

5. Environmental Analysis

5.11 PUBLIC SERVICES

This section of the EIR addresses the Proposed Project's potential impacts on public services including: Fire Protection, Emergency, and Hospital Services; Police Protection; School Services; and Library Services. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems; are addressed in Section 5.13, *Utilities and Services Systems*. Please note that Sections 5.11 and 5.13 are formatted differently than the other sections in Chapter 5 so that issue areas (e.g., fire, police, schools, etc.) can be grouped together.

5.11.1 Fire Protection, Emergency, and Hospital Services

5.11.1.1 ENVIRONMENTAL SETTING

Regulatory Setting

State

California Fire Code

CCR Title 24 contains the regulations that govern the construction of buildings in California. The 2013 California Fire Code (CFC) (24 CCR Part 9) is based on the 2012 International Fire Code and includes amendments from the State of California fully integrated into the code. The CFC contains fire safety-related building standards that are referenced in other parts of CCR Title 24. The purpose of this code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to fire fighters and emergency responders during emergency operations. The CFC includes provisions for Group I-3 buildings, which include buildings and structures inhabited by more than five persons under restraint or security. The Office of the State Fire Marshal (SFM) reviews and approves state-regulated buildings such as jails and hospitals for compliance with the CFC.

California Building Code

The 2013 California Building Code (24 CCR Part 2) contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. Part 2, Section 1231, Minimum Standards for Adult Detention Facilities, provides minimum standards for local detention facilities. A local detention facility is any city, county, city and county, or regional jail, camp, court holding facility, or other correctional facility, whether publicly or privately operated, and court holding facility used for the confinement of adults or of both adults and minors.

California Code of Regulations, Title 15, Crime Prevention and Corrections

CCR Title 15, Crime Prevention and Corrections, provides pertinent provisions related to design, construction, and operation of local detention facilities. Title 15, Division 1, Subchapter 4, provides minimum standards for local detention facilities, and Title 15, Division 3, provides rules and regulations for adult institutions' operations and programs.

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County

Los Angeles County Fire Code

County of Los Angeles Code, Title 32, incorporates by adoption the 2013 CFC. It provides minimum standards to safeguard the public's safety and welfare in relation to fire hazards. Specifically, Title 32 describes all standards and requirements for development pertaining to fire prevention and suppression in unincorporated County areas. These building standards and requirements address, among other requirements, construction materials; building access and evacuation routes; automatic fire extinguisher systems; standards for multifamily housing and commercial/retail land uses; site access/fire lanes; hydrants; water availability; and fire flows (pressures). The code also addresses construction in fire hazard areas; the storage, use, handling, and transportation of hazardous materials; and the use of equipment and activities involving fire.

County of Los Angeles General Plan

The Los Angeles County Board of Supervisors approved the General Plan Update in March 2015. The Public Services and Facilities Element of the General Plan 2035 promotes the orderly and efficient planning of public services and facilities. This element calls for effective service and facilities planning and maintenance and coordination of land use and school and library facilities and planning. The Safety Element sets goals and policies to reduce the demand for fire and police protection services and adequate sheriff and fire services for emergency response.

City

City of Los Angeles General Plan

The City of Los Angeles General Plan includes the City's goals, objectives, and policies for the natural environment, public health and safety, active living, physical mobility, municipal services and facilities, economic development and vitality, and physical development. When it was adopted in 1996, the safety element replaced the previously adopted safety element, fire protection and prevention element, and seismic safety element. No performance objective for fire protection is provided in the City's safety element. Instead, it states broad goals, objectives, policies, and programs to reflect the comprehensive scope of the Emergency Operations Organization (EOO), which addresses the issue of protection of its people from unreasonable risks associated with natural disasters such as fires, floods, and earthquakes. The EOO is the City agency that implements the safety element. All City emergency preparedness, response, and recovery programs are integrated into EOO operations and are reviewed and revised continuously. The EOO is an operational department of the City pursuant to City Administrative Code, Division 8, Chapter 3. It is a "department without walls" that includes all agencies of the City's government. The Emergency Operations Board supervises the EOO (i.e., City) emergency preparedness, response, and recovery. It consists of the heads of the City's critical emergency operations agencies, such as public works, fire, and police departments.

Municipal Code

The 2013 CFC and the 2012 version of the International Fire Code are adopted by reference with specified exceptions, modifications, and additions as the City of Los Angeles Fire Code, Chapter V, Article 7, of the City's municipal code.

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Existing Conditions

Fire Protection and Emergency Services

The Project Site is in the service area of the LAFD, which is a first responder to the Project Site. The nearest LAFD station from the Project Site is Fire Station 4 at 450 East Temple Street, approximately 0.6 mile to the south.

Fire Station 4 currently has average response times of 5 minutes and 12 seconds for 3,739 emergency medicine services (EMS) incidents and 5 minutes and 12 seconds for 635 non-EMS incidents, averaged from data collected from January 2015 to September 2015 (LAFD 2015). The response times combine the average turnout time and travel time, where turnout time refers to the time interval between the activation of station alerting devices to when first responders put on their personal protection equipment and are aboard apparatus and enroute (wheels rolling). The travel time is the time interval that begins when the first unit starts out to the incident and ends upon arrival of any of the units on scene. The actual travel times are impacted by many factors, such as traffic, topography, road width, public events, and unspecified incident locations.

The Project Site is in the 90012 zip code, and the other fire stations serving the 90012 zip code are Fire Stations 3 at 108 North Fremont Avenue, Fire Station 9 at 430 East 7th Street, and Fire Station 20 at 2144 West Sunset Boulevard.

Wildfire Hazard Zones

The nearest Very High Fire Hazard Severity Zone to the site mapped by the California Department of Forestry and Fire Prevention is about 0.5 mile to the north, north of North Broadway (CAL FIRE 2011).

Hospital Services

According to the California Office of Statewide Health Planning and Development, there are 28 hospitals and medical facilities in the City of Los Angeles, and the following describes some nearby hospitals and major hospitals in the City.

Los Angeles County + University of Southern California (LAC + USC) Medical Center. The 600-bed LAC + USC Medical Center at 1983 Marengo Street, approximately 1.2 miles to the east, is one of the largest public hospitals in the country. Through its affiliations with USC's Keck School of Medicine and the Los Angeles County College of Nursing and Allied Health, it is one of the premier academic teaching hospitals in the nation and one of the state's leading hospitals for training health professionals. LAC+USC operates special units that serve patients from throughout Southern California, including a Burn Center, a Level III Neonatal Intensive Care Unit, and a Level-One Trauma Center for the most severe injuries. LAC+USC is home to the Rand Schrader HIV/AIDS Clinic; the Violence Intervention Program that offers medical, mental health, protective, and social services to over 20,000 victims of family violence and sexual assault each year; and a renowned medical clinic for children at risk for or already in foster care.

Good Samaritan Hospital. This hospital has 408 beds and is affiliated with both USC and UCLA Schools of Medicine. Located at 1225 Wilshire Boulevard, it includes the Heart & Vascular Center, Good Samaritan

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Hospital Orthopaedic Center, Tertiary Retinal Surgery, Pancreatico-Biliary Program, Transfusion-Free Medicine & Surgery Center, and the Davajan-Cabal Center for Perinatal Medicine. Each year, Good Samaritan Hospital admits approximately 12,500 patients (excluding newborns) and handles more than 74,000 outpatient visits. More than 3,400 deliveries and 6,500 surgeries are performed annually in 18 surgical suites.

Cedars-Sinai Medical Center. This facility is a nonprofit academic medical center with 886 licensed beds, 2,100 physicians, 2,800 nurses, and thousands of other health-care professionals and staff at 8700 Beverly Boulevard in Los Angeles. Clinical programs range from primary care for preventing, diagnosing, and treating common conditions to specialized treatments for rare, complex, and advanced illnesses. Cedars-Sinai is a leader in the clinical care and research of heart disease, cancer, and brain disorders, among other areas.

Ronald Reagan UCLA Medical Center. This hospital is on the UCLA campus in Westwood. UCLA Medical Center has research centers covering nearly all major specialties of medicine and nursing as well as dentistry, and it is the primary teaching hospital for the David Geffen School of Medicine at UCLA and the UCLA School of Nursing. The hospital's emergency department is certified as a level I trauma center for adults and pediatrics. It provides medical care with a wide-reaching system of primary-care and specialty-care offices throughout the greater Los Angeles region. UCLA Medical Center is a constituent part of the UCLA Health System, a comprehensive consortium of research hospitals and medical institutes affiliated with UCLA that includes: Ronald Reagan UCLA Medical Center; UCLA Medical Center, Santa Monica; Resnick Neuropsychiatric Hospital at UCLA; and Mattel Children's Hospital UCLA.

Spring Street Parking Structure Site (Option 1)

Fire Protection and Emergency Services

As with the Project Site, the SSPS Site is in the service area of the LAFD. The first responding fire station from the SSPS Site is Fire Station 1 at 2230 Pasadena Avenue. From January 2016 to March 2016, Fire Station 1 had average response times of approximately 6 minutes and 13 seconds for 686 EMS incidents and 6 minutes and 3 seconds for 167 non-EMS incidents.

Wildfire Hazard Zones

The nearest Very High Fire Hazard Severity Zone to the site mapped by the California Department of Forestry and Fire Prevention is about 0.5 mile to the north, north of SR-110/I-110 freeway (CAL FIRE 2011).

Hospital Services

The SSPS Site is approximately 0.3 mile from the Project Site and is served by the same hospital facilities that serve the Project Site.

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Vignes Lot (Option 2)

Fire Protection and Emergency Services

As with the Project Site, the Vignes Lot is in the service area of the LAFD. The nearest LAFD station from the Vignes Lot is Fire Station 4 at 450 East Temple Street, approximately 0.6 mile to the south. Fire Station 4 currently has average response times of 5 minutes and 12 seconds for 3,739 EMS incidents and 5 minutes and 12 seconds for 635 non-EMS incidents, averaged from data collected from January 2015 to September 2015 (LAFD 2015).

Wildfire Hazard Zones

The nearest Very High Fire Hazard Severity Zone to the Vignes Lot mapped by the California Department of Forestry and Fire Prevention is about 0.5 mile to the north, north of North Broadway (CAL FIRE 2011).

Hospital Services

The Vignes Lot is approximately 200 feet from the Project Site and is served by the same hospital facilities that serve the Project Site.

5.11.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- PS-1 Result in a substantial adverse physical impact associated with the provisions 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 services.

5.11.1.3 PLANS, PROGRAMS, AND POLICIES

Regulatory Requirements

- RR PS-1 The Proposed Project will be designed and constructed in accordance with the County of Los Angeles Fire Code (Los Angeles County Code, Title 32), which incorporates by adoption the California Fire Code, and the regulations of the Los Angeles County Fire Department, which include standards for building construction that would reduce the creation of fire hazards and facilitate emergency response.
- RR PS-2 The Proposed Project will be designed, constructed, and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections), including but not limited to Title 15, Division 1, Chapter 1, Subchapter 4, Minimum Standards for Local Detention Facilities; Title 24, Part 2, Section 1231, Minimum Standards for Adult Detention Facilities; and other applicable state and federal requirements.

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5.11.1.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the NOP disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-1: The Proposed Project would not result in additional demands for fire protection facilities and personnel that would adversely impact the Los Angeles Fire Department's ability to provide adequate service, or additional demands on other public services such as hospitals. [Threshold PS-1]

Impact Analysis:

Short-Term Construction Impacts

During construction, the presence of heavy construction equipment and flammable and combustible materials could create a potential demand for fire protection services and emergency medical services. However, the required compliance with CFC Chapter 33, Fire Safety During Construction and Demolition, which has been incorporated into the County's Fire Code (i.e., RR PS-1), would ensure that impacts are not significant. CFC Chapter 33 prescribes minimum safeguards to prevent fire and provide reasonable safety to life and property. Building plans would be reviewed and structures inspected by LACFD and the Los Angeles County Building and Safety Department for compliance with applicable standards for ingress/egress, fire flow, fire sprinkler systems, fire hydrants, driveway widths and turning radii, and other pertinent requirements. These standards specify site design and building material and construction methods that would reduce the demand for fire protection services and facilitate emergency response and evacuation.

It is also anticipated that construction staging would occur on the Project Site, and any street or lane closure during construction would be temporary. Moreover, construction-related traffic volumes would not result in substantial traffic impacts, as discussed in Section 5.12, *Traffic and Transportation*, of this EIR. Therefore, implementation of the Proposed Project would not obstruct or impede travel times for the fire department/emergency medical services or result in traffic pattern changes to the area circulation system.

Additionally, construction workers would likely be accommodated from the available local unemployed labor force without resulting in substantial influx of labor force into the LAFD's service area. The City of Los Angeles has an unemployment rate of 5.5 percent and the County has an unemployment rate of 5.2 percent as of July 2017 (EDD 2017), therefore, new construction hires could be filled by the available unemployed local labor force of 110,600 persons in the City of Los Angeles and the unemployed labor force from other areas in Los Angeles County. No substantial increase in short-term fire protection services demands would occur. Similarly, as no substantial influx of labor force is anticipated, it is anticipated that the local construction employment force is already being served by the area hospital/medical services. Therefore, no additional services demands would be created. The existing medical or emergency services and the LAFD would continue to serve the Project Site during construction.

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Compliance with the existing fire codes and standard fire safety practices (i.e., RR PS-1) would ensure that less than significant short-term construction impacts occur related to fire protection service and emergency medical services. Potential impacts to hospital/medical services would be less than significant.

Long-Term Operational Impacts

The Proposed Project would increase the total building area from 1,018,843 square feet to up to 2.4 million square feet and move some existing staff from the TTCF to the CCTF. Project implementation would increase the number of staff per shift by 23 in the early morning shift, decrease staff by 92 in the AM shift, and increase staff by 121 in the PM shift. However, as stated above, the City of Los Angeles has an unemployment rate of 5.5 percent with available unemployed local labor force of 110,600 persons as of July 2017 (EDD 2017). The County has an unemployment rate of 4.1 percent as of April 2017. Therefore, it is anticipated that the new staffing needs could be filled by the local employment labor force or from existing LASD / County Health Agency staff without resulting in growth inducing impacts to increase population in the LAFD's fire protection service boundaries. Additionally, the Proposed Project would decrease the number of beds by 1,223, from 5,108 beds (original state-rated capacity) to 3,885. The Proposed Project would comply with the applicable CFC to avoid structural fire hazards. The LACFD and SFM would review and approve all building plans and inspect for compliance with fire safety regulations prior to building occupancy. The CCTF would improve the older electrical system and fire prevention features of the existing MCJ facilities, reducing potential fire safety hazards.

The Proposed Project would also be required to be constructed and operated with the security and safety provisions for a detention facility (i.e., RR PS-2). As required under RR PS-2, in CCR Title 15, Section 1032, Fire Suppression Preplanning, the County is required to consult with the local fire department with jurisdiction over the CCTF, with the SFM, or both, in developing a plan for fire suppression that includes, but is not limited to: (a) a fire suppression preplan developed with the local fire department to be included as part of the policy and procedures manual (15 CCR § 1029); (b) regular fire prevention inspections by facility staff on a monthly basis with two-year retention of the inspection record; (c) fire prevention inspections as required by Health and Safety Code Sections 13146.1(a) and (b), which require inspections at least once every two years; (d) an evacuation plan; and (e) a plan for the emergency housing of inmate-patients in the case of fire. CCR Title 15 (§ 1325, Fire Safety Plan) further requires the County to consult with the local fire department or the SFM to develop a plan for fire safety that includes, but is not limited to: (a) a fire prevention plan to be included as part of the manual of policy and procedures; (b) monthly fire and life safety inspections by facility staff with two-year retention of the inspection record; (c) fire prevention inspections as required by Health and Safety Code Sections 13146.1(a) and (b); (d) an evacuation plan; (e) documented fire drills not less often than quarterly; (f) a written plan for the emergency housing of minors in the case of fire; and (g) development of a fire suppression preplan in cooperation with the local fire department. Also required under RR PS-2 is a manual of policy and procedures for the CCTF that addresses all applicable CCR Title 15 and Title 24 regulations and is comprehensively reviewed and updated at least every two years. The emergency procedures would include: (a) fire suppression preplan (b) escape, disturbances, and the taking of hostages; (c) civil disturbance; (d) natural disasters; (e) periodic testing of emergency equipment; and (f) storage, issue, and use of weapons, ammunition, chemical agents, and related security devices.

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There are three LAFD fire stations within 1.5 miles from Project Site (LAFD Stations #3, #4, and #9), and the CCTF would be equipped with a fire sprinkler system and alarms for additional fire protection. The LAFD currently provides adequate fire protection service by arriving at incident locations in an average of 5 minutes and 12 minutes, although the actual response times are affected by factors such as traffic, topography, road width, public events, and unspecified incident locations. In addition, the Proposed Project would provide adequate emergency vehicle access. Considering that the Project Site is in a highly urbanized area with easy access to fire hydrants and streets and is a short distance (0.6 mile) from the nearest fire station with manageable traffic conditions, fire service would not be negatively affected. Moreover, the Project Site is already being served by LAFD. Even with additional building area, the improved sprinkler and prevention features of modern buildings would likely reduce the fire hazards risk compared to the existing, outdated buildings. The CCTF also would not involve the use, manufacturing, or storage of hazardous materials other than necessary for janitorial and bus and vehicle maintenance purposes, that would be stored, used, and disposed in accordance with applicable federal, state, and regional regulations. Therefore, although the number of employees and building square footage would increase, the overall services demands for LAFD would not change substantially from the existing conditions, and the Proposed Project would not necessitate the construction or expansion of fire facilities.

Additionally, the CCTF would provide comprehensive onsite treatment for male and female inmate-patients with mental health, medical, substance use, and co-occurring disorder needs. Therefore, the Proposed Project would have beneficial impact on the local hospitals by potentially reducing the number of inmate-patients to be transferred and serviced by the local hospital system, therefore, potentially reducing future local hospital demands by providing better treatment care for inmate-patients with medical and mental illness or substance use disorders. Inmate-patients that require a higher level of medical or mental health care would continue to be served by an offsite contract provider facility and would not create additional demands for medical services. Moreover, operation of the CCTF is subject to inspections by the Board of the State and Community Corrections, the Los Angeles County Department of Public Health, LAFD and the SFM. Regular review of the site conditions and operations would further prevent the creation of fire hazards and other health safety hazards at the facility. Fire protection, emergency, and hospital services impacts would not be significant.

Spring Street Parking Structure Site (Option 1)

Short-Term Construction Impacts

During construction, the presence of heavy construction equipment and flammable and combustible materials could create a potential demand for fire protection services. However, as with the CCTF construction, the required compliance with RR PS-1 would ensure that fire protection impacts during construction are not significant. The CFC provides provisions for adequate ingress/egress access, fire flow, fire hydrants, driveway widths and turning radii, and construction methods that would reduce the demand for fire protection services. It is also anticipated that the construction staging areas would be contained within the SSPS Site, and any street or lane closure during construction would be temporary. Moreover, construction-related traffic volumes would not result in substantial traffic impacts, as discussed in Section 5.12, *Traffic and Transportation*, of this EIR. Therefore, development of the SSPS Site would not substantially obstruct or

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impede travel times for the fire department or result in traffic pattern changes to the area circulation system. The temporary construction workers would likely be accommodated locally, without requiring temporary worker relocation from other areas that could have a growth-inducing impact and require additional permanent fire services or facilities.

The local construction employment force is already being served by the area hospital/medical services, and no additional services demands would be created. The existing medical or emergency services would continue to serve the SSPS Site during construction. Compliance with RR PS-1 would ensure that less than significant short-term construction impacts occur related to fire protection service and emergency medical services. Hospital services impacts would not be significant.

Long-Term Operational Impacts

The SSPS would be designed to comply with the CFC to avoid structural fire hazards. The LACFD and SFM would review and approve all building plans and inspect for compliance with fire safety regulations prior to building completion. This site currently provides 255 surface parking stalls, and the development of a parking structure with up to 1,500 spaces would intensify its use. However, as discussed in EIR Section 5.12, *Transportation and Traffic*, the new parking structure would not result in significant traffic impacts to the area roadway system. Therefore, it would not adversely affect LAFD's ability to provide adequate fire protection services.

The LAFD currently provides adequate fire protection service. The first responder station for the SSPS Site is Fire Station No. 1 at 2230 Pasadena Avenue. There are also three other LAFD fire stations within 1.5 miles of Project Site (i.e., Station No. 3, Station No. 4, and Station No. 9). The new parking structure would be equipped with a fire sprinkler system and alarms for additional fire protection.

In addition, the SSPS would provide adequate emergency vehicle access to be reviewed and approved by the LACFD and LAFD. The SSPS Site is in a highly urbanized area with easy access to fire hydrants and streets, and there are four fire stations within a 1.5-mile radius. Therefore, no additional fire facilities are necessary to provide adequate fire protection service to the SSPS Site. The new parking structure would not involve the use, manufacturing, or storage of hazardous materials other than limited quantities used for janitorial purposes.

Therefore, the overall services demands for LAFD would not change substantially from the existing conditions, and the Proposed Project would not necessitate the construction or expansion of fire facilities. Compliance with RR PS-1 would ensure that less than significant short-term construction impacts occur related to fire protection service and emergency medical services. Hospital services impacts would not be significant.

Vignes Lot (Option 2)

Short-Term Construction Impacts

During construction, the presence of heavy construction equipment and flammable and combustible materials could create a potential demand for fire protection services. However, as with the CCTF

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construction, the required compliance with RR PS-1 would ensure that fire protection impacts during construction are not significant. The CFC provides provisions for adequate ingress/egress access, fire flow, fire sprinkler systems, fire hydrants, driveway widths and turning radii, and construction methods that would reduce the demand for fire protection services. It is also anticipated that the construction staging areas would be contained within the Vignes Lot, and any street or lane closure during construction would be temporary. Moreover, construction-related traffic volumes would not result in substantial traffic impacts. Therefore, construction activities at the Vignes Lot would not substantially obstruct or impede travel times for the fire department or result in traffic pattern changes to the area circulation system. The temporary construction workers would likely be accommodated locally, without requiring temporary worker relocation from other areas that could have a growth-inducing impact and require additional permanent fire services or facilities.

The local construction employment force is already being served by the area hospital/medical services, and no additional services demands would be created. The existing medical or emergency services would continue to serve the SSPS Site during construction. Compliance with RR PS-1 would ensure that less than significant short-term construction impacts occur related to fire protection service and emergency medical services. Hospital services impacts would not be significant.

Long-Term Operational Impacts

The Vignes Lot parking structure would be designed to comply with the CFC to avoid structural fire hazards. The LACFD and SFM would review and approve all building plans and inspect for compliance with fire safety regulations prior to building completion. This site currently is currently vacant, and the development of a parking structure with up to 3,000 spaces would intensify its use. However, the new parking structure would not result in significant traffic impacts to the area roadway system with implementation of the recommended mitigation measures. Therefore, it would not adversely affect LAFD's ability to provide adequate fire protection services.

The LAFD currently provides adequate fire protection service. The nearest LAFD station from the Vignes Lot is Fire Station 4 at 450 East Temple Street, approximately 0.6 mile to the south. There are also three other LAFD fire stations within 1.5 miles of Project Site (i.e., Station No. 1, Station No. 3, and Station No. 9). The new parking structure would be equipped with a fire sprinkler system and alarms for additional fire protection.

In addition, the Vignes Lot parking structure would provide adequate emergency vehicle access to be reviewed and approved by the LACFD and LAFD. The Vignes Lot is in a highly urbanized area with easy access to fire hydrants and streets, and there are four fire stations within a 1.5-mile radius. Therefore, no additional fire facilities are necessary to provide adequate fire protection service to the Vignes Lot. The new parking structure would not involve the use, manufacturing, or storage of hazardous materials other than limited quantities used for janitorial purposes.

Therefore, the overall services demands for LAFD would not change substantially from the existing conditions, and the Proposed Project would not necessitate the construction or expansion of fire facilities. Impacts related to fire protection, emergency medical services, and hospital services would be less than significant.

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Level of Significance before Mitigation: With implementation of RR PS-1 and RR PS-2, Impact 5.11-1 would be less than significant.

5.11.1.5 CUMULATIVE IMPACTS

The geographic area for cumulative analysis of fire protection services is the service area for LAFD. Development of the CCTF and the SSPS Site or Vignes Lot, combined with other cumulative projects in the area, could slightly increase the demand for fire protection services in the Project Area. However, the Proposed Project involves redevelopment of the existing MCJ facility and would not contribute significantly to cumulative growth, because the existing MCJ facility is already being served by the LAFD and would not increase calls for service. The SSPS Site or Vignes Lot would accommodate parking demands that already exist in the area, and therefore would not create new demands that increase the fire protection service population in the Project Area. The Proposed Project would be constructed in compliance with the CFC and subject to LACFD's review and approval for compliance with all applicable construction- and operational-related fire safety requirements. Other projects in the area that may increase demands for additional LAFD staffing, equipment, and facilities over time would be subject to existing funding mechanisms. There are no specific plans to build a new fire station in the area, and the Proposed Project would not contribute to the need for additional fire service facilities. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities that could which cause adverse physical impacts. The Proposed Project would not have a cumulatively considerable effect on fire protection, emergency medical services, or hospital services.

5.11.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

With implementation of RR PS-1 and RR PS-2, the following impact would be less than significant:

- **Impact 5.11-1** The Proposed Project would not result in additional demands for fire protection facilities and personnel that would adversely impact the Los Angeles Fire Department's ability to provide adequate service, or additional demands on other public services such as hospitals.

5.11.1.7 MITIGATION MEASURES

No mitigation measures have been identified because there were no significant impacts identified under the applicable thresholds.

5.11.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Because no mitigation measures are required, impacts are the same as described in Section 5.11.1.6.

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5.11.2 Police Protection

5.11.2.1 ENVIRONMENTAL SETTING

Regulatory Setting

State

California Building Code

The 2013 California Building Code (24 CCR Part 2) contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. Part 2, Section 1231, Minimum Standards for Adult Detention Facilities, provides minimum standards for local detention facilities. A local detention facility is any city, county, city and county, or regional jail, camp, court holding facility, or other correctional facility, whether publicly or privately operated, and court holding facility used for the confinement of adults or of both adults and minors.

California Code of Regulations, Title 15, Crime Prevention and Corrections

CCR Title 15, Crime Prevention and Corrections, provides pertinent provisions related to design, construction, and operation of local detention facilities. Title 15, Division 1, Subchapter 4, provides minimum standards for local detention facilities, and Title 15, Division 3, provides rules and regulations for adult institutions' operations and programs.

Local

County of Los Angeles General Plan

The Los Angeles County Board of Supervisors approved the General Plan Update in March 2015. The Public Services and Facilities Element of the General Plan 2035 promotes the orderly and efficient planning of public services and facilities. This element calls for effective service and facilities planning and maintenance and coordination of land use and school and library facilities and planning. The Safety Element sets goals and policies to reduce the demand for fire and police protection services and adequate sheriff and fire services for emergency response.

City of Los Angeles General Plan

The City of Los Angeles General Plan includes the City's goals, objectives, and policies for the natural environment, public health and safety, active living, physical mobility, municipal services and facilities, economic development and vitality, and physical development. When it was adopted in 1996, the safety element replaced the previously adopted safety element, fire protection and prevention element, and seismic safety element. No performance objective for fire protection is provided in the City's safety element. Instead, it states broad goals, objectives, policies, and programs to reflect the comprehensive scope of the Emergency Operations Organization (EOO), which addresses the issue of protection of its people from unreasonable risks associated with natural disasters such as fires, floods, and earthquakes. The EOO is the City agency that implements the safety element. All City emergency preparedness, response, and recovery programs are integrated into EOO operations and are reviewed and revised continuously. The EOO is an operational

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department of the City pursuant to City Administrative Code, Division 8, Chapter 3. It is a “department without walls” that includes all agencies of the City’s government. The Emergency Operations Board supervises the EOO (i.e., City) emergency preparedness, response, and recovery. It consists of the heads of the City’s critical emergency operations agencies, such as public works, fire, and police departments.

Existing Conditions

LASD Custody Operations Division staffs the existing MCJ and other LASD correctional facilities, whether they are in incorporated cities or in the unincorporated areas of the County.

Surrounding Community

The community surrounding the Project Site, as with the entire City of Los Angeles, is in the service area of the Los Angeles Police Department (LAPD). The City of Los Angeles is divided into 21 LAPD patrol areas, and the Project Site is in the Central Area, which spans about 4.5 square miles with a population of 40,000. The Central Community Police Station is at 251 East 6th Street, about 1.4 miles southwest of the Project Site. The Central Community Police Station is staffed by approximately 400 sworn and civilian members of the LAPD and is responsible for all police operations in downtown Los Angeles (LAPD 2014).

Spring Street Parking Structure Site (Option 1)

The SSPS Site is in the Central Area service area of LAPD. This site is currently operated by the County as a surface parking lot for County and public use.

Vignes Lot (Option 2)

The Vignes Lot is in the Central Area service area of LAPD. This site is currently vacant.

5.11.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PP-1 Result in a substantial adverse physical impact associated with the provisions 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 services.

5.11.2.3 PLANS, PROGRAMS, AND POLICIES

Project Design Features

PDF PS-1 The CCTF will be designed to incorporate better crime prevention through environmental design (CPTED) features and security technologies than the existing MCJ facility, thereby resulting in improved security for inmate-patients, staff, visitors, and the neighborhood.

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CPTED is a multi-disciplinary approach for deterring criminal behavior through environmental design. CPTED strategies rely upon the ability to influence offender decisions that precede criminal acts by affecting the built, social and administrative environment.

Regulatory Requirements

RR PS-2 The Proposed Project will be designed, constructed, and operated in accordance with pertinent provisions of Title 15 of the California Code of Regulations (Crime Prevention and Corrections), including but not limited to Title 15, Division 1, Chapter 1, Subchapter 4, Minimum Standards for Local Detention Facilities; Title 24, Part 2, Section 1231, Minimum Standards for Adult Detention Facilities; and other applicable state and federal requirements.

5.11.2.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the NOP disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-2: Project development would not increase demands for police protection in the City of Los Angeles Police Department's service area. [Threshold PP-1]

Impact Analysis:

Short-Term Construction Impact

The Project Site is already developed and operates as a County jail facility that is served and staffed by LASD. During construction, the Project Site would continue to be surveilled by LASD and the construction zone would be secured and fenced during construction. The adjacent TTCF would operate normally during construction, and many law enforcement personnel are anticipated on and near the Project Site to further discourage criminal activities. Although the Project Site is in the LAPD's service area, the police protection service within the Project Site is provided by LASD and it would continue to be protected by LASD. There would be less than significant construction-related impacts on police protection services.

Long-Term Operational Impact

LASD would provide police protection to the Project Site. Bauchet Street is currently an open public right-of-way and it is anticipated that its access would be restricted from the public so that any unauthorized activities within the CCTF could be monitored. Therefore, the Proposed Project would improve the surveillance. As the CCTF's design has not yet been finalized, there would be more opportunities for the Proposed Project to incorporate better crime prevention through environmental design (CPTED) features and security technologies than the existing MCJ facility, thereby resulting in improved security for inmate-patients, staff, visitors, and the neighborhood. As stated in PDF PS-1, the Proposed Project would be designed to incorporate CPTED features in final design. CPTED is a multi-disciplinary approach for deterring criminal behavior through environmental design. CPTED strategies rely upon the ability to influence offender decisions that precede criminal acts by affecting the built, social and administrative environment. One of the

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objectives of the Proposed Project is to improve safety of public, staff, and inmate-patients through design and operational best practices that meet Board of State and Community Corrections and applicable correctional standards. The Proposed Project is a consolidated treatment facility serving inmate-patients, rather than a jail intended primarily for incarceration. Therefore, the Project Site would employ slightly more staff than under existing conditions, while reducing the number of beds, and provide improved site security. The increase in medical and mental health staff as well as other custody and support services staff would facilitate appropriate security and support services by LASD in accordance with CCR Title 15 (RR PS-2) and increase the surveillance capacity. The Proposed Project expands the LASD's capacity to serve the County's mental and medical inmate-patients and would not require construction of new or expanded offsite LASD facilities. Less than significant impact to police protection on-site would occur.

LAPD Service Area

The area surrounding the Project Site is under the LAPD's service area and already being served by LAPD. Although the local streets serving the Project Site are under the jurisdiction of LAPD, LASD would be stationed at the Project Site and at the adjacent TTCF during construction and operation of the Proposed Project. Since the Proposed Project is a replacement project with only minimal increases in staffing, the Proposed Project would not increase demands for police protection in LAPD's service area and would not require construction of new or expanded LAPD facilities. Less than significant impacts to police protection off-site would occur.

Spring Street Parking Structure Site (Option 1)

Police protection services for the SSPS Site would be provided by LASD, but the area surrounding the SSPS Site is served by LAPD. The parking structure development itself would not create new demands for police protection services, as it would redistribute and not necessarily create new vehicle and pedestrian activities around the SSPS Site. The parking structure would serve the CCTF staff during phased construction of the CCTF, and other surrounding uses once the CCTF construction is completed. Therefore, it would not increase the demands for police protection in LAPD's service area since the parking structure would serve visitors who are already coming to the area. Therefore, construction of the SSPS would not require construction of new or expanded LAPD facilities and less than significant impacts to police services are anticipated.

Vignes Lot (Option 2)

Police protection services for the Vignes Lot would be provided by LASD, but the area surrounding the Vignes Lot is served by LAPD. The parking structure development itself would not create new demands for police protection services, as it would redistribute and not necessarily create new vehicle and pedestrian activities around the Vignes Lot. The parking structure would serve the CCTF and TTCF staff during construction of the CCTF and long-term operation after project buildout. Therefore, it would not increase the demands for police protection in LAPD's service area since the parking structure would serve visitors who are already coming to the area. Therefore, construction on the Vignes Lot would not require construction of new or expanded LAPD facilities and less than significant impacts to police services are anticipated.

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Level of Significance before Mitigation: With implementation of PDF PS-1 and RR PS-2, Impact 5.11-2 would be less than significant.

5.11.2.5 CUMULATIVE IMPACTS

The geographic area for cumulative analysis of police protection services is the service area for LAPD. However, the Proposed Project would be served by LASD and would not significantly impact the police services of LAPD. LAPD's service area, including areas surrounding the Project Site and the SSPS Site and Vignes Lot, is a fully developed urban area. Implementation of cumulative projects would increase police protection demands in the area. However, the Proposed Project would be served by LASD and not increase population or induce growth within the LAPD's service area. Instead, the Proposed Project would likely improve the overall on- and offsite security of the Project Site. Development at either the Spring Street or Vignes Lot parking structures would not induce growth that would adversely affect the LAPD's ability to provide adequate service. Therefore, no construction or expansion of existing police facilities would be necessary, and there are no lasting physical impacts associated with providing adequate police services to the Proposed Project, individually or cumulatively.

5.11.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

With implementation of PDF PS-1 and RR PS-2, the following impact would be less than significant:

- **Impact 5.11-2** Project development would not increase demands for police protection in the City of Los Angeles Police Department's service area.

5.11.2.7 MITIGATION MEASURES

No mitigation measures are necessary because there were no significant impacts identified under the applicable threshold.

5.11.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Because no mitigation measures are required, impacts are the same as described in Section 5.11.2.6

5.11.3 School Services

5.11.3.1 ENVIRONMENTAL SETTING

Regulatory Setting

There are no relevant programs and regulations applicable to the Proposed Project.

Existing Conditions

MCJ serves an adult population and offers educational services to inmates through the LASD's Education Based Incarceration Bureau, including General Educational Development high-school-equivalency test preparation and a variety of vocational training programs (LASD 2014). The proposed CCTF would not

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house juveniles who may still be enrolled in public schools; juvenile offenders incarcerated by the County are held at three offsite juvenile hall facilities operated by the County Probation Department.¹

Surrounding Community

The Project Site is in the Los Angeles Unified School District (LAUSD) service area, which spans 720 square miles and includes nine cities—including the City of Los Angeles—portions of 23 other cities, and some unincorporated areas of Los Angeles County. LAUSD operates over 1,025 schools, including charter schools—584 elementary schools, 142 intermediate/middle schools, 160 high schools, 37 K–12 schools, 39 continuation schools, and 63 various adult education, special education, and alternative education schools (CDE 2017a). Districtwide enrollment in the 2015–16 school year was 639,337 (CDE 2017a).

The Project Site is in the attendance areas for Ann Elementary School at 126 East Bloom Street in the City of Los Angeles, about 700 feet north of the Project Site, and Nightingale Middle School at 3311 North Figueroa Street in the City of Los Angeles, about 1.4 miles north of the site. The Project Site is not in the attendance area for a specific high school. Portions of the LAUSD are organized into “zones of choice,” and students may choose from one of several high schools in their zone. The Project Site is in an area where two zones overlap, the Belmont Zone and the Northeast Zone. Students in the surrounding neighborhood may choose from 11 high schools in either of the two zones (LAUSD 2014a). The nearest high school to the Project Site is the Ramon Cortines School of Visual and Performing Arts at 450 North Grand Avenue in Los Angeles, about 0.4 mile to the west. The Cortines school offers a comprehensive academic program in addition to programs in dance, music, theater, and visual arts (LAUSD 2014b). The Edward Roybal Learning Center at 1200 West Colton Street in Los Angeles, is located about one mile to the west.

Enrollments during the 2015–16 school year at these four nearest schools were:

- Ann Street Elementary (grades K–5): 107
- Florence Nightingale Middle School (grades 6–8): 723
- Ramon Cortines School of Visual and Performing Arts (grades 9–12): 1,527
- Edward Roybal Learning Center (grades 9–12): 1,107 (CDE 2017)

Spring Street Parking Structure Site (Option 1)

As with the Project Site, the SSPS Site is in the LAUSD service area. This site is currently developed and operated as a County parking lot and does not generate any demand for school services.

Vignes Lot (Option 2)

As with the Project Site, the Vignes Lot is in the LAUSD. This site is currently vacant and does not generate any demand for school services.

¹ Two of the juvenile hall facilities, Nidorf and Central, are in the City of Los Angeles, and the third, Los Padrinis, is in the City of Downey.

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5.11.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

SS-1 Result in a substantial adverse physical impact associated with the provisions 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 school services.

5.11.3.3 PLANS, PROGRAMS, AND POLICIES

Project Design Features

PDF PS-2 The Contractor's Specifications will require that the Proposed Project include space to accommodate general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, a library, and computer labs that will be made available to the inmate-patient population and provided through onsite classrooms, library facilities, and computer labs.

5.11.3.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the NOP disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-3: The Proposed Project would not generate new students who would impact the school enrollment capacities of area schools. [Threshold SS-1]

Impact Analysis:

Short-Term Construction Impact

The construction-related jobs are anticipated to be accommodated by the local employment base, and no relocation of workers would be necessary. Therefore, the Proposed Project would not directly or indirectly generate the need for school services during construction and no impact is anticipated.

Long-Term Operational Impact

The Project Site is already developed as the County's MCJ, and the inmates' educational needs are being provided by LASD. The LASD's Education Based Incarceration Bureau would continue to offer educational services to inmate-patients in the proposed CCTF and would not require services from local school districts. As stated in PDF PS-2, the CCTF would include space to accommodate general education and vocational training classes and would not require construction of any offsite educational facilities—including K-12 school facilities—during construction or operation.

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Impacts to local school facilities are created by growth-inducing projects such as residential development or nonresidential development that provides employment opportunities, which could indirectly result in population growth in the area. The Proposed Project would not result in population growth within the LAUSD service area during construction and operation. The surrounding community is developed with urban uses, and the Proposed Project would be served by the local employment base without creating the need for influx of population from other areas. Therefore, the Proposed Project would not generate new K–12 students demands and would not impact capacities of LAUSD schools in the surrounding community. No impact would occur.

Spring Street Parking Structure Site (Option 1)

The short-term construction-related jobs are anticipated to be accommodated by the local employment base, and no relocation of workers would be necessary for the development of the SSPS. Therefore, construction of a parking structure would not directly or indirectly result in population growth in the area that could create demands for additional school services. No need for additional school services during construction would occur. Project development would not require construction of any educational facilities, including K–12 school facilities, during short-term construction or long-term operation. Once completed, the SSPS would be operated by County staff and would not generate new K–12 students. It would not impact capacities of LAUSD schools in the surrounding community that could result in significant environmental impacts. No impacts to schools are anticipated.

Vignes Lot (Option 2)

The short-term construction-related jobs are anticipated to be accommodated by the local employment base, and no relocation of workers would be necessary for the development of the Vignes Lot. Therefore, construction of a parking structure would not directly or indirectly result in population growth in the area that could create demands for additional school services. No need for additional school services during construction would occur. Project development would not require construction of any educational facilities, including K–12 school facilities, during short-term construction or long-term operation. Once completed, the parking structure would be operated by County staff and would not generate new K–12 students. It would not impact capacities of LAUSD schools in the surrounding community that could result in significant environmental impacts. No impacts to schools are anticipated.

Level of Significance before Mitigation: No impacts related to Impact 5.11-3 would occur.

5.11.3.5 CUMULATIVE IMPACTS

The geographic area for cumulative analysis of school services would be the LAUSD’s student service area. The Proposed Project would not result in individual or cumulative population growth in the area that would generate students to impact the local school capacity. No cumulatively considerable impacts would occur.

5.11.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The following impact would be no impact:

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- **Impact 5.11-3** The Proposed Project would not generate new students who would impact the school enrollment capacities of area schools.

5.11.3.7 MITIGATION MEASURES

No mitigation measures are necessary because there were no significant impacts identified under the applicable threshold.

5.11.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Because no mitigation measures are required, impacts are the same as described in Section 5.11.3.6.

5.11.4 Library Services

5.11.4.1 ENVIRONMENTAL SETTING

Regulatory Setting

There are no relevant programs and regulations applicable to the Proposed Project.

Existing Conditions

The MCJ includes a library and a law library operated by LASD for the use of inmates.

Surrounding Community

The Project Site is in the service area of the City of Los Angeles Public Library (LAPL). The nearest LAPL facility to the Project Site is the Chinatown Library at 639 North Hill Street in Los Angeles, about 0.5 miles to the west (LAPL 2014).

Spring Street Parking Structure Site (Option 1)

The Chinatown Library is approximately 730 feet west of the SSPS Site.

Vignes Lot (Option 2)

The Chinatown Library is approximately 0.5 miles west of the Vignes Lot.

5.11.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- LS-1 Result in a substantial adverse physical impact associated with the provisions 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

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maintain acceptable service ratios, response times or other performance objectives for library services.

5.11.4.3 PLANS, PROGRAMS, AND POLICIES

Project Design Features

PDF PS-2 The Contractor's Specifications will require that the Proposed Project include space to accommodate general education classes, computer training, general and vocational career technical education, career counseling, a learning resource center, a library, and computer labs that will be made available to the inmate-patient population and provided through onsite classrooms, library facilities, and computer labs.

5.11.4.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the NOP disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-4: The Proposed Project would not generate additional population that would increase the demand for local libraries. [Threshold LS-1]

Impact Analysis:

Short-Term Construction Impact

The construction-related jobs are anticipated to be accommodated by the local employment base, and no relocation of workers would be necessary. Therefore, the Proposed Project would not directly or indirectly generate the need for local library services during construction. No impact to libraries would occur.

Long-Term Operational Impact

The proposed CCTF would include a library and law library for use by inmate-patients in accordance with CCR Title 15, as does the existing MCJ. As stated in PDF PS-2, the Contractor's Specifications would require that the Proposed Project include library facilities and computer labs. The increase in staff for the CCTF would be accommodated from the local employment base in Los Angeles or nearby cities. No employees would need to be drawn from other areas, which could induce growth in the area. Therefore, no increased demand for library services would result from the Proposed Project. Project development would not increase demands for library services in LAPL's service area and would not require construction of new or expanded library facilities. Impacts would be less than significant.

Spring Street Parking Structure Site (Option 1)

The SSPS would serve the CCTF development and other existing parking demands in the area. It would not increase demand for library services in LAPL's service area during short-term construction or long-term operation and would not require construction of new or expanded library facilities. No impact would occur.

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Vignes Lot (Option 2)

The Vignes Lot would serve the CCTF development and the existing TTCF. It would not increase demand for library services in LAPL's service area during short-term construction or long-term operation and would not require construction of new or expanded library facilities. No impact would occur.

Level of Significance before Mitigation: Impact 5.11-4 would be less than significant.

5.11.4.5 CUMULATIVE IMPACTS

The geographic area for cumulative analysis of library service is the service area of the LAPL. The Proposed Project would not result in growth that would impact LAPL's service capacity. No cumulatively considerable impacts to libraries would occur.

5.11.4.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The following impact would be no impact:

- **Impact 5.11-4** The Proposed Project would not generate additional population that would increase the demand for local libraries.

5.11.4.7 MITIGATION MEASURES

No mitigation measures are necessary because there were no significant impacts identified under the applicable thresholds.

5.11.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Because no mitigation measures are required, impacts are the same as described in Section 5.11.4.6.

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