

3.13 PUBLIC SERVICES

Public services provided to the Zoo include fire and emergency medical response and law enforcement. The City provides adequate local fire response, emergency medical response, and law enforcement services to the Zoo. Further, onsite Zoo security, first aid facilities, and fire management practices implemented by the Zoo reduce demand for emergency response, fire protection, and law enforcement services. The Zoo also supports the North Hollywood High School’s Zoo Magnet Center onsite. The Vision Plan would not increase service populations requiring additional or expanded public services. Implementation of mitigation to address potential interruptions in site emergency access during construction, vehicle theft/break ins, and Zoo Magnet Center parking would reduce impacts to less than significant.

This section describes existing public services, including fire protection, emergency medical services (EMS), law enforcement, public school, and library services provided within the City of Los Angeles (City), analyzes the potential impacts from increased demand for these services that could result from implementation of the proposed Los Angeles Zoo Vision Plan (Project) for the Los Angeles Zoo and Botanical Gardens (Zoo). Table 3.13-1 identifies the public service providers for the Zoo and surrounding City areas. Parks and recreational resources, including Griffith Park, nearby hiking and equestrian trails, and nearby public parks are analyzed in Section 3.14, Recreation.

Table 3.13-1. Public Service Serving the Zoo

<table>
<thead>
<tr>
<th>Public Services Provided</th>
<th>Service Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Protection and EMS</td>
<td>Los Angeles Fire Department (LAFD)</td>
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<td>Law Enforcement</td>
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<td>Los Angeles Public Library</td>
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</tbody>
</table>

3.13.1 Environmental Setting

Regulatory Setting

Federal Regulations

The following federal regulations apply to fire and fire protection services. There are no federal regulations that pertain to local law enforcement, local public schools, or libraries.
3.13 Public Services

Uniform Fire Code

The Uniform Fire Code includes specialized technical fire and life safety regulations that apply to the construction and maintenance of buildings and land uses. The Uniform Fire Code addresses fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings.

Code of Federal Regulations (CFR)

Under 29 CFR 1910.38, when required by an Occupational Safety and Health Administration standard, an employer must have an Emergency Action Plan in writing, kept in the workplace, and available to employees for review. Minimum elements of an Emergency Action Plan include the following procedures: reporting a fire or other emergency; emergency evacuation, including type of evacuation and exit route assignments; employees who remain to operate critical plant operations before they evacuate; accounting for all employees after evacuation; and employees performing rescue or medical duties.

Under 29 CFR 1910.39, an employer must have a Fire Prevention Plan. A Fire Prevention Plan must be in writing, be kept in the workplace, and be made available to employees for review. Under 29 CFR 1910.155, Subpart L, Fire Protection, employers are required to place and keep in proper working order, fire safety equipment within facilities.

State Regulations

The following state regulations apply to fire and fire protection services and local public schools. There are no state regulations that pertain to local law enforcement or libraries.

California Fire Code (Title 24, Part 9, California Code of Regulations)

The California Fire Code is Part 9 of the California Code of Regulations (CCR), Title 24, and is also referred to as the California Building Code (CBC). The CBC includes regulations which are consistent with nationally recognized standards of good practice, intended to facilitate protection of life and property. Among other things, its regulations address the mitigation of the hazards of fire explosion, management and control of the storage, handling and use of hazardous materials and devices, mitigation of conditions considered hazardous to life or property in the use or occupancy of buildings and provisions to assist emergency response personnel.

California Health and Safety Code

State fire regulations set forth in Sections 13000 et seq. of the California Health and Safety Code, address building standards, fire protection and notification systems, provision of fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.
California Code of Regulations Sections

Under Title 19 of the CCR, the California State Fire Marshal develops regulations relating to fire and life safety. These regulations have been prepared and adopted to establish minimum standards for the prevention of fire and for protection of life and property against fire, explosion, and panic. The California State Fire Marshal also adopts and administers regulations and standards necessary under the California Health and Safety Code to protect life and property.

CCR Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any construction of new residential, commercial, and industrial uses within their boundaries to fund the construction of new schools or school facilities. CCR Section 65995 limits the maximum fee that school districts can assess. Section 65996 designates Section 17620 of the Education Code and Section 65970 of the Government Code to be the exclusive method for considering and mitigating development impacts on school facilities.

California Occupational Safety and Health Administration

In accordance with the CCR, Title 8, Sections 1270, Fire Prevention, and 6773, Fire Protection and Fire Fighting Equipment, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and EMS. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Emergency Management Agency

The California Emergency Management Agency was established as part of the Governor’s Office on January 1, 2009, and created by Assembly Bill (AB) 38, which merged the duties, powers, purposes, and responsibilities of the former Governor’s Office of Emergency Services with those of the Governor’s Office of Homeland Security. The California Emergency Management Agency is responsible for the coordination of overall state agency response to major disasters in support of local government. The agency is responsible for assuring the State’s readiness to respond to and recover from all hazards – natural, manmade, war-caused emergencies and disasters – and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

Emergency Response/Evacuation Plans

Government Code Section 8607(a) directs the Governor’s Office of Emergency Services to prepare a Standard Emergency Management System program, which sets forth measures by which a jurisdiction should handle emergency disasters. The program is intended to provide effective management of multi-agency and multijurisdictional emergencies in California. The Standard Emergency Management System program consists of five organizational levels,
which are activated as necessary: 1) Field Response; 2) Local Government; 3) Operational Area; 4) Regional; and 5) State.

California Education Code

The California Education Code contains provisions governing the siting, design, and construction of new public schools. In selecting a future school sites, school districts should consider factors influencing the safety of the site such as proximity to airports, railroads, high voltage power transmission lines, presence of toxic and hazardous substances, and hazardous air emissions within one-quarter mile.

Senate Bill (SB) 50 and Proposition 1A School Funding

Senate Bill (SB) 50 amends Section 17620 of the Education Code, to authorize school districts to levy statutory developer fees at levels that may be significantly higher than those previously permitted, but also provides new and stricter standards for school districts to follow when levying fees. School Districts would continue to be authorized to charge development fees (also known as Level 1 fees) of $1.93 per square foot on residential buildings and $0.31 per square foot on commercial or industrial buildings. However, pursuant to Government Code Sections 65995.5 and 65995.7, SB 50 authorizes school districts to charge additional Level 2 development fees to match 50 percent of school construction costs of state funds, and Level 3 development fees to fund 100 percent of school construction costs if state funds are not available.

Section 65996 of the Government Code, School Mitigation Fees

Section 65996 designates Section 17620 of the Education Code (the mitigation fees authorized by SB 50) and Section 65970 of the Government Code to be the exclusive method for considering and mitigating development impacts on school facilities.

AB 181 and AB 2962

AB 181 and AB 2962 require school districts to pay a share of the cost of school construction based on the square footage of residential, commercial, and industrial construction taking place within their districts. The law commissions school districts to levy a Developer Impact Fee for this purpose, establishes the maximum rate of the fees, and prohibits building permit authorities from issuing building permits without certification from the school district that fee requirements have been met.

Local Regulations

City of Los Angeles Municipal Code (Fire Protection)

The Los Angeles Municipal Code (LAMC) includes regulations and standards related to Public Safety and Protection (Title 5). Fire regulations are set forth in the City of Los Angeles 2014 Fire Code (Chapter V, Article 7 of the Municipal Code). The Zoo is required to comply with all
applicable Fire Code standards, including those listed in the LAFD letter on scope of the Project dated April 3, 2018.

The City Fire Code incorporates by reference chapters of the California Fire Code, including Appendix D, and amends fire regulations to local conditions. Under Section 57.103.3.2.2 (Function), the function of the Bureau of Fire Prevention and Public Safety shall be to administer and enforce the fire prevention and life safety provisions of this article and shall include but not be limited to the following:

1. The prevention of fires.
2. The investigation of the cause, origin, and circumstances of fire or life safety hazards.
3. The elimination of fire and life safety hazards in any building or structure, including those under construction, any premises, marine vessel, aircraft, vehicle, or the appurtenances and equipment thereof.
4. The maintenance of fire protection equipment and systems.
5. The regulation of storage, use, and handling of hazardous materials and hazardous substances.
6. Enforcement of the basic building regulations of the State Fire Marshal as they apply to the City of Los Angeles in matters relating to fire, panic, and explosion safety.

Fire Code Section 57.507.3.1 (Fire-Flow Requirements) establishes minimum fire flow requirements in gallons per minute (gpm) according to designated land use. Fire flow requirements for a commercial use are 6,000 to 9,000 gpm, with a minimum residual water pressure of 20 psi (Fire Code Table 57.507.3.1, Fire Flow by Type of Land Development).

Fire Code Section 57.507.3.3 (Land Use) sets forth requirements for maximum response distances. Fire Code Section 57.512 (Response Distances that if Exceeded Require the Installation of an Automatic Fire Sprinkler System) requires the installation of automatic fire sprinkler systems for buildings that are located in excess of established response distances. Fire flow distances for commercial uses are 1 mile for an Engine Company and 1.5 miles for a Truck Company.

Los Angeles Fire Department Strategic Plan
The City of Los Angeles Fire Department (LAFD) Strategic Plan outlines goals and strategies to improve fire protection and response throughout the City. Goals and relating strategies relevant of wildfire include:

- Goal 1: Provide Exceptional Public Safety and Emergency Service
  - Strategy 3: Improve fire suppression services.
  - Strategy 5: Prepare for large scale disasters.
  - Strategy 6: Ensure and optimal state of readiness focusing on terrorism and disaster preparedness.
City of Los Angeles Municipal Code, Charter, and Administrative Codes (Police Protection)

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

City of Los Angeles Emergency Operations Plan

The City’s Emergency Management Department maintains and leads the citywide emergency plans, revises, and distributes the Emergency Operations Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response and recovery plans. The Emergency Management Department also reviews and tests departmental emergency plans to ensure City departments are ready to fulfill their respective emergency missions. These annexes identify roles, responsibilities and required actions for various City departments, particularly LAFD, the Los Angeles Police Department and, in some cases, the Zoo Department. Annexes that are particularly relevant to the Zoo and wildfire hazards include the Brushfire Annex, the Early Warnings and Notifications Annex, the Evacuations Annex, and the Mass Care and Sheltering Annex - Large Animal Support Appendix. These annexes address brush fire emergency response, notifications and warnings, evacuation guidelines and care or sheltering of large animals, including those from the Zoo. Every other year, the Emergency Management Department – Planning Division leads a formal review of the Emergency Operations Plan departments and agencies that are identified within each Annex, as well as any other departments or agencies that may need to be part of the review process. If, at any time, a department, agency, or stakeholder to the Emergency Operations Plan changes, develops, or amends any policy, procedure, or operation that will change or affect the contents, that entity is to immediately notify the Emergency Management Department—Planning Division.

Los Angeles Zoo Fire Preparedness, Response, and Emergency Evacuation Plans

The Zoo Safety and Administrations Offices maintain the Los Angeles Zoo Procedure Manual. This document includes the Zoo’s Fire Preparedness and Response Plan and Zoo Staff and Volunteer Evacuation Plan, most recently updated in April 2017. Together, these
plans described procedures for the Zoo to implement in preparation for a fire or in response to a fire incident. These plans address or outline the following procedures:

- Lines of command and communication;
- Notification of a fire incident;
- Identification of Zoo and LAFD incident commanders;
- Responsibilities of Zoo departments;
- Zoo employee and visitor evacuation instructions;
- Staff evacuation meeting location in the Zoo's southern parking lot; and
- Animal collection, immobilization, crating, relocation, and evacuation, including California Condor Evacuation Procedures. If it is necessary to relocate animals off Zoo grounds, they shall be transported to the Magnet School parking lot.

Zoo Security Division has primary responsibility for carrying out an evacuation under the direction of the Zoo Incident Commander with assistance as needed from other divisions (e.g., Animal Care Division, Admissions, Visitor Services).

City and County of Los Angeles Disaster Route Maps

Disaster Routes are freeway, highway, or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas to save lives, protect property and minimize impact to the environment. During a disaster, these routes have priority for clearing, repairing and restoration over all other roads. Disaster Routes are not evacuation routes. Although an emergency may warrant a road be used as both a disaster and evacuation route, they are completely different. An evacuation route is used to move the affected population out of an impacted area. The County of Los Angeles (County) has designated disaster routes that are used to bring emergency personnel, equipment, and supplies to impacted areas. These include the Interstate 5 (I-5) and State Route 134 (SR-134) in the Project vicinity, which are designated primary disaster routes (Los Angeles County Department of Public Works 2012). San Fernando Road located 0.53 miles east of Project site, is designated a secondary disaster route by the County. The City also designates these same roads as disaster routes.

Draft Department of Recreation and Parks Standard Operating Procedure - Griffith Park Emergency Operations

This Standard Operating Procedure (SOP) provides guidance and procedures for the coordination of the Department of Recreation and Parks (RAP) response during emergency operations in Griffith Park. The SOP identifies RAP sections of Griffith Park, including the Zoo. The SOP establishes that the RAP Operations Section Chief shall be a park ranger and shall communicate with sections if necessary, including emergency notifications and how and where a Mobile Command Post (MCP), shall be set up. Under direction of RAP On-Scene Coordinator (OSC), Operations Section will coordinate traffic control, evacuation routes,
information distribution, wayfinding and other objectives as directed by the RAP OSC. These procedures have not been adopted and are subject to change.

**City of Los Angeles Public School Plans**

The City of Los Angeles Public School Plan prepared by the Department of City Planning and the Board of Education outlines objectives to provide a full range of public educational facilities of sufficient size and safety. Future school sites should be selected based on land use compatibility and opportunity for schools to contribute to local identity.

**City of Los Angeles Public Libraries Plan**

The City of Los Angeles Public Libraries Plan, prepared by the Department of City Planning and the Library Department outlines objectives to continue superior library services and expand where appropriate, locate potential future library sites, enhance the central library and overall library efficiency including using a bookmobile system.

**City of Los Angeles Municipal Code (Libraries)**

Powers and duties of the Library Department are outlined in Article 5 of the Los Angeles Charter and LAMC. The Library Department establishes, manages, controls, and operates a central library and branch libraries within the City.

**Existing Setting**

**Fire Protection and Emergency Response**

The LAFD provides fire protection services and EMS within the City. The LAFD also subcontracts private ambulance providers (Freeman 2013). In total, the LAFD has approximately 3,246 personnel, of whom 1,018 are sworn firefighters. At any given time, there are approximately 1,018 uniformed firefighters on duty, including 270 serving as firefighter/paramedics, strategically located across the 106 stations serving the LAFD’s 471 square-mile jurisdiction (LAFD 2020b).

The LAFD is divided between three branches, all overseen by the fire chief: Administrative Operations, Administration Chief of Staff, and Emergency Operations (LAFD 2020a). Service areas of the Emergency Operations branch are organized based on geographic area and fall into one of four bureaus, each of which is commanded by a Deputy Chief. The bureaus are further subdivided into battalions. In total, the City contains 14 battalions and 106 stations that support firefighting and emergency response services divided between four bureaus, including:

- **Valley.** The Valley Bureau encompasses the entire San Fernando Valley portion of Los Angeles. Battalions 10, 12, 14, 15 and 17 are in Valley Bureau.
- **West.** The West Bureau encompasses the western portion of Los Angeles. Battalions 4, 5 and 9 are in West Bureau.
• **Central.** The Central Bureau encompasses Downtown Los Angeles and the surrounding communities. Battalions 1, 2, and 11 are in Central Bureau.

• **South.** The South Bureau encompasses the southern portion of Los Angeles. Battalions 6, 13, and 18 are in South Bureau.

The Project site is served by Station No. 56 of Battalion 5 of the West Bureau, located at 2759 Rowena Avenue, approximately 3.06 miles from the Project site in Silver Lake. Station No. 56 is an engine and rescue company that houses Engine 56, Rescue 56, and Heavy Rescue 56. Station No. 56 is staffed by 18 personnel within three platoons, all of which are sworn firefighters. At least one platoon is on duty at any given time, which consists of 3 firefighter/paramedics, 1 firefighter, 1 engineer, and 1 captain. (Captain Decker, LAFD Station No. 56, Personal Communication, December 28, 2019).

Emergency access to the Zoo is currently available regionally by SR-135 and I-5 and locally via Crystal Springs Drive, Zoo Drive, and Griffith Park Drive. Access into the Zoo is available at the employee and service entrance located south of the Zoo Entry from Crystal Springs Drive and at the Gottlieb Animal Health and Conservation building from Griffith Park Drive. When needed, the Zoo can also support emergency responders via existing access roads within the Zoo and staging areas for first responders. For example, in response to recent Griffith Park wildfires, LAFD used the Zoo parking lot for staging of command operations and equipment (see also, Section 3.17, *Wildfire*).

In the event of wildfire, the Zoo and LAFD dispatch brush patrols within the Zoo and monitor wildfire movement, flare ups, or hot spots, while firefighting crews establish fire breaks or defense lines and lay hoses around the Zoo’s perimeter (Deputy Chief Hogan, Commander of the LAFD West Bureau, Personal Communication, January 14, 2020). In addition, the Zoo maintains perimeter sprinkler systems and water line available for fire suppression along the ridgeline of the California planning area of the Vision Plan. These systems water down the perimeter to provide suppress flammability during a wildfire event, as occurred during the wildfire event on November 9, 2018 (Tom LoVullo, Zoo Director of Construction and Maintenance, Personal Communication, January 8, 2020). Within the interior developed areas, the Zoo maintains a network of fire hydrants consisting of 12 fire hydrants throughout the Zoo along internal roads and pedestrian paths. All Zoo buildings are equipped with fire alarm systems, and newer structures are equipped with fire sprinkler systems (Tom LoVullo, Zoo Director of Construction and Maintenance, Personal Communication, January 8, 2020). Smoking is also banned within the interior of the Zoo and permitted only in the main parking lot.
3.13 Public Services

Fire and Emergency Response Times

The National Fire Protection Association (NFPA) develops, publishes, and disseminates recommended standards for fire response services. NFPA standards address fire department turnout time (i.e., elapsed time from when a unit is dispatched until that unit changes their status to “responding”) of 1 minute or less. NFPA also establishes travel times (i.e., elapsed time from when a unit is en route to the emergency incident until the unit arrives at the scene) for fire protection services and EMS operations. Under these NFPA standards, a fire department should establish a time objective of 4 minutes or less for arrival of the first arriving engine company. For EMS operations, travel times of fire departments should also be within 4 minutes. EMS calls needing advanced life support should arrive within 8 minutes. These performance objectives should be met 90 percent of the time (NFPA 2019).

LAFD has not adopted the NFPA standards but aims to maintain services in alliance with NFPA recommendations. LAFD maintains several response metrics to track and gauge fire protections services in the City, including:

- **Operational Response Time:** The time interval that starts when first contact is made (either through 911 or the fire dispatch center) and ends when the first Standard Unit arrives on-scene.¹
- **Call Processing Time:** The time interval that starts when the call is recorded by a Fire Dispatcher until the initial Fire or EMS unit is dispatched.
- **Turnout Time:** The time interval between the activation of station alerting devices to when the first responders put on their personal protection equipment and are aboard apparatus and en route (wheels rolling). Both station alarm and en route times are required to measure this for each unit that responds. Turnout time is calculated for each unit dispatched to each incident.
- **Travel Time:** The time interval begins when the first Standard Unit is en route to the incident and ends upon arrival of any of the Standard Units first on scene. This requires one valid en route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events, and unspecified incident locations, may impact travel time.
- **Incident Count:** The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification. Incident types are recorded, including special metrics for:
  - **Advanced Life Support (ALS) Critical Incidents:** This incident type includes all ALS incidents that are marked for immediate dispatch. This includes most types of critical incidents.

¹ A standard unit has the capacity or equipment to administer the full suite of lifesaving services. Other units are only deployed in special circumstances and lack either the capacity or equipment to deliver the full suite of lifesaving services. These specialized units are not considered under any current metric examined by the LAFD.
- **Structure Fire Incidents**: This incident type indicates that a building or structure is reported to be actively burning. This category is calculated on a quarterly basis due to their frequency of occurrence.

In 2019, LAFD responded to 499,167 incidents citywide, a 1.62% increase over the prior year and a record high. LAFD daily incident average increased to 1,368, up from 1,346 in 2018. LAFD responded to 4,109 structure fire incidents in 2019, or an average of 11.3 per day. LAFD transported 215,605 patients to local hospitals, a 0.6% decrease from the prior year (LAFD 2020). LAFD average response times citywide were generally consistent with NFPA recommendations, only exceeding NFPA standards for total response time by 36 seconds for EMS and 22 seconds for non-EMS calls (Table 3.13-2).

In 2019, LAFD Station No. 56 responded to 1,860 EMS incidents and 709 non-EMS incidents, including 164 critical ALS incidents and 27 structure fires. Station No. 56 held an average operational response time of approximately 7 minutes 39 seconds for EMS calls and 7 minutes 42 seconds for non-EMS calls, which are both within 2 minutes of NFPA standards. Station No. 56 also maintained overall response times of 6 minutes 51 seconds for ALS calls and 5 minutes 7 seconds for structure fire incidents (LAFD 2019). Of these, LAFD responded to approximately 16 non-EMS incidents at the Zoo in 2019 with an average response time of 10 minute 44 seconds (City of Los Angeles 2019). The engines from Station No. 56 were dispatch 75.5% of the time in response to calls. Demand for LAFD services to the Zoo is reduced due to provision of an onsite security team that assumes first-aid responsibilities and can handle some EMS-related incidents (see also, Police Protection below). A summary of LAFD and Station No. 56 response times in comparison to national standards is provided in Table 3.13-2.

**Table 3.13-2. Los Angeles Fire Department Response Metrics (2019)**

<table>
<thead>
<tr>
<th>NFPA Standards</th>
<th>EMS</th>
<th>Difference from NFPA Standards</th>
<th>Non-EMS</th>
<th>Difference from NFPA Standards</th>
<th>EMS</th>
<th>Difference from NFPA Standards</th>
<th>Non-EMS</th>
<th>Difference from NFPA Standards</th>
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</thead>
<tbody>
<tr>
<td>Call Processing Times</td>
<td>1:04</td>
<td>0:00</td>
<td>1:04</td>
<td>0:00</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Turnout Time</td>
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<td>0:51</td>
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<td>Travel Time</td>
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<td>1:25</td>
<td>5:26</td>
<td>1:26</td>
</tr>
<tr>
<td><strong>Total Response Time</strong></td>
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<td>6:40</td>
<td>6:26</td>
<td>0:22</td>
<td>7:39</td>
<td>1:35</td>
<td>7:42</td>
<td>1:38</td>
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</table>

Notes:
1. The point of receipt of the emergency alarm at the answering center, to the point where sufficient information is known to the dispatcher and applicable units are notified of the emergency.
2. NFPA 1221 establishes that call processing should be completed within 64 seconds 90 percent of the time, and within 106 seconds 95 percent of the time.

Source: LAFD 2019b; NFPA 2019.
Many factors affect response times of the LAFD, such as roadway congestion, intersection level of service (LOS), weather conditions, topography, road width, public events, and unspecified incident locations. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation, has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green when LAFD engines and ambulances have their sirens on and are approaching signalized intersections. This helps to ensure LAFD arrives at a scene as quickly as possible and improves safety by stopping other traffic. The City has over 205 miles of major arterial routes that are equipped with FPS (Los Angeles Department of Transportation 2016).

Although response time is one metric of fire protection services, it is one of many factors that LAFD uses to evaluate its performance in response to fires and life and health safety emergencies. Other considerations include the number and types of incidents typical to a service area; quality and extent of fire water flow, pressure, and infrastructure provided in a service area; distance from existing fire stations and accessibility of fire personnel to service areas; and the LAFD’s assessment of unique needs in the service area. For example, if the number of incidents a service area increases, or the type of services needed expands (e.g., taller buildings requiring ladder trucks), it is LAFD’s responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the City of Hayward v. Board Trustee of California State University (2015)242 Cal, App. 4th 833, 847 ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and EMS. Currently, based on communications with LAFD, fire protection and EMS are adequately provided to the Project site and the vicinity, and there are no new or expanded facilities needed to continue providing adequate services (City of Los Angeles 2019).

**Police Protection**

LAPD provides police protection services within the City and is the third largest municipal police department in the U.S., covering an area of approximately 473 square miles and providing police protection services to a population of 3.8 million (LAPD 2019a). The standard equipment used by the LAPD includes handguns, rifles pelican flashlights, personal radios, tactical vests, tasers, ballistic helmets, hand cuffs, police cars and motorcycles. Specialized equipment is
also available to adequately equip special units such as K-9, bomb squad, underwater dive, SWAT, off-road enforcement, air support, or mounted units (LAPD 2020a). As with all municipal police departments in Los Angeles County, the LAPD participates in the Mutual Aid Operations Plan for Los Angeles County, a reciprocal agreement between signatory agencies including local police departments to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril (County of Los Angeles 1998).

LAPD employs approximately 10,034 sworn personnel and 2,961 civilian personnel (LAPD 2019b). The LAPD contains three offices of law enforcement services: Operations, Special Operations, and Support services (Moore 2020). The Special Operations Office includes a Counter Terrorism Bureau, a Transit Services Bureau, and a Detective Bureau. Service areas are organized according to geographic location and fall into one of four bureaus, each of which is led by a Deputy Chief. The bureaus are further divided into 21 divisions, each of which is commanded by a senior captain that oversees patrol units, commanded by junior captains:

- **Valley.** Valley Bureau is responsible for policing the San Fernando Valley. Valley Bureau oversees operations of seven divisions: Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley. Valley Bureau also includes a Valley Traffic Division which is responsible for the investigation of traffic collisions and traffic-related crimes for all of Valley Bureau. Valley Bureau serves an area encompassing 226 square miles and a population of roughly 1,426,071 million people (LAPD 2020b).

- **West.** West Bureau is responsible for policing the western end of the City, Hollywood, Los Angeles World Airport, Venice Beach, and its vicinities. West Bureau covers a 124-square-mile territory with a population of approximately 840,400 residents. West Bureau oversees operations of five divisions: Hollywood, Wilshire, Pacific, West Los Angeles, and Olympic. West Bureau also includes the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile (LAPD 2020c).

- **Central.** Central Bureau covers a 65-square-mile area with roughly 900,000 people and includes the communities as Downtown, Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium, and Griffith Park. Central Bureau oversees the operations of five divisions including: Central, Hollenbeck, Newton, Rampart, and Northeast, which serves the Griffith Park and the Project site. The Central Bureau also oversees operations of the Central Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the Central Bureau (LAPD 2020d).

- **South.** South Bureau has a population of roughly 640,000 people, encompasses 57.6 square miles, and includes such notable facilities such as the University of Southern California (USC), Watts Towers, the Harbor Gateway, the Port of Los Angeles, and the Exposition Park Museums. The South Bureau oversees operations in four divisions:
Harbor, 77th Street, Southeast and Southwest. South Bureau also oversees four specialized entities, including the South Traffic Division, responsible for the investigation of traffic collisions and traffic related crimes for all South Bureau, and a Special Enforcement Unit, Complaint Unit, and Sexual Assault Investigative Team (LAPD 2020e).

LAPD stations typically police an average population of approximately 200,000 people and are generally self-contained, except for larger crime investigations (Gascon 2020).

Griffith Park and the Project site are located within the service area of the Northeast Community Police Station (Northeast Division) of the Central Bureau. The station is located at 3353 San Fernando Road approximately 2.9 miles southeast of the Project site. The Northeast Division provides service to a population of about 250,000 people over a 29-square mile area that includes the communities of: Los Feliz, Eagle Rock, Elysian Valley, Silver Lake, Franklin Hills, Cypress Park, Highland Park, Echo Park (North of Sunset Boulevard), Atwater, East Hollywood (East of Normandie Avenue), Mount Washington; Glassell Park, and Griffith Park (LAPD 2019c). The Northeast Division is staffed by approximately 280 sworn officers, providing ratio of 1 officer to 893 residents by the Northeast Station (Lieutenant Gomez, LAPD, Personal Correspondence, March 3, 2020). These police officers are supervised by a staff of 32 sergeants (Sergeant Zboravan, Northeast Community Police Station, Personal Communication, March 2, 2020). Northeast Division deploys patrol units 24 hours a day, 356 days a year. On any given day, there are approximately 30 to 40 officers deployed on patrol, responding to calls in the field (Lieutenant Gomez, LAPD, Personal Correspondence, March 3, 2020). Patrols may increase during weekends, holidays, special events, or period in the summer. Staffing in the Northeast Division, as with all of LAPD, fluctuates and is generally assessed monthly (Sergeant Zboravan, Northeast Community Police Station, Personal Communication, March 2, 2020).

**LAPD Calls for Service and Response Times**

The LAPD determines staffing needs based on both the total number of calls and types of service required, identification of district-specific law enforcement demands, such as traffic control or special enforcement, and community input. Long term staffing need is determined through consideration of trends of city population, crime rates, calls for service and response times. To maximize and maintain workforce potential, the LAPD set goals to strengthen recruitment efforts, especially in the hiring of female, African-American, or Asian Pacific Islander officers, as well as to enhance employee succession programs and promote employee wellness (LAPD 2019c).

The Northeast Division has been consistent in meeting the response time targets. In 2019, the LAPD received 979,592 calls for service, approximately 2.8 percent of these calls, or 27,429, were placed within the service area for Northeast Division (LAPD 2019b; County of Los Angeles Open Data 2020a), equal to approximately 58 calls for service per officer. Sergeant II Zboravan of the Northeast Division characterized the most common calls within the service...
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area of the Northeast Division as relating to property crimes such as break ins of a home, business, or motor vehicle. The Northeast Division is currently equipped with sufficient vehicles, tactical equipment, and staff to continue providing acceptable levels of police services to the community (Sergeant Zboravan, Northeast Community Police Station, Personal Communication, March 2, 2020). There are no current needs or plans to expand or improve the Northeast Station or increase the number of personnel assigned to the Northeast Station (LAPD Northeast Police Station 2020).

**LAPD Crime Statistics**

An indicator of police service levels is the number of “Part I” crimes, which are reported in two categories: violent crimes and property crimes. Aggravated assault forced sexual assault, homicide, and robbery are classified as violent. Arson, burglary, larceny-theft, and motor vehicle theft are classified as property crimes. The City experienced approximately 140,000 Part I crimes in 2017, 131,393 Part I crimes in 2018, and 122,251 Part I crimes in 2019, resulting in an average ratio of 34.5 Part I calls per 1,000 residents from 2017 to 2019, with a slight decline in crime each year (LAPD 2019d). The LAPD attributes its 7 percent decrease in Part I crimes in the past year to its initiatives in community outreach, gang intervention, and increased patrols.

In 2019, the Northeast Division made 3,369 arrests. The most common charge code for arrests was under a narcotics charge making up 407 or 12 percent of arrests, followed by drunkenness making up 336 or 10 percent of all arrests and aggravated assault making up 310 or 9 percent of arrests. These numbers are generally consistent with arrests over the past four years (County of Los Angeles Open Data 2020b).

In general, the geographic area surrounding the Project site has a low density to very low-density violent crime occurrence (LAPD 2018). Between September 2019 and February 2020, a total of 277 incidents were recorded within a 1-mile radius of the Zoo, with 33 incidents recorded at the Zoo. The greatest number of recorded incidents at the Zoo made were for vehicle theft or break-ins (30 counts, approximately 91 percent) (CrimeMapping 2020). Based on the Zoo’s average monthly attendance of approximately 150,308 persons and an average of 6.6 incidents per month, the Zoo experiences an estimated crime ratio of 1:22,774 crimes per persons.

Given the Zoo is a visitor destination that attracts thousands of people daily and has open accessibility to the Zoo’s parking lot, high rates of vehicle theft and break-ins with personal property theft is not surprising. For instance, in the same period of time, approximately 91 crimes were reported at Universal Studios Hollywood, the most common of which was for vehicle theft or break in (CrimeMapping 2020). Based on average monthly attendance of approximately 762,500 persons (Statista 2020) and an average of 18.2 crimes per month, Universal Studios Hollywood experiences an estimated crime ratio of 1:41,896 crime per persons, less than that currently experienced at the Zoo. Nevertheless, the frequency of vehicle theft/break ins at the Zoo is considered an ongoing issue due to the openness of the
parking lot areas, number of vehicles present, hours of time cars are left parked, and a lack of surveillance (e.g., security cameras) or regular patrol of the parking lot.

**Other Law Enforcement Services**

**Griffith Park Rangers**

Additional law enforcement services within Griffith Park are carried out by Los Angeles Department of Parks and Recreation (RAP) park rangers and security officers. Park rangers are sworn law enforcement officers and certified firefighters with credentials to fight fires and administer basic first aid. A total of 33 RAP park rangers and 85 security officers (not sworn law enforcement) patrol Griffith Park and respond to between 20 and 30 calls on a given weekday and between 40 and 50 calls on a given weekend day (Griffith Park Rangers 2020). The park rangers and security officers also respond to activities and incidents observed while patrolling the park and immediate vicinity, such as lost hikers, drinking, and smoking within the park. The park rangers provide first response protection for Griffith Park, while typical ranger duties include patrolling, responding to calls for assistance, providing emergency services (i.e., firefighting, search, and rescue), and supporting community education services (LAPD 2015). The most common incidents that park rangers and security officers respond to are related to medical incidents from dehydrated, lost, or injured hikers and fires within the park (Griffith Park Rangers 2020).

**Zoo Security**

The Security Services Division (SECS) of the LAPD is responsible for the safety and security of the Zoo, as well as City buildings, facilities, parks, shops, yards and warehouses, the Zoo, Public Works Bureau of Sanitation Water Treatment Facilities, City Libraries, City Parks and all non-proprietary City facilities, their employees and visitors. SECS consists of three major components: the police officer component; the security officer component; and the contract security officer component.

- **Police Officer Component** The police officer component is responsible for all law enforcement-related activities surrounding specific City facilities.
- **Security Office Component.** These are unarmed security officers who are City employees. These full-time and “as needed” (part and half time) unarmed civilian security officers staff fixed post positions at various City facilities and rely on the police component to respond to any issues deemed law enforcement related.
- **Contract Security.** Contract security is comprised of private security guards and administered by the SECS.

SECS provides supplementary security at within the Zoo is provided by an onsite security team that assumes policing and first-aid responsibilities, with additional support from off-site LAPD when required. A total of 23 security officers are currently employed at the Zoo, including 1 principal security officer and 1 senior security officer. All security officers are City employees. None of the Zoo security officers are privately contracted or are sworn officers.
Zoo security officer deployment is based on a Memorandum of Agreement between the Zoo and LAPD. As such, security staffing varies between watches; however, security staffing increases during hours the Zoo is open to the public, with additional staffing during peak attendance days such as during holidays and summer weekends. The number of incidents Zoo security responds to in a day varies substantially, with a greater number of calls on weekend days. Most common incidents include vehicle theft, injury, and lost children. All crime-related incidents involve response from the SECSD and the Northeast Division.

**Schools**

LAUSD is the second largest school district in the nation. LAUSD serves a 710-square mile area, including most of the City along with all or portions of 26 cities and unincorporated areas of Los Angeles County. The LAUSD has over 1,300 schools throughout the District, with more than 673,000 enrolled and 63,500 employed making it the second largest employer in Los Angeles County. LAUSD provides kindergarten through 12th Grade (K-12) public school education in the service area, as well as supplemental adult education services to the neighborhoods adjacent to Los Angeles County. The LAUSD traditional education program includes core curriculum. Individual schools supplement students’ education with a variety of elective courses in compliance with the standards created and adopted by the State of California (LAUSD 2019).

LAUSD uses data on live births in Los Angeles County, historical grade retention ratios, economic factors, and other relevant information to project future enrollment trends (LAUSD 2020a). Estimated enrollments in grades K-12 are calculated using a variety of scenarios, generally involving weighted and true averages. LAUSD enrollment peaked in 2002-2003 at 746,831 and has declined each year since. LAUSD enrollment is anticipated to continue to decline 1 to 2 percent each academic year, with an estimated total decline of 17 percent from 2019 to 2030 (Perez and Prichard 2019). This trend is due to several factors, including the reduced birth rate in Los Angeles County and the increasing cost of living, including housing, in southern California (LAUSD 2019). Changes in enrollment are also attributed to trends of student enrolling in private charter schools. The chart below shows the increase in the number of students enrolled in independent charter schools over the past decade. In contrast, LAUSD’s total K-12 enrollment has declined over the same period.
The decline in student enrollment creates opportunity for the LAUSD to further goals of reducing class size and removing portable classrooms (Perez and Prichard 2019). The LAUSD determines available space for new students by comparing district capacity with space needed. Space needed is determined by reviewing historic enrollments of the past four years along with the projected enrollment in five years to determine the maximum seats needed to house students in existing homes. Currently, the LAUSD district capacity is 702,113 students and currently supports an enrollment of 648,867 students. As a result, the LAUSD has an additional remaining capacity of 53,246 students (Schoolworks, Inc 2018).

The 1,300 schools of the LAUSD are organized based on geographic location and fall under one of six local districts: Central, East, Northeast, Northwest, South and West. Each local district is overseen by and Administrator of Operations. The Project site falls within the Central district, which covers a geographic area bordered by Glendale to the north and Pasadena to the east. Communities included in the Central district include Arlington Heights, Mid-City, Hollywood, Westlake, Wilshire Vista, and Harvard Heights. The Local District Center currently has a Facilities managed by Local District Central include: 24 high schools; 17 middle schools; 87 elementary schools; 21 early education centers; 9 primary centers; 6 option schools; and 3 special education centers (LAUSD 2020a).

**Zoo Magnet Program**

Magnet Programs are Court-Ordered voluntary integration opportunities available to students in grades K-12 living within the LAUSD and provide specialized coursework focusing on a study area. LAUSD offers 311 magnet programs divided between 8 themes: Science/Technology/Engineering/Math (STEM), public service, business, communication arts, center for enriched studies, gifted/highly gifted, liberal arts, and visual and performing arts. Since 1981, North Hollywood High School (NHHS) of LAUSD has partnered with the
Los Angeles Zoo to provide a Zoo/Biological Sciences Magnet program for NHHS students grades 9-12 (NHHS 2020).

The North Hollywood High School Zoo Magnet Center is located at 5336 Crystal Springs Drive within Zoo’s southern parking lot. The North Hollywood High School Zoo Magnet Center is a magnet center of the North Hollywood High School and provides students with specialized courses on animal studies and biological sciences, such as animal husbandry, animal behavior, and zoology, while observing and conducting research at the Zoo facilities and in the nearby park. Senior students enrolled in the program participate in an animal husbandry internship where students are paired with a zookeeper and act as an assistant zookeeper. Students are assigned to a group of animals under the management of their mentoring zookeeper and learn animal care and perform such duties as preparing food, cleaning enclosures, and providing enrichment activities for the animals (Brie-Anna Molina, North Hollywood High School, E-mail Correspondence, March 2, 2020). The animal husbandry internship is limited to 30 students per semester. The North Hollywood High School Zoo Magnet Center courses include specialized biological science courses and core curriculum that meet LAUSD’s requirements (Zoo Magnet Center North Hollywood High School 2020).

The Zoo Magnet Center enrollment is competitive with a full capacity of approximately 300 students in total and approximately 75 students enrolled in each grade. The Zoo magnet center program does not currently plan to expand student enrollment, and capacity may be shifted downward to accommodate LAUSD’s goals to reduce class sizes (Brie-Anna Molina, North Hollywood High School, E-mail Correspondence, March 2, 2020).

Transportation to and from Zoo Magnet Center and the North Hollywood High School is provided to students via a shuttle bus that departs from the North Hollywood High School campus in the morning and during the school’s lunch period. The shuttle returns to the North Hollywood High School campus after lunch and again at the end of the school day. Parking for school buses, faculty and staff is available within the existing parking lot.

Zoo Magnet Center staff include 10 teachers, an office clerk, and a student counselor. The Zoo magnet campus includes nine classrooms divided between three temporary bungalows and occupies approximately 13,800 square feet. The temporary bungalows have been present at the school since its opening in 1981. School facilities have recently undergone external painting, repaving, and the installation of external loudspeakers. No other improvements to the Zoo Magnet Center are currently planned, although the school is considering placing another temporary bungalow within the existing campus boundaries to expand space for teachers (Brie-Anna Molina, North Hollywood High School, E-mail Correspondence, March 2, 2020). All Zoo Magnet Center facilities and programs are private or for school use only.

**Libraries**

There are two library systems that provide service to residents of Los Angeles within the vicinity of the Project site: the Los Angeles County Library and the Los Angeles Public Library.
The Los Angeles County Library system provides services to over 3.4 million residents living in unincorporated areas and to residents of 49 of the 88 incorporated cities in Los Angeles County. The service area extends over 3,000 square miles, providing a 7.5 million book collection, magazines, newspapers, government publication and many specialized materials including online data bases (County of Los Angeles 2019b).

The Los Angeles Public Library system serves areas within the City. The Los Angeles Public Library provides 73 locations and serves the largest population of any public library system. On an average day, approximately 45,000 people visit a Los Angeles Public Library, 4,200 people connect to public Wi-Fi provided by the library, and 1,700 people attend a library hosted program. The Los Angeles Public Library website is accessed approximately 73,000 times a day and provides service directory and access to a catalog of over 6 million books, audiobooks, periodicals, DVDs, and CDs available for checkout. The Los Angeles County Library system consists of a staff of 1,560 and 1,666 volunteers (Los Angeles Public Library 2015).

Atwater Village Library, located at 3379 Glendale Boulevard, approximately 2.4 miles southeast of the Zoo and approximately 7,300 square feet, is the nearest Los Angeles Public Library Branch the Project site. The Atwater Village Library staff consists of five full time employees, approximately 10 part-time employees, as well as occasional volunteers. Atwater Library is frequented by a diverse range of age groups within the West Hollywood community, with daily visitors typically ranging anywhere from 5 to 30 people a day (Atwater Village Library 2020). The Atwater Village Library provides programs to appeal to all age groups such as story time readings for babies, toddlers and young children, game and crafts nights targeted at kids and teens, and a scrabble club and computer skill workshop targeted at adults and senior citizens (Los Angeles Public Library 2020). Additionally, the library provides free Wi-Fi, computers, and printers for public use, making it a significant resource for lower-income residents.

3.13.2 Impact Assessment Methodology

Significance Thresholds

According to Appendix G of the CEQA Guidelines, a project would have a significant impact related to public service resources if it would:
3.13 Public Services

a. 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
ii. Police Protection
iii. Schools
iv. Parks
v. Other public facilities

Additionally, the L.A. CEQA Thresholds Guide states that determination of significance to police protection and fire protection and EMS shall be made on a case-by-case basis after considering the following factors:

**Fire Protection and Emergency Medical Services**

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

**Police Protection**

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

**Public Schools**

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

Non-applicable Thresholds:

• Threshold (v) (Libraries): The Project has no residential components and would not accommodate additional population. As further addressed in Section 5, Other CEQA Considerations, the proposed Project would not substantially increase the local residential population or induce growth. The Project may create approximately 660 new full-time equivalent jobs that would be filled by residents in the region. Any growth in population induced by the proposed Project is expected to be insubstantial and is not anticipated to directly increase demand for library services within the City and surrounding area. Further, no public libraries exist on the Project site or immediate vicinity that would be affected by the Project. Therefore, there would be no impacts to libraries and this issue is not further addressed in this analysis.

Methodology

This analysis considers impacts to fire protection, police protection, and schools. As previously described, there would be no impacts to libraries and potential impacts to public parks, including potential impacts to Griffith Park, is considered in Section 3.14, Recreation. There are no other public services provided in the vicinity or that would be affected by the Project.

This analysis evaluates Project-related increases in demand for fire protection, EMS, police services, and schools based on the adequacy of existing and planned services or facilities to meet the demands of the Project. Existing service levels, facilities, and equipment were determined through direct communications with staff from LAFD, LAPD, and LAUSD, along with review of publicly available data such as LAFireStat. Information regarding the existing and projected service capacities was obtained from City-published response metrics and published data and documents of LAFD, LAPD, and LAUSD. Personal correspondence with staff from the Zoo, LAFD, LAPD, and Zoo Magnet Center were also utilized in the preparation of this analysis.

Impacts to fire protection and EMS are evaluated based on compliance with LAFD and City development standards and the adequacy of LAFD to maintain service for the Zoo with the Project. As discussed above, the LAFD has not adopted objectives for response times. While existing response times are an important tool in assessing adequacy of fire protection services, impacts are also assessed based on required fire flow (LAMC Fire Code Section 57.507.3.1), response distance from existing fire stations, and the LAFD’s judgement for needs in the area. This analysis considers these factors and the input from the LAFD in review of the Project.

Impacts to police protection services are evaluated based on LAPD resident-to-officer ratios, the number of calls for service, and crime rates of the Northeast Division of the Central
3.13 Public Services

Bureau. This analysis considers these factors and the input from the LAPD and Zoo Security in review of the Project.

Impacts to public schools focus on direct impacts to the Zoo Magnet Center, including potential changes to facilities or programming that may result from construction or operation of the Project. The analysis considers the location and condition of the campus on the Project site and the future programming and plans envisioned by LAUSD for the campus.

3.13.3 Environmental Impact Analysis

PS-1: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 fire protection?

Fire Protection and Emergency Medical Response

Construction

Project construction would introduce a potential ignition source for fires (e.g., flammable materials, sparks) and may create hazardous conditions requiring EMS. However, construction activities are temporary in nature and do not create continuing elevated risks requiring fire protection and EMS response. As documented in Section 3.13.1 above, LAFD maintains fire response and EMS at adequate levels to respond to incidents at the Zoo during Project construction. In addition, “good housekeeping” procedures would be employed by construction contractors and their work crews to minimize risks, which include proper maintenance of mechanical equipment and proper storage of flammable or other hazardous materials (refer also, Section 3.8, Hazards & Hazardous Materials). Application of these procedures reduce risk of potential fires, hazardous spills of other conditions during construction that would require fire protection and EMS. Further, construction of the Project would comply with Occupational Safety and Health Administration, LAMC Fire Code, and California Building Code (CBC) regulations pertaining to application of Best Management Practices (BMPs) and other measures for reducing risks associated with construction. Therefore, Project construction would not require additional firefighting or EMS personnel or new or expanded facilities.

Construction activities associated with the implementation of the proposed Project have the potential to affect fire protection services and EMS response times due to:

- Realignment of Crystal Springs Drive to the southern perimeter of the Zoo parking lot to unify the Zoo’s main parking lot and south parking lot, which may require temporary detours or lane closures.
• Detours and lane closures required for roadway improvements such as the intersection of Zoo Drive and Western Heritage Way and those associated with Zoo’s proposed southern parking lot improvements.
• Periodic construction traffic and congestion associated with the import and export of 220,000 cubic yards of grade and fill (refer to Table 2-26), materials delivery, and worker commute trips.
• Disruptions to internal access while portions of the Zoo are closed during phased construction.

The Project would be constructed incrementally over seven phases, implemented sequentially through 2040. Each construction phase would begin after completion of the previous phase and there would be no overlap in construction activities associated with each phase. Construction activities would result in temporary changes to roadways, access points, and staging areas currently used by LAFD to respond to incidents in the Zoo and nearby areas in Griffith Park.

The Project would not directly impair designated County or City Disaster Routes along I-5, SR-134 and San Fernando Road, as all development would be contained to the Zoo and roadways serving the Zoo. Roads surrounding the Zoo provide direct firefighting and emergency access to the western and southern sides of the Zoo and the southeastern area of Griffith Park. Temporary disturbance of these roadways during Phase 1 (2020-2025) has the potential to temporarily block or delay emergency responders due to realignment and repaving of roadways and staging of large construction equipment. Specifically, the collective effect of potential reconstructing the Zoo Drive/Western Heritage Drive intersection and realigning Crystal Springs Drive during the same phase would potentially cause congestion during peak hour conditions that would obstruct fire engines and EMS vehicles and cause response time delays. These vehicles may also be required to navigate detours and other temporary traffic controls that can often change regularly during construction. Dedicated emergency access points to the Zoo may change or be incidentally blocked by these temporary conditions, which may delay response as firefighters and EMS personnel while alternate access is determined. Additionally, during Phase 7, the Zoo’s northern parking lot would undergo construction for a new multi-story parking structure, new public park, and surface parking lot retrofit, thereby temporarily reducing the parking and staging areas used by fire or EMS responders.

Construction of internal Zoo improvements, including visitor-serving uses, pathways, and access roads, would occur over seven phases where each phase would be completed prior to groundbreaking on the next phase. During construction of each phase, the area affected would be closed and fenced off for regular access while the remainder of the Zoo would remain open and accessible. This proposed phasing plan would limit disruption or obstruction of access and evacuation routes within the Zoo during construction. However, during Phase 1, the Zoo Entry and California planning areas would be under construction concurrently and closed to the public, which would impair both access and evacuation through the front gates. Also,
Throughout construction, internal rerouting and temporary closures of the proposed planning areas may block evacuation routes or cause circuitous or inefficient evacuation, as well as limit firefighter access to internal areas of the Zoo.

To ensure firefighters and EMS responders can efficiently reach the Zoo during Project construction, a construction-phase Zoo circulation and access plan would ensure that an alternate entrance and secondary access is available and clearly indicated and that firefighters and EMS responders could proceed directly to the most efficient entrance without undue delay or confusion. LAFD, including Station No. 56, would be notified of any Project traffic control plans implemented during construction of external roadway improvements (e.g., Crystal Springs Drive/Western Heritage Way) to coordinate emergency response routing. With this coordination, the proposed Project would not interfere with the ability of emergency response to access the site. Similarly, current Zoo access plans on file with LAFD would ensure that any temporary access routes delineated during construction would inform firefighters and EMS responders of alternate primary and secondary entrances.

Implementation of MM T-1, requiring a Construction Traffic & Access Management Plan with measures for controlling and ensuring continued access to the Zoo and through the interior of the Zoo circulation system, would address impacts from construction of proposed improvements on emergency access and response. Therefore, impacts associated with hinderance of emergency response times during Project construction would be less than significant with mitigation.

**Operation**

**Demand for Fire Protection and EMS**

The proposed Project would not induce residential population growth or result in direct population growth. However, the proposed Project would increase annual Zoo attendance from 1.7 million to 2.3 million by the end of Phase 1 of Project implementation (2020-2025), representing an annual attendance increase of 30 percent. By the time of Project completion in 2040, annual Zoo attendance is anticipated to reach 3 million. The proposed Project would also include the hiring of approximately 660 additional staff. As such, implementation of the Project has the potential to increase the number of persons within the Zoo at any given time compared to existing conditions (see Section 2.3.9.0, Project Operation). Increases in daily attendance consequently has the potential to result in increases the frequency of incidents with commensurate increases in demand for fire protection and EMS from LAFD.

The Zoo would continue to be served by Station No. 56, located approximately 3.06 miles southeast. Response times from Station No. 56 are within 2 minutes of NFPA standards. Upon review of the Project, the LAFD determined that it has adequate resources and personnel to continue to serve the Zoo under the Project without needing to expand any facilities or personnel (Captain Decker, LAFD Fire Station No. 56, personal communication,
December 28, 2019; Deputy Chief Hogan, Commander of the LAUSD West Bureau, personal communication, January 14, 2020).

Further, given LAUSD Fire Station No. 56 is located more than 1.5 miles away from the Zoo, the LAMC Fire Code Section 57.512 requires new development under the Vision Plan to install automated fire suppression systems (refer to section 3.13.1 Regulatory Setting). These requirements would maximize the Project site’s ability to handle fire-related emergencies onsite until emergency responders can arrive. Each Project planning area and improvement would be constructed in accordance with applicable sections of the LAMC Fire Code and CBC, which require the provision of adequate emergency access, use of ignition-resistant construction materials, emergency water supply and adequate fire flow rates, and appropriate defensible space requirements. The Project would also include emergency evacuation plans allowing for quick and safe evacuation of Zoo guests, employees, and specimens in the event of an emergency (See Section 3.15, Transportation). Consistent with LAUSD standards, this combination of development standards for new development and existing LAUSD service capabilities would ensure demands for fire protection and EMS would continue to be met under the Project. Therefore, no additional LAUSD facilities or personnel would be required to serve the Project and impacts related to fire response and EMS demand would be less than significant.

**Emergency Access**

Current response times of LAUSD Station No. 56 are within 2 minutes of NFPA standards, but response times to the Zoo itself appear to exceed standards by approximately 10 minutes, based on 2019 LAUSD data for non-EMS incidents. Delays are likely due to traffic congestion. The proposed Project would include improvements to existing roadways and circulatory systems both within and surrounding the Zoo, which would improve direct access to the Zoo for firefighters and EMS. Emergency access to the Zoo is currently available via Crystal Springs Drive, Zoo Drive, and Griffith Park Drive. Access into the Zoo is available at the employee and service entrance located south of the Zoo Entry from Crystal Springs Drive and at the Gottlieb Animal Health and Conservation building from Griffith Park Drive. Under the Project, emergency vehicles would access the Project site through either:

- The Zoo’s existing main service and administrative entrance on the east end;
• An improved delivery vehicle entry at the Gottlieb Animal Health and Conservation Center on the west end; or
• A new vehicle entrance proposed at the existing employee parking area at the north end of the Zoo within the California planning area.

Emergency vehicle access to the interior of the Zoo would be expanded and enhanced by the proposed improvements to the Project site’s internal circulatory system, including the reconfiguration of internal pedestrian and non-pedestrian service roads lining the boundaries of the Zoo, leading either to the Gottlieb Animal Health and Conservation Center or the proposed Service Center Building. Further, installation of a perimeter tram road and improved service roads would provide improved firefighter and vehicle access to high fire hazard areas along the Zoo’s perimeter. These improvements would create more direct and efficient emergency response access to all areas within the Zoo and would not degrade or further exacerbate existing emergency response times to the Zoo.

Proposed offsite improvements at the intersection of Zoo Drive and Western Heritage Way would also reduce congestion on local roads and both I-5 and SR-134. Proposed realignments of Zoo southern parking lot and surrounding roads would enhance vehicle flow and circulation onsite. Proposed parking improvements, including an additional 300 spaces at the east end of the Zoo Magnet Campus during Phase 1, the construction of a multi-story above ground parking structure on the north parking lot during Phase 7, and the addition of staff parking lots at the Gottlieb Animal Health and Conservation Center and proposed service center building, would expand parking availability, thereby reducing congested circulation as vehicles make multiple rounds in search of open parking spots. Such external improvements could reduce overall traffic congestion and increase site accessibility for emergency response vehicles as well (refer to Section 3.15, Transportation).

Proposed improvements to site circulation and access would maintain or improve the ability for emergency responders to access the site and handle fire or medical related emergencies. Therefore, Project impacts to fire protection and emergency response services would be less than significant.
PS-2: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 police protection?

**Police Protection**

**Construction**

Construction sites can be vulnerable to theft if left unattended and, therefore, have the potential to increase demand for police services to respond to incidents. During construction, the areas within the Zoo undergoing construction would be fenced and screened to prevent access by Zoo visitors and avoid potential construction-related safety hazards. Nighttime lighting would be provided, and access would be controlled to deter theft. Existing Zoo security personnel would continue to provide continuous patrol of the Project site. LAPD would be notified of construction-related traffic control plans to coordinate emergency response routing. Given that each Project phase would be fenced for safety and security and would be subject to periodic patrol by Zoo security personnel, thefts or other issues that would require LAPD intervention would likely be avoided or minimized during construction of the Project. Associated impacts on police protection services would be less than significant.

**Operation**

Measurement of LAPD performance is considered through crime rates, LAPD officer-to-resident ratios, calls for service and response times. As described in Section 3.13.1, the Project site is in an area with comparatively low crime rates, has an adequate officer-to-resident ratio, and provides adequate response times (LAPD 2019b; County of Los Angeles Open Data 2020a; Sergeant Zboravan, Northeast Community Police Station, Personal Communication, March 2, 2020). However, the Zoo currently experiences a relatively high number of vehicle theft/break ins. Under the Project, this trend is expected to continue since the Project would maintain the open, publicly accessible parking lot and does not propose measures to limit access or increase patrol or parking lot security.

The Project would expand Zoo facilities in the California and Africa planning areas with major facility renovations throughout the Zoo and would increase annual Zoo visitation by 1.2 million through 2040. Due to the project increase of Zoo guests under the proposed Project,
there may be an increased demand for additional police protection at and at the Zoo, with calls possibly related to theft, trespassing, car break-ins, or vandalism, especially during highly-attended special events. To address anticipated increase in demand for law enforcement services, the Project would include construction of a new 13,000 sf single-story security and first aid center, located within the proposed entry plaza where it would be easily accessible to Zoo guests, and the hiring of additional security personnel to accommodate the such needs. Zoo Security would continue to respond to most incidents at the Zoo, therefore, not causing a substantial increased demand for LAPD services. Because Zoo Security is provided onsite and would not regularly necessitate responses from community LAPD stations, the proposed Project would not substantially interfere with LAPD response times.

Further, improvements to Zoo facilities would include modernization of security systems such as access control to buildings, secured parking facilities, walls/fences with key systems, and well-illuminated spaces designed with a minimum of dead space to eliminate areas of concealment. Security at the Zoo is provided by an onsite security team that assumes policing and first-aid responsibilities, with support from LAPD when required. Most incidents occurring within the Zoo are responded to by the Zoo Security. All crime-related incidents involve response from SECSD and the Northeast Division.

However, the Vision Plan does not currently propose, or little detail is known about, improvements or increases in security or surveillance of the Zoo’s parking lots to address the high frequency of vehicle theft/break-ins. It is reasonable to assume that vehicle theft and break-ins would become an increasing law enforcement issue under the Project with substantial increases in visitation and frequency of high attendance days in which the parking lot areas would be full. Implementation of MM PS-1, requiring the Zoo implement measures to increase security of the Zoo’s parking lot areas such as frequent patrolling and installation of additional surveillance cameras, would help to reduce the likelihood for vehicle theft/break in and manage crime within the Zoo, thereby reducing LAPD and Zoo Security demands.

An estimated 660 new jobs are anticipated to be created under the Project. If all new jobs were also new residents, this growth would represent less than a 0.02 percent increase in the existing population and would not measurably affect the resident-to-officer ratio of the LAPD. Further, most jobs associated with the proposed Project are anticipated to be filled by the existing local or regional labor force within the City, surrounding cities, and surrounding Los Angeles region. Therefore, any net population increase spurred by the proposed Project is anticipated to be nominal and would not substantially affect LAPD officer-to-resident ratios.

Existing resources of the LAPD and Northeast Community Police Station are adequate to continue providing acceptable levels of service to the Zoo with the implementation of the proposed Project. Any negligible increase in population within the City or region because of the Project would be adequately serviced by existing LAPD facilities and personnel and would not require expansion of existing facilities or construction of new facilities. As discussed above, with implementation of MM PS-1 to address increased law enforcement issues from
vehicle theft/break ins, impacts to public safety and police protection services would be less than significant with mitigation.

**PS-3:** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts?

The proposed Project would not include residential development. Therefore, the Project would not result in an increased number of school-aged children in the LAUSD. The Project would create approximately 660 new jobs, but it is anticipated that these jobs would be filled by the existing local workforce, and, therefore, would not create population growth in the area, thereby increasing demand for public school services.

Enrollment trends of the LAUSD have been declining and this trend is anticipated to continue into 2030. Further, enrollment into the Zoo Magnet Center program is competitive and limited to 300 students. The Zoo has no direct influence over Zoo Magnet enrollment. Student acceptance and enrollment is determined by NHHS in compliance with LAUSD policies. The proposed Project would not alter existing facilities of the Zoo Magnet campus or initiate improvements that would expand the capacity of the Zoo Magnet program to support more students such as classroom seats, teachers, or funding. The Zoo Magnet Program currently has no plans to expand student enrollment or expand school facilities as to expand campus capacity to support students (Brie-Anna Molina, North Hollywood High School, E-mail Correspondence, March 2, 2020). As such, the Project would not spur academic enrollment, thereby eliminating potential for the proposed Project to exhaust existing school facilities or generate a need for expanded or additional public-school facilities. The Project would not require the addition of a new school or the expansion, consolidation, or relocation of an existing facility to maintain service levels, and construction activities would not adversely affect local schools.

The Project would not result in physical changes to existing LAUSD facilities, including the Zoo Magnet Center. As described in Section 2.0, Project Description, most Project improvements would occur within Zoo planning areas inside the Zoo and away from the Zoo Magnet Campus (see Figure 2-4). However, the Project would realign Crystal Springs Drive to the perimeter of the southern parking lot to link the Zoo Magnet Center parking lot with the Zoo’s main lot (refer to Figure 2-15). In addition, approximately 300 guest surface parking spaces would be added in the southern parking lot, immediately adjacent to the Zoo Magnet Campus through removal of existing Zoo uses and restriping of parking spaces.

The southern Zoo parking lot is utilized by Zoo Magnet Center school buses and staff in addition to visitors of the Zoo and Griffith Park. There are currently no designated parking spaces or stalls for Zoo Magnet Center school buses and staff. Historically, there has not been significant conflict in parking availability for Zoo Magnet Campus and Zoo guests. This is most likely because drivers affiliated with the campus arrive anywhere from 2 to 3 hours
before the Zoo opens at 10:00 A.M. and Zoo Magnet Campus does not operate on weekends when Zoo parking demand is highest. Competitive parking on weekends typically only occurs on occasions when teachers choose to work in their classrooms on weekends or host review sessions for Advanced Placement students (Brie-Anna Molina, North Hollywood High School, E-mail Correspondence, March 2, 2020). The Zoo Magnet Center also hosts Saturday morning cleanups once a semester, but this also begins hours before the Zoo opens and does not create competitive parking conflict. Additionally, the Zoo’s southern parking lot is positioned at a greater distance from the main entrance of the Zoo, making this parking less desirable to Zoo guests.

However, completion of the proposed Project is anticipated to increase daily attendance to the Zoo and substantially increase demand for Zoo parking (refer to Section 3.15, Transportation). Even with the construction of a new parking structure during Phase 7 and the additional 300 parking spaces to the southern parking lot during Phase 1, potential remains for an increased demand for parking to reduce parking availability for Zoo Magnet Center visitors, staff, and buses. To ensure parking availability remains for Zoo Magnet Center students and staff and avoid need for additional facilities to serve school operations, MM PS-2 would be required. Implementation of MM PS-2 would require improvements to the southern parking lot to include designated parking spaces for Zoo Magnet Center school buses and implement parking hour limitations to accommodate 10 teachers, the office administrator, and campus counselor, with an additional reserve space for visitors. Reserved parking stalls would be in effect during hours of Zoo Magnet Center operation. With implementation of this measure, Project impacts to schools would be less than significant with mitigation.

Despite potential impacts to parking, the Project has the potential to benefit the Zoo Magnet Center program through the expansion of Zoo exhibits and animal habitat. Zoo Magnet Center coursework often involves observations and fieldwork within the Zoo. Under the Project, expansion of resources available to Zoo Magnet Center students, including animal observation space, may improve the quality or quantity of educational opportunities to students. Further, as previously described, senior students in the program could engage in an animal husbandry internship where each student is paired with a zookeeper and assists that keeper in providing animal care to a group of animals managed by the zookeeper. Internships are limited to 30 open positions per semester, for a class size of approximately 75 students. Under the Project, expanded Zoo facilities would aid in the Zoo’s mission of expanding animal conservation programs and expand the Zoo’s capacity to provide care for additional animals. As such, the Project could increase both the number of zookeepers employed by the Zoo and animals under their care, which in turn, could expand the number of student animal husbandry internships the Zoo can provide.
3.13 Public Services

3.13.4 Mitigation Measures

The following measures are identified to ensure continued unhindered emergency access and response to the Zoo during construction of proposed improvements and to prevent impacts to the Zoo Magnet Center facilities regarding parking availability.

**MM T-1** shall apply.

**MM PS-1 Zoo Parking Lot Security Improvements**

In coordination with the City and LAPD, the Zoo shall prepare a Parking Lot Security Plan. The Plan shall identify and implement strategies to improve security within the Zoo’s parking areas to reduce vehicle theft/break in or other crimes. Strategies may include but not be limited to installation of surveillance cameras to provide 24-hour video coverage of all Zoo parking areas and frequent foot- or bicycle-based patrolling of the Zoo parking areas by Zoo Security personnel. LAPD shall review and approve the Plan and parking lot security improvements shall be implemented prior to completion of Phase 1. The parking structure improvements proposed as Phase 7 shall be equipped with video surveillance.

**MM PS-2 Zoo Magnet Center Parking Restrictions**

The City and Zoo shall work with the LAUSD North Hollywood High School Zoo Magnet Center to coordinate improvements to the southern Zoo parking lot in Phase 1 of the Project. Parking lot design and management shall ensure adequate provision of parking for the Zoo Magnet Center during peak Zoo attendance days. Measures may include, but not be limited to, reserved parking spaces for Zoo Magnet Center school buses and adequate spaces to accommodate teachers, the office administrator, and campus counselor, with an additional reserve space for visitors. Reserved parking stalls shall be in effect during hours of Zoo Magnet Center operation. Signage shall indicate all restrictions on public parking within the southern parking lot. All proposed parking improvements shall be noted on final plans and reviewed and approved by the City Bureau of Engineering and the LAUSD prior to Project construction of Phase 1.

3.13.5 Impacts Summary

With implementation of above identified mitigation measures, impacts to existing public services would be *less than significant*. There would be no unavoidable adverse impacts on fire protection, law enforcement, public schools, or other public services (e.g., libraries) associated with implementation of the proposed Project.