure public safety. The goals, objectives, and policies in the Framework Element that pertain to police services, fire services, and recreation and park facilities include:

Police

- **Goal 9I:** Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
 - **Objective 9.13:** Monitor and forecast demand for existing and projected police service and facilities.
 - **Policy 9.13.1:** Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
 - **Objective 9.14:** Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
 - **Policy 9.14.1:** Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
 - **Policy 9.14.2:** Support the provision of additional sworn police officers to meet the safety needs of the City.
 - **Policy 9.14.3:** Pursue State, Federal, and other non-conventional funding sources to expand the number of sworn police officers.
 - **Policy 9.14.4:** Complete all funded capital facilities in as short a time as possible.
 - **Policy 9.14.5:** Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
 - **Policy 9.14.6:** Minimize the processing required to establish needed facilities and, if necessary, modify facility standards to utilize existing available structures for this purpose.
 - **Policy 9.14.7:** Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
 - **Objective 9.15:** Provide for adequate public safety in emergency situations.
 - **Policy 9.15.1:** Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.

Fire

- **Goal 9J:** Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
 - **Objective 9.16:** Monitor and forecast demand for existing and projected fire facilities and service.

- **Policy 9.16.1:** Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
- **Objective 9.17:** Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
 - **Policy 9.17.1:** Complete all currently funded and, as feasible, programmed fire service capital improvements by the year 2010.
 - **Policy 9.17.2:** Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
 - **Policy 9.17.3:** Develop an acquisition strategy for fire station sites in areas deficient in fire facilities.
 - **Policy 9.17.4:** Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing general plan amendments and zone changes or considering discretionary land use permits.
- **Objective 9.18:** Phase the development of new fire facilities with growth.
 - **Policy 9.18.1:** Engage in fire station development advance planning, acknowledging the amount of time needed to fund and construct these facilities.
- **Objective 9.19:** Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
 - **Policy 9.19.1:** Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
 - **Policy 9.19.3:** Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.

Recreation and Parks

- **Goal 9L:** Sufficient and accessible parkland and recreation opportunities in every neighborhood of the City, which gives all residents the opportunity to enjoy green spaces, athletic activities, social activities, and passive recreation.
 - **Objective 9.22:** Monitor and forecast demand for existing and projected recreation and park facilities and programs.
 - **Policy 9.22.1:** Monitor and report appropriate park and recreation statistics and compare with population projections and demand to identify the existing and future recreation and parks needs of the City.
 - **Objective 9.23:** Complete all currently programmed parks and recreation capital improvements by the year 2010, contingent on available funding.

- **Policy 9.23.1:** Develop a strategy to purchase and develop land for parks, which is consistent with the appropriate open space policies found in Chapter 6: Open Space and Conservation.
- **Policy 9.23.2:** Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.
- **Policy 9.23.3:** Establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreation opportunities.
- **Policy 9.23.4:** Pursue resources to clean-up land that could be used by the City for public recreation.
- **Policy 9.23.5:** Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.
- **Policy 9.23.6:** Identify and purchase, whenever possible, sites in every neighborhood, center, and mixed-use boulevard, and maximize opportunities for the development and/or use of public places and open spaces on private land in targeted growth areas.
- **Policy 9.23.7:** Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets, and public plazas.
- **Policy 9.23.8:** Prepare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005.
- **Objective 9.24:** Phase recreational programming and park development with growth.
 - **Policy 9.24.1:** Phase the development of new programs and facilities to accommodate projected growth.
 - **Policy 9.24.2:** Develop Capital Improvement Programs that take into account the City's forecasted growth patterns and current deficiencies.

3.13.1.2 City of Los Angeles Municipal Code

Los Angeles Fire Code

The 2017 Los Angeles Fire Code is part of the City's Municipal Code (Chapter V, Article 7), and incorporates the requirements outlined in the California Fire Code, as well as City amendments. The Fire Code includes, but is not limited to, requirements regarding fire safety during construction, emergency response, fire protection, and materials for existing and proposed buildings (City of Los Angeles, 2017). Division 9 of the Fire Code provides requirements related to fire department access, and response distance and fire-flow requirements for different land uses.

Los Angeles Building Code

The Los Angeles Building Code is a component of the City's Municipal Code (Chapter IX, Article 1), which provides regulations for the design, construction, quality of materials, use and occupancy, location, and

maintenance of all buildings and structures. The Building Code includes guidelines for fire-resistant materials and construction, as well as requirements for fire-protection systems. In addition, the Building Code provides safety guidelines, including requirements for exterior illumination and safeguards during construction.

3.13.2 Environmental Setting

3.13.2.1 Police Protection

Police protection services and law enforcement are provided by the Los Angeles Police Department (LAPD), which operates 18 stations throughout the City within the Central, South, West, and Valley Bureaus. The Project Area is within the Central Bureau and is served by the Central Division of the LAPD to the west of the Los Angeles River, and the Hollenbeck Division to the east of the Los Angeles River. There are no police stations within the Project Study Area. There are two police stations located just outside the half-mile buffer area, which are listed in **Table 3.13-1** (see **Figure 3.13-1**, Emergency Services).

Table 3.13-1: Police Stations

Location	Property Name	Address	Distance from Project Area
PD-1	Los Angeles Police Department Central Community Police Station	215 East Sixth Street in Los Angeles	Approximately 0.8 miles northwest of Project Area
PD-2	Los Angeles Police Department Hollenbeck Community Police Station	211 East First Street in Los Angeles	Approximately 0.9 miles northwest of Project Area

Source: (GPA Consulting, 2019)

The Project Area experiences minor delays in emergency response times due to the existing construction site and closure of the Viaduct as part of the Viaduct Replacement Project. As part of the Viaduct Replacement Project, a Work Area Traffic Control Plan and Traffic Management Plan were developed to provide alternate traffic detour routes, construction materials hauling routes, bus stops, transit routes and operation hours, pedestrian routes, and residential and commercial access routes for the construction period. Because the Project Area is currently a construction site with restricted public access, existing LAPD service demands are minimal.

The Park Ranger Division oversees the safety and preservation of parks within the City's Department of Recreation and Parks (RAP) system. Park rangers are sworn law enforcement officers and certified firefighters with credentials to fight fires and administer basic first aid (City of Los Angeles Department of Recreation and Parks, 2019). Park Rangers patrol City parks using a variety of different methods such as vehicle patrols, mounted unit patrols (i.e., horseback), and foot-beats (i.e., foot or bicycle). Currently, the Park Ranger Division provides service to primarily Griffith Park, Runyon Canyon Park, Elysian Park, Hansen Dam Recreation Area, Ernest E. Debs Regional Park, and Ken Malloy Harbor Regional Park. In

addition to the park ranger system, an existing memorandum of understanding (MOU) between LAPD and RAP requires LAPD to patrol all parks in the RAP system.

3.13.2.2 Fire Protection

The Los Angeles City Fire Department (LAFD) provides fire prevention and suppression services, as well as emergency medical services, within the City. The LAFD operates three divisions, which include 18 battalions and over 100 fire stations. The Project Area is served by Battalion 1 of the Central Bureau of the LAFD. There are no fire stations within the Project Study Area. There are four fire stations located just outside of the Project Study Area, which are listed in **Table 3.13-2** (see **Figure 3.13-1**, Emergency Services). The average operational response times for emergencies in 2017 are also included on **Table 3.13-2** (Los Angeles Fire Department, 2017).

As discussed in Section 3.13.2.1, the Project Area experiences minor delays in emergency response times due to the existing construction site and closure of the Viaduct as part of the Viaduct Replacement Project. Because the Project Area is currently a construction site for the Viaduct Replacement Project, construction activities are required to incorporate LAFD recommendations and comply with applicable standards and permits, including Fire Code requirements regarding fire department access, response distances, and fire-flow. Therefore, existing fire protection demands are minimal.

Table 3.13-2: Fire Stations

Location	Property Name	Address	Distance From Project Area	2017 Response Times (minutes, seconds)
FD-1	Los Angeles Fire Department Station 4	450 East Temple Street in Los Angeles	Approximately 0.6 miles northwest of Project Area	EMS: 6 mins, 19 secs Non-EMS: 6 mins, 3 secs Critical ALS: 5 mins, 30 secs Structure Fire: 4 mins, 24 secs
FD-2	Los Angeles Fire Department Station 2	1962 East Cesar Chavez Avenue in Los Angeles	Approximately 0.9 miles northeast of Project Area	EMS: 6 mins, 24 secs Non-EMS: 6 mins, 11 secs Critical ALS: 5 mins, 33 secs Structure Fire: 4 mins, 40 secs
FD-3	Los Angeles Fire Department Station 25	2927 Whittier Boulevard in Los Angeles	Approximately 0.7 miles southeast of Project Area	EMS: 6 mins, 46 secs Non-EMS: 6 mins, 29 secs Critical ALS: 6 mins, 8 secs Structure Fire: 3 mins, 45 secs
FD-4	Los Angeles Fire Department Station 17	1601 South Santa Fe Avenue in Los Angeles	Approximately 0.7 miles south of Project Area	EMS: 6 mins, 38 secs Non-EMS: 6 mins, 31 secs Critical ALS: 5 mins, 35 secs Structure Fire: 5 mins, 19 secs

mins = minutes, secs = seconds, EMS = Emergency Medical Services, ALS = Advanced Life Support
Source: (GPA Consulting, 2019; Los Angeles Fire Department, 2017)

Figure 3.13-1: Emergency Services

3.13.2.3 Parks

The Project Area is primarily commercial and industrial, and there are no existing parks or recreation facilities. For additional discussion of parks and recreational facilities in the Project Study Area, see Chapter 3.14.

3.13.3 Environmental Impact Analysis

3.13.3.1 Screening Analysis

Several impacts and corresponding thresholds of significance in the following section were eliminated from further analysis in this EIR, including a discussion of public schools and other public facilities. These topics were eliminated because the IS for the proposed Project concluded there would be “No Impact,” or impacts were identified to be “Less Than Significant... and will not be discussed further in the EIR.” Only the topics described in the section below were determined to require further analysis in this EIR. Please see Chapter 3.14 for a discussion of parks. A copy of the Initial Study, which contains the eliminated topics, is provided in **Appendix A**.

3.13.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and the *L.A. CEQA Thresholds Guide*, the proposed Project would have a significant impact on Public Services if it would:

XV(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

- Fire Protection
- Police Protection

K.1 Police Protection. The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

- Parks

K.4 Recreation and Parks. The determination of significance shall be made on a case-by-case basis, considering the following factors:

- The demand for recreation and park services anticipated at the time of project buildout 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.

3.13.3.3 Construction Impacts

XV(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

(i) Fire Protection

Because the Project Area is already a construction site, impacts on fire protection services from proposed construction activities are anticipated to be similar to the existing condition. During construction of the proposed Project, hazards associated with construction sites, such as the operation of mechanical equipment and use of flammable materials, would increase the risk of personal injury and fires. However, construction contractors and workers would be required to comply with mandatory Occupational Safety and Health Administration (OSHA) and California Occupational Safety and Health Administration (Cal/OSHA) regulations to minimize these hazards. The proposed Project would comply with the Los Angeles Building Code to ensure that proper safeguards to protect construction site workers, pedestrians, and neighboring properties are in place.

During construction, lane or road closures and the movement of construction equipment on local roads could affect fire protection services, such as emergency vehicle response. However, these impacts would be temporary and would not result in lasting effects. Construction-related trips would be scheduled with increased frequency during off-peak hours to minimize congestion that could delay emergency vehicles. Temporary detour routes would also be provided to minimize delays to emergency vehicles. In addition, the nearest LAFD responders would be notified to coordinate emergency response routing during construction. Despite road or lane closures, emergency vehicles would continue to have the right-of-way, and emergency vehicle response would not be substantially affected. In addition, the proposed Project would be required to comply with Los Angeles Fire Code standards to ensure that access to fire hydrants and fire lanes is provided.

Project construction would require the removal of contaminated soils, and the use of materials that could be hazardous (e.g., paints, sealants, cement). The transport, use, and disposal of these materials would be conducted in compliance with applicable federal, state, and local laws pertaining to the safe handling, transport, and disposal of hazardous materials, including the provisions of the LAFD, Hazardous Materials Unit, which include requirements for the use and storage of hazardous materials (see Section 3.8 for additional details). Therefore, impacts related to the use of hazardous materials would be less than significant.

During construction of the proposed Project, the construction of additional facilities is not expected to be required to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, impacts would be less than significant, and no mitigation is required.

(ii) Police Protection

Because the Project Area is currently a construction site, impacts on police protection services from proposed construction activities are anticipated to be similar to the existing condition. During construction, lane or road closures and the movement of construction equipment on local roads could affect police protection services. However, these impacts would be temporary and would not result in lasting effects. In addition, the nearest LAPD station would be notified to coordinate emergency response routing during construction. Despite road or lane closures, law enforcement vehicles would continue to have the right-of-way, and police response would not be substantially affected.

During construction, the Project Site would be fenced and screened, and access would be controlled to deter theft, vandalism, and other crimes. Construction of additional facilities is not expected to be required to maintain acceptable service ratios, response times, or other performance objectives for police protection. The contractor would provide private security personnel to patrol and guard the site after work hours. If any traffic control plans are needed during construction, the nearest local police station would be notified to coordinate emergency response routing. Therefore, with implementation of these security features impacts would be less than significant, and no mitigation is required.

(iii) Parks

The proposed Project does not include the construction of housing, and construction workers would commute to the job site on a daily basis. Therefore, temporary construction of the proposed Project would not result in population growth that would increase the number of visitors to existing parks or other recreational facilities. Impacts would be less than significant, and no mitigation is required.

3.13.3.4 Operational Impacts

XV(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

(i) Fire Protection

The proposed Project would not include the construction of housing that would increase the population within the Project Study Area. However, the open space, recreational facilities, and events hosted in the park would increase traffic and visitors in the Project Study Area when compared to the existing construction site. Therefore, the demand for LAFD services would potentially increase. Project plans would be reviewed by the LAFD, and the final design of the proposed Project would be required to incorporate LAFD recommendations. In addition, fire prevention measures would be incorporated into building plans in accordance with the California Fire Code and City's Fire Code. The proposed Project would also be evaluated based on whether adequate access and any special equipment is provided onsite for firefighters. Therefore, impacts would be less than significant.

Proposed programming for the park includes large events with an estimated maximum capacity of up to 5,000 people (additional estimates for event capacity included in **Table 2.1**). For larger events, the proposed Project may require additional emergency services. However, large events would require

approval from the LAFD, and any additional permits or requirements from the LAPD, Department of City Planning, and Department of Public Works. By incorporating LAFD recommendations and complying with applicable standards and permits, impacts would be less than significant.

Because the proposed Project would attract visitors to the Project Study Area, additional traffic could result in impacts to service ratios or response times. The *Traffic Impact Analysis* (Kimley-Horn and Associates, Inc., 2019) prepared for the proposed Project identifies two intersections (Hewitt Street at Fourth Street and Santa Fe Avenue at Third Street) that would operate at level of serviceⁱ (LOS) F during the PM peak hour in Existing (2018) With Project Conditions. However, the LOS at these intersections is expected to improve with implementation of the proposed Project, when compared to the LOS for the existing industrial land use (see Section 3.15 for additional discussion). Therefore, impacts to service ratios and response times would not be significant.

During large events, the LOS at these two intersections would also operate at LOS F during the PM peak hour. By implementing a site-specific traffic control plan for large events (see Section 3.15.4), impacts to service ratios or response times would be minimized. Mitigation measures to promote alternate modes of transportation, such as the creating mobility and bike share hubs, creating rideshare zones, and analyzing potential locations for creating and expanding public transportation in the vicinity of the proposed Project Site would be implemented to further minimize impacts due to traffic during large events (see **MM-TRANS-1**, **MM-TRANS-2**, **MM-TRANS-3**, and **MM-TRANS-4** in Section 3.15.5).

The proposed Project would not be located in a fire hazard area. To prevent hazards that would increase the need for fire protection, the proposed Project would be constructed in accordance with all applicable fire codes set forth by the state Fire Marshall and LAFD. The proposed Project would not create a fire hazard and would not require services that would exceed the capacity of LAFD to serve the site or surrounding areas.

Project operation would require the minor use of materials that could be hazardous, such as paint for the sports field(s), pesticides and fertilizers for the landscaping, and other materials used for maintenance of the facilities. The transport, use, and disposal of these materials would be conducted in compliance with applicable federal, state, and local laws pertaining to the safe handling, transport, and disposal of hazardous materials, including the provisions of the LAFD, Hazardous Materials Unit, which include requirements for the use and storage of hazardous materials (see Section 3.8 for additional details). Therefore, impacts related to the use of hazardous materials would be less than significant.

The proposed Project would incorporate LAFD recommendations and comply with applicable standards and permits, including Fire Code requirements regarding fire department access, response distances, and fire-flow. Therefore, the proposed Project is not expected to result in the need for the expansion of or construction of new fire protection facilities. Impacts would be less than significant, and no mitigation is required.

(ii) Police Protection

The proposed Project would not include the construction of housing that would increase the population within the Project Study Area. However, the open space, recreational facilities, and events hosted in the

ⁱ LOS describes the quality of traffic flow, ranging from LOS A (free flow conditions) to LOS F (excessive delay). See Section 3.15 (Transportation) for additional information.

park would increase traffic and visitors in the Project Study Area when compared to the existing condition. Because the proposed Project would increase the number of people in the Project Area, the demand for LAPD services could potentially increase. Project plans were reviewed by the LAPD, and the proposed Project would be required to incorporate LAPD recommendations in the final design. Once the proposed Project becomes part of RAP jurisdiction, the police protection services in the park would be covered by the existing park ranger system and the MOU between LAPD and RAP.

Proposed programming for the park includes large events with an estimated maximum capacity of 5,000 people (additional estimates for event capacity included in **Table 2.1**). For larger events, the proposed Project may require additional security and law enforcement services. Large events would require approval from the LAPD, and any additional permits or requirements from the LAFD, Department of City Planning, and Department of Public Works.

The proposed Project would increase traffic and visitors in the Project Study Area and provide additional public access to the LA River, when compared to the existing construction site. Therefore, there could be an increased demand for additional police protection, especially during flood conditions and public events. As discussed above, police protection services in the park would be covered by the existing park ranger system and LAPD, as mandated in the existing MOU. By incorporating LAPD recommendations and complying with applicable permits, the proposed Project is not expected to result in the need for the expansion of or construction of new police protection facilities. Therefore, impacts would be less than significant, and no mitigation is required.

The proposed Project would conform to the California Building Code, which establishes the minimum construction, engineering, and safety requirements for new buildings. In addition, the proposed Project includes lighting along the park's perimeter and sidewalks, and at the playgrounds, performance stages, and sports fields. Park lighting would be limited to the proposed operating hours (between 5:00 a.m. and 10:30 p.m.) and would be consistent with the City's Municipal Code and River Improvement Overlay (RIO) Ordinance (Ordinance Number 183145). The lighting would meet the following requirements to improve visibility near roadways and in dark areas, increase the sense of security for park users, and deter crime (Horton Lees Brogden Lighting Design, 2018):

- Provide adequate vertical illuminance to identify a face from a distance of at least 30 feet;
- Be uniform throughout the Project Site to reduce the necessity for eye adjustment when scanning or using the area;
- Minimize glare that would result in annoyance, discomfort, or loss in visibility; and
- Provide uniform vertical illuminance to minimize shadows.

There are several streets that bisect the park (i.e., Santa Fe Avenue, Mesquit Street, Mission road, Anderson Street, and Clarence Street), which could result in safety hazards from oncoming motorists for visitors traveling throughout the park. Raised pedestrian crosswalks would be provided at these intersections to increase safety and visibility for pedestrians and bicyclists. In addition, the eastern end of the proposed Arts Plaza and the western end of the proposed East Park border several railroad tracks. Existing fencing separates the railroad tracks from the proposed Project Site, minimizing risks to public safety and security.

With the safety features described above, the proposed Project is not expected to increase the demand for police services. Therefore, impacts would be less than significant, and no mitigation is required.

(iii) Parks

The proposed Project would not result in population growth or substantial employment growth that would increase the demand for existing parks or other recreational facilities in the Project Study Area. The proposed Project would not require the expansion of existing park facilities for construction of new park facilities. Rather, the proposed Project would provide additional recreation and park services that may alleviate the demand for other existing parks and recreational facilities in the Project Study Area (for additional discussion see Chapter 3.14). Therefore, impacts would be less than significant, and no mitigation is required.

3.13.4 Best Management Practices

There are no best management practices for Public Services. With implementation of the best management practices identified in Section 3.15.4 (Transportation), impacts associated with delays to emergency vehicles would be avoided or minimized.

3.13.5 Mitigation Measures

There are no mitigation measures for Public Services. The mitigation measures identified in Section 3.15.5 (Transportation) address impacts associated with traffic concerns. As discussed in Section 3.15.5, traffic control plans for large events shall identify emergency services egress and access. Therefore, impacts on Public Services would be less than significant.

3.13.6 Significant Unavoidable Adverse Impacts

With implementation of the mitigation measures described in Section 3.15.5 (Transportation), there are no significant unavoidable adverse impacts on Public Services resulting from implementation of the proposed Project.

3.13.7 Cumulative Impacts

The cumulative setting for Public Services is the Project Study Area. Within Central City North, proposed development projects include residential and live/work units, commercial spaces (i.e., office and retail), and hotels. These proposed development projects could result in an increase in permanent residents and visitors to the Project Study Area, and therefore an increase in the demand for police and fire protection services within the Project Study Area. Higher demand for police and fire protection services could contribute to adverse impacts related to Public Services (i.e., a reduction in acceptable service ratios, response times, or other performance objectives that would require the need for new or physically altered governmental facilities).

However, proposed development projects would be required to meet the City's response distance, emergency access, fire flow, and other safety standards and requirements in the Los Angeles Fire Code and Building Code. Proposed development projects would also be subject to review by LADOT, LAPD, and LAFD to minimize any potential impacts. In addition, proposed developments would be evaluated based on whether they are consistent with the City's General Plan and Municipal Code. Currently, there

are no fire or police stations that are proposed for development within the Project Study Area. Therefore, the proposed Project would not result in cumulative impacts related to fire and police protection.

An increase in residential units could also increase the usage of parks and recreational facilities within the Project Study Area, which could contribute to the deterioration of existing park facilities. However, these proposed development projects would be required to comply with the Quimby Act and City Ordinance Number 184505, which require proposed housing developments to set aside funds or land for the provision of parks and recreational facilities (for additional discussion, see Section 3.14). Proposed developments would also be evaluated based on whether they are consistent with the City's General Plan and other local development regulations. In addition, the proposed Project would provide open space and recreational opportunities for these communities, helping to alleviate usage of nearby parks and recreational facilities. Therefore, the proposed Project would not result in cumulative impacts related to parks.