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

1. INTRODUCTION

This section analyzes the proposed Project's impacts relative to the fire services and emergency medical services provided by the Consolidated Fire Protection District of Los Angeles County (LACoFD). The Project area is located within the jurisdiction of the County Fire Department, and information contained herein is based on direct consultation with the agency as well as review of the City of Carson General Plan and Municipal Code. The analysis evaluates the impact of the Project relative to existing and projected LACoFD fire protection services and facilities. Also described in this section are the applicable requirements for fire flow, fire and life safety, and emergency access.

2. EXISTING CONDITIONS

a. Regulatory Framework

(1) California Building Code (CBC)

The California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is a compilation of building standards, including fire safety standards for structures. CBC standards are based on building standards that have been adopted by state agencies with changes to address particular California conditions. Typical fire safety requirements of the CBC include the establishment of fire resistance standards for fire doors, building materials, and particular types of construction, and the clearance of debris and vegetation within a prescribed distance from occupied structures. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies.

(2) Standardized Emergency Management System (SEMS)

After the 1991 Oakland fire, the State of California passed Senate Bill 1841 to establish the Standardized Emergency Management System (SEMS), CCR Title 19, which sets forth procedures for managing response to multi-agency and multi-jurisdictional emergencies in California. The legislation mandated that by December 1, 1996, each local jurisdiction, in order to be eligible for any funding of response-related costs under disaster assistance programs, shall

implement the Standardized Emergency Management System and prepare an up-to-date emergency management plan (which includes an emergency evacuation plan).

The County has prepared the Multi-Hazard Functional Plan, which serves as the emergency management plan for the entire County. The plan, revised on February 17, 1998, sets forth procedures and measures for coordination with County agencies in the event of a disaster.

The City of Carson has also prepared a Multi-Hazard Functional Plan for emergency response within the City which complies with State law and the Los Angeles County Emergency Management Plan. As discussed in the Safety Element of the General Plan, the Carson Multi-Hazard Functional Plan identifies areas of potential danger in the City as well as areas for meeting and staging in an emergency event, communications, and emergency evacuation. Emergency shelters, meeting, and staging locations include the City's parks and other large open areas. An Emergency Operation Center (EOC), fully equipped with emergency communication equipment and cooking, showering and sleeping facilities is located within Carson City Hall in the event of a major seismic event or other similar hazard. Additionally, an amateur radio operating system has been implemented Citywide to maintain communications should other systems fail.

The Plan has also identified State Route 91, and Interstates 405, 110, and 710 as potential emergency evacuation routes. Additional routes include arterial streets with right-of-way widths from 80 to 100 feet that form a grid pattern throughout the City at one-half mile intervals. Potential east-west arterial street evacuation routes in the Project area include Lomita Boulevard, Sepulveda Boulevard, 223rd Street, Carson Street, Del Amo Boulevard, Victoria Street, Artesia Boulevard, and Alondra Boulevard. North-south arterial streets in the Project area that could be utilized as evacuation routes include Santa Fe Avenue, Alameda Street, Wilmington Avenue, Avalon Boulevard, Main Street, Figueroa Street and Broadway.

(3) City of Carson General Plan Safety Element

The Safety Element of the City's General Plan specifically addresses the issue of urban fires and establishes policies to minimize the public hazard from fire emergencies. To support this goal, the following policies have been set forth:

- Coordinate with the Fire Department to provide fire and paramedic service at standard levels of service;

- Continue to involve the Fire Department in reviewing and making recommendations on projects during the environmental, site planning and building plan review processes;

- Continue to work with the Fire Department to ensure their capability to address fires and other emergencies at refineries, tank farms, and other heavy industrial facilities within the City;

- Work with the City's Public Information Office and LACoFD to promote and expand public education programs and seminars on safety and emergency response for those areas surrounding refineries, tank farms, and other heavy industrial facilities;

- Continue to enforce current regulations which relate to safety from fire, particularly in critical and high occupancy facilities; and

- Work with the City's Public Information Office and the Fire Department to continue to promote and enhance public outreach programs which educate the community about the importance of fire resistant building materials, promote the use of smoke alarms/detectors, and highlight other ways to reduce the public hazard from fire emergencies.

(4) City of Carson Municipal Code

The City of Carson has adopted the Los Angeles County Fire Code (Title 32) as the Fire Prevention Code for the City of Carson. The City has also adopted the Los Angeles County Building Code (Title 26) as the Building Code for the City of Carson. The Los Angeles County Fire Code and the County Building Code establish requirements and regulations for the design, construction, and provision of fire protection facilities and equipment related to new development within the LACoFD's jurisdiction.

b. Existing Conditions

The LACoFD provides fire protection services to over 3.9 million residents throughout the unincorporated areas of the County and 57 District cities. The LACoFD is divided into three Regional Operations Bureaus: North, Central, and East. The Operations Bureaus are subdivided into 9 geographical divisions consisting of 20 battalions, 159 fire stations, and 163 engine companies. Currently, the LACoFD has a staff of approximately 4,355 persons, including 567 firefighters and 603 firefighter paramedics.[120] The LACoFD service area covers 2,297 square miles and approximately 1,163,467 households. In addition to fire protection services, the LACoFD also provides special operations services including fire prevention, hazardous materials, emergency medical services, lifeguards, forestry, urban search and rescue, and terrorism response.

[120] *2004 Statistical Summary, Los Angeles County Fire Department.*

The Project site is located within Division I of the Central Region in the Battalion 7 service area. There are six primary fire stations that provide both fire and emergency medical service to the City of Carson, with four of the stations located within City boundaries. In addition to these fire stations, there is a Fire Prevention Office located at Carson City Hall. Each of the primary fire stations has established an expanded response matrix for its individual jurisdiction, which increases the resources available to help a fire station respond to an emergency. These include additional engine companies, truck companies, paramedic units and hospitals. As 9-1-1 emergency calls are processed, a computer dispatching system selects from this matrix to provide the closest available unit that can meet the emergency need.[121] Two paramedic units are located within the City and provide service to Carson. Auxiliary paramedic definitive care is provided by units located nearby in Lomita, Lawndale, Hawthorne, Lakewood, Paramount and Rolling Hills. In addition, the LACoFD has three helicopters which have the ability to provide air ambulance and paramedic service to the area. American Medical Response, with units based at East 223rd Street and Lucerne Avenue, provides ambulance service for the City of Carson.

The General Plan Safety Element identifies the average emergency response times in the City of Carson. As shown in Table 60 on page 459, during the period in which the EIR for the City of Carson General Plan was prepared, approximately 1,047 medical emergency responses occurred throughout the city, with an average response time of 4.7 minutes. Approximately 81 fire incidents occurred throughout the City, with an average response time of 5.0 minutes. As shown in Table 61 on page 459, the average response time for Fire Station No. 36 is less than the Citywide average response time, while the average response time for Fire Station No. 116 is greater than the Citywide average.

The nearest response unit to the Project Site is Fire Station No. 36, located at 127 West 223rd Street, approximately 1.5 miles south of Project site's nearest ingress point at Lenardo Drive and Main Street. Other response units in the Project area include Station No. 10 at 1860 East Del Amo Boulevard and Station No. 116 at 755 Victoria Street. The latter two stations are located approximately 2.4 miles from the Project site. In addition to existing stations, the LACoFD "Five-year Fire Station Plan" identifies a proposed station near the I-405/110 Freeway interchange. A future LACoFD fire station in the proximity of the I-405/110 Freeway would be located north of the Project site and particularly accessible to the Project's site primary entrances. Table 61 contains a list of the equipment, distance, response times, and staffing for the above-listed response units. However, since staffing at any single fire station remains constant, a major incident, such as a structure fire, would require auxiliary service from multiple response units not identified in this section.

[121] *Safety Element of the City of Carson General Plan (October 11, 2004).*

Table 60

LACoFD Average Response Times, City of Carson

Emergency	Incidents	Average Response Time
Emergency Medical Services	1,047	4.7 minutes
Fire	81	5.0 minutes
Hazardous Materials	78	5.0 minutes
Other	377	5.4 minutes
Total	1,583	4.9 minutes

Source: City of Carson General Plan Safety Element, October 11, 2004.

Table 61

LACoFD Fire Equipment and Response Times

Equipment	Distance [a]	Time [a]	Staffing
Engines 36 and 236	2.1 miles	4.3 minutes	8
Squad 36	2.1 miles	4.3 minutes	2
Engine 10	2.4 miles	4.8 minutes	4
Engine 116	2.4 miles	5.8 minutes	3
Squad 116	2.4 miles	5.8 minutes	2
Truck 116	2.4 miles	5.8 minutes	4

[a] *To the middle of the Project site via interior driveways.*

Source: Letter sent to Ron Winkler, Economic Development Department General Manager, City of Carson from Chief Leininger, Forestry Division, Los Angeles County Fire Department, dated August 2, 2005

3. PROJECT IMPACTS

a. Methodology

The impact of a project on fire services is partially determined by a project's compliance with the access and fire flow requirements of the Fire Code. In order to determine the impact of a project relative to the access, fire flow, and hydrant requirements of the Fire Code, the compliance of the project with these requirements is evaluated. The distance of the Project to the nearest fire station and the capability of existing facilities to serve the Project site is also evaluated. Finally, any physical constraints that preclude the attainment of the access and fire flow requirements of the Fire Code are also evaluated.

b. Significance Thresholds

For the purpose of this analysis, impacts with regard to fire services are considered significant if the Project would:

- Generate a demand for additional fire protection service that exceeds the staff and equipment capabilities of the station (s) to serve the Project site;
- Require the addition of new fire facilities or the expansion, consolidation, or relocation of an existing station to maintain service; or
- Not comply with all applicable code and ordinance requirements for construction, fire safety facilities, fire flow, fire hydrants, and access.

c. Project Impacts

(1) Project Design Features

The Project would be developed with a combination of commercial and residential buildings. Residential buildings would be limited to 75 feet in height. The largest portion of the commercial buildings would be limited to 32 feet in height, with incremental increases in height to 52 feet at limited locations. The theater and hotel could have base heights up to 60 feet and 75 feet, respectively. The Project site would be accessible to fire services along its Main Street and Del Amo Boulevard frontages. The Project would feature 10-foot setbacks from Main Street and Del Amo Boulevard, north of Del Amo Boulevard, and 20-foot setbacks along Main Street and Del Amo Boulevard, south of Del Amo Boulevard.

South of Del Amo Boulevard within Districts 1 and 2, Stamps Drive and Lenardo Drive would form the Project's interior street network. Primary access to the interior street network would be via the intersections of Stamps Drive and Del Amo Boulevard and the intersection of Lenardo Drive and Main Street, which are located in the northern portion of the Project site. The Project site would also be accessible from the I-405 Freeway/Avalon Boulevard interchange and Avalon Boulevard, via Lenardo Drive at the south end of the Project site. Due to the intervening Torrance Channel, no access from Main Street at the south end of the Project site would be available.

Primary access into the Project site north of Del Amo Boulevard would be via a driveway on Del Amo Boulevard and via the Del Amo Boulevard and Stamps Drive intersection. No access to Main Street would be provided

The proposed Project would comply with all applicable standards and regulations with regard to fire prevention and protection including access, fire flow, and location of fire hydrants. General development requirements would include adequate ingress and egress points; compliance with ordinances pertaining to fire safety during the Project's construction phase; compliance with LACoFD requirements pertinent to street widths, roadway surfacing, and accessibility of fire apparatus to proposed structures. Access, fire flows requirements, and hydrant placement would meet fire code standards and would be addressed during the Project's tract map approval. Site-specific fire and life safety requirements for multiple family dwellings and commercial uses, including the installation of fire suppression equipment including an automatic fire suppression system, fire alarm system, and evacuation life safety system; the use of specified building materials, and the design of structures according to fire safety standards, would be incorporated into the Project and addressed during LACoFD review of detailed building plans.

The proposed Project would fund its fair share for new fire service facilities. In addition, with the occupancy of the proposed development, the Project would generate annually recurring revenue to the Los Angeles County General Fund in the form of taxes and other miscellaneous charges (e.g., sales tax, property tax, etc.) and, to a lesser extent, via revenues generated by a direct property tax assessment. A portion of General Fund revenue may be used at the County's discretion to address costs associated with demand for LACoFD operations and staffing. The allocation of such revenue to a specific municipal service is determined through the County's budgeting process by the County Board of Supervisors.

(2) Project Impacts

(a) Construction

During the Project's construction phase, construction activities would temporarily increase the demand on fire services. Traffic associated with construction activities would potentially affect fire access on the Project site and adjacent streets. The effect of construction activities and traffic relative to emergency access is evaluated in Section IV.C, Traffic and Circulation. As described therein, the Project would provide a Worksite Traffic Control Plan (WTCP) to the City and appropriate police and fire service prior to the start of any construction work phase. The WTCP would include the scheduling and location of any roadway closures, traffic detours, haul routes, protective devices, and warning signs, for the purpose of minimizing impediments or interference with emergency vehicles.

Construction activities would also increase demand for LACoFD services. Construction activities may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources. Heat or fire sources may include machinery and equipment sparking, exposed electrical lines, welding activities, chemical reactions in

combustible materials and coatings, and lighted cigarettes. The Project would comply with OSHA and Fire and Building Codes regarding site safety. In addition, the existing chain-link fence on the perimeter of the Project site would remain in place throughout construction reducing the potential for hazards associated with trespassing and vandalism. With the implementation of code-required safety features during Project construction, any additional demand on fire services would not exceed the current capabilities of the LACoFD, and impacts during Project construction would be less than significant.

(b) Operation

The occupancy of the Project would increase the demand for LACoFD staffing, equipment, and facilities. The residential component of the proposed Project would include 1,550 residential units that would conservatively generate approximately 6,969 new residents. In addition the Project's commercial component would include restaurants, theaters, and a hotel, which would increase demand for fire services, including occupancy inspections and emergency calls.

Fire Station No. 36 is the current closest station to the Project site and therefore, is likely to provide first response for emergency incidents. Emergency access to the Project's residential uses would be provided primarily via Main Street and Del Amo Boulevard, since these uses are located in the Project's northerly sector. From Fire Station No. 36, the Project's internal streets south of Del Amo Boulevard, would be accessed via Main Street. North of Del Amo Boulevard, internal streets would be accessed via the Del Amo Boulevard and Stamps Drive intersection and a secondary driveway on the north side of Del Amo Boulevard. All project roadways would be constructed to meet all Fire and Building Code requirements (i.e., minimum street width, turning radii, slope, etc.) of the LACoFD.

Emergency access to the Project's commercial components would be via all of the Project's access points, including, but not limited to, Lenardo Drive, via Avalon Boulevard. Although commercial uses are located throughout the Project site, including north of Del Amo Boulevard, commercial uses dominate the southerly sector of the Project site. Since these uses do not have direct access to Main Street, they must be accessed by Fire Station No. 36 near the northerly portion of the Project site. The south and westerly boundaries of much of the commercial zone are bounded by the Torrance Lateral channel and are not immediately accessible to Main Street, the primary access route for Station No. 36. As such, the Station 36 response times, shown in Table 61, are not necessarily indicative of Project-specific response times since these times would be dependent on the location of the emergency incident within the Project site and fire apparatus accessibility to that location. According to the LACoFD, the

Project's access plan would not facilitate optimum response to all areas of the Project site, since Fire Station 36 is located to the south of the Project Site.[122]

As stated by the LACoFD, "additional manpower, equipment, and facilities will be needed to serve the development." According to the LACoFD letter, limited tax revenues have restricted the Fire Department's ability to meet new growth needs. The LACoFD states: "Although general plans for upgrading fire protection in this area have been developed, the Fire Department will not be able to implement these plans without specific provisions for the necessary man power, equipment, and facilities." The LACoFD also requests mitigation of "this problem" (the upgrading of facilities) prior to Project approval.[123] Since the Project would generate additional demand that exceeds the staff and equipment capabilities of the LACoFD, the impact of the Project relative to fire services is concluded to be significant.

The Project would pay a fair share contribution for new fire facilities and, with the occupancy of the proposed development, the Project would generate annually recurring revenue to the Los Angeles County General Fund in the form of taxes and other miscellaneous charges (e.g., sales tax, property tax, etc.). A portion of such revenue, including direct assessments that are received by the LACoFD, would be used to address costs associated with demand for LACoFD operations and staffing.

The Project would also comply with the applicable requirements of the County Fire and Building Codes regarding site access, fire hydrant spacing, water-storage, building materials, construction standards, and fire flow. It is forecasted that the Project's proposed water system would deliver a fire flow of up to 5,000 gpm at 20 pounds per square inch (psi) for the required duration, in compliance with LACoFD requirements. The Project would also be equipped with design features and fire suppression equipment including an automatic sprinkler system, fire alarm system, and evacuation life safety system. These systems would slow the spread of fire and would reduce demand for LACoFD services. In addition, development plans would be reviewed by the LACoFD prior to the issuance of building permits to ensure that the Project would be in compliance with all applicable fire codes and regulations. With the implementation of the Project's design features, including provision of fire alarm, suppression, and response systems; the payment of fair share fees; and the ongoing payment of property tax direct assessments for fire services during operation, Project impacts relative to LACoFD system capacity are concluded to be less than significant.

---

[122] *Letter sent to Ron Winkler, Economic Development Department General Manager, City of Carson from Chief Leininger, Forestry Division, Prevention Services Bureau, County Fire Department , dated August 2, 2005*

[123] *Ibid.*

4. MITIGATION MEASURES

The Project's potentially significant demand on existing fire service facilities would be reduced to a less than significant level through the implementation of all applicable fire code regulations and mandatory fee payments. To ensure that all applicable fire code regulations, mandatory fee payments and recommended fire safety measures are incorporated into the Project, the following mitigation measures are recommended:

Mitigation Measure I.1-1: Prior to construction, the Applicant shall submit buildings plans to the Los Angeles County Fire Department (LACoFD) for review. Based on such plan check, any additional fire safety recommendations shall be implemented to the satisfaction of the LACoFD.

Mitigation Measure I.1-2: The Applicant shall provide adequate ingress/egress access points for emergency response to the satisfaction of the LACoFD.

Mitigation Measure I.1-3: The Applicant shall comply with all applicable fire code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants as required by the LACoFD.

Mitigation Measure I.1-4: Every building shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the width prescribed by the LACoFD. The roadway shall extend to within 150 feet of all portions of exterior building walls when measured by an unobstructed route around the exterior of the building.

Mitigation Measure I.1-5: Requirements for access, fire flows, and hydrants, shall be addressed during the City's subdivision tentative map stage.

Mitigation Measure I.1-6: Fire sprinkler systems shall be installed in all residential and commercial occupancies to the satisfaction of the LACoFD.

Mitigation Measure I.1-7: The Applicant shall assure that adequate water pressure is available to meet Code-required fire flow. Based on the size of the buildings, proximity of other structures, and construction type, a maximum fire flow up to 5,000 gallons per minute (gpm) at 20 pounds per square inch (psi) residual pressure for up to a four-hour duration may be required.

Mitigation Measure I.1-8: Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

- No portion of a lot's frontage shall be more than 200 feet via vehicular access from a properly spaced fire hydrant;
- No portion of a building shall exceed 400 feet via vehicular access from a properly spaced fire hydrant;
- Additional hydrants shall be required if spacing exceeds specified distances;
- When a cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block;
- A cul-de-sac shall not be more than 500 feet in length, when serving land zoned for commercial use; and
- Turning radii in a commercial zone shall not be less than 32 feet. The measurement shall be determined at the centerline of the road. A turning area shall be provided for all driveways exceeding 150 feet in length at the end of all cul-ce-sacs, to the satisfaction of the LACoFD.

Mitigation Measure I.1-9: All onsite driveways and roadways shall provide a minimum unobstructed (clear-to-sky) width of 28 feet. The onsite driveways shall be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to, and within 30 feet of an exterior wall on one side of the proposed structure.

Mitigation Measure I.1-10: All onsite driveways shall provide a minimum unobstructed, clear-to-sky width of 28 feet. Driveway width shall be increased under the following conditions:

- If parallel parking is allowed on one side of the access roadway/driveway, the roadway width shall be 34 feet; and
- If parallel parking is allowed on both sides of the access roadway/driveway, the roadway width shall be 36 feet in a residential area or 42 feet in a commercial area.

Mitigation Measure I.1-11: The entrance to any street or driveway with parking restrictions shall be posted with LACoFD approved signs stating "NO PARKING – FIRE LANE" in 3-inch-high letters, at intermittent distances of 150 feet. Any access way that is less than 34 feet in width shall be labeled "Fire Lane" on the final tract map and final building plans.

Mitigation Measure I.1-12: The following standards apply to the Project's residential component only;

- A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length;

- The length of the cul-de-sac may be increased to 1,000 feet if a minimum 36-foot-wide roadway is provided; and
- A LACoFD approved turning radius shall be provided at the terminus of all residential cul-de-sacs.

Mitigation Measure I.1-13: The Applicant shall pay a fair share contribution for the improvement of fire service facilities that are required to off-set impacts of the Project, subject to approval of the County of Los Angles Fire Department.

5. CUMULATIVE PROJECT IMPACTS

Development associated with growth within the service boundaries of the LACoFD, including the Project and the related projects described in Section III of this Draft EIR, would combine to generate a demand for additional fire protection services. As with the Project, most of the related projects would be subject to discretionary review, including an evaluation of the adequacy of fire services and the need for mitigation measures. Should those projects cause substantial increases in the need for new facilities, mitigation measures could be required as was the case for the proposed Project.

In addition, the Project and the related Projects would generate annually recurring revenue to Los Angeles County in the form of taxes and other miscellaneous charges. A portion of such revenue may be used at the County's discretion to address costs associated with the increased demand for LACoFD operations and staffing.

As the proposed Project would mitigate its impacts, it would not contribute to a cumulative impact. However, since all related projects may not be required to support the development of new facilities, it is conservatively concluded that the impacts at the identified related projects on fire services would be significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project's potentially significant demand on existing fire service facilities would be reduced to a less than significant level through the implementation of all applicable fire code regulations and fair share fee payments, as reiterated in Mitigation Measures I.1-1 through I.1-13. Thus, no significant, unavoidable, impacts relative to fire services would occur.

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

1. INTRODUCTION

This section addresses impacts on police services that would arise with implementation of the proposed Project. The Project site is located within the jurisdiction of the Los Angeles County Sheriff's Department (Sheriff's Department). The analysis of police services is based on the Sheriff's Department ability to provide police services and facilities that would serve the Project site. Addressed in this section are impacts related to Project construction and operation. Operational impacts are analyzed in terms of levels of service, security and Project design, as well as, emergency access.

2. ENVIRONMENTAL SETTING

a. Regulatory Environment

(1) Standardized Emergency Management System (SEMS)

After the 1991 Oakland fire, the State of California passed Senate Bill 1841 to establish the Standardized Emergency Management System (SEMS), which sets forth procedures for managing response to multi-agency and multi-jurisdictional emergencies in California. The legislation mandated that by December 1, 1996, each local jurisdiction, in order to be eligible for any funding of response-related costs under disaster assistance programs, shall implement the Standardized Emergency Management System and prepare an up-to-date emergency management plan (which includes an emergency evacuation plan).

The County has prepared the Multi-Hazard Functional Plan, which serves as the emergency management plan for the entire County. The Plan, revised on February 17, 1998, sets forth procedures and measures for coordination with County agencies in the event of a disaster. In compliance with SEMS requirements the City has also prepared a Multi-Hazard Functional Plan (1996) which addresses the following functions: management, operations, logistics, planning/intelligence, and finance/administration.

(2) City of Carson General Plan

The City of Carson General Plan's Safety Element contains goals and policies that address the provision of police services in the City. Goal SAF-6 deals with ensuring the safety of residents and visitors of the City. Policies under this goal involve continued coordination between the City and the Sheriff's Department to maintain standard levels of service, to promote public outreach programs and to develop defensible space through site and building design guidelines. Other policies pertaining to this goal include the continued enforcement of established codes, such as speed limits, policing programs, and Community Watch Programs. Appropriate signage, street markings and proper landscape maintenance are also included in these policies. Goal SAF-7 is to reduce the occurrence of violent crimes, especially as committed by youth. Safety Element policies include a "zero tolerance" approach to gang related activities, to promote awareness of criminal behavior and youth related crimes, and to support programs for youth which provide jobs, education, intervention, restitution and/or enforcement strategies. Implementation measures for these goals are also identified in the Safety Element.

b. Existing Conditions

(1) Service Ratios

The service area of the Sheriff's Department totals approximately 3,157 square miles and covers the unincorporated areas of the County as well as 40 contracted cities. Currently, there are approximately 8,553 sworn officers in the Sheriff's Department serving a population of 2.8 million. Department-wide the Sheriff's Department operates a Patrol Division, a Homeland Security department, as well as Court, Correctional, and Administrative Services. The Patrol Division is divided into the following three regions: Field Operations Region I, II, and III. The Project site is located within the Field Operations Region II service area.

The City of Carson, including the Project site, is served by the Carson Sheriff Station located at 21356 South Avalon. This station also provides police services for West Compton, Gardena, Torrance, and Rancho Dominguez. Although budgeted for 181 sworn and 37 non-sworn personnel, the station is currently staffed by 151 sworn officers and 30 non-sworn full-time civilian personnel. The service ratio is 1.3 sworn officers per 1,000 residents. According to the Safety Element of the General Plan, a standard of 1.7 sworn officers per 1,000 residents is considered excellent. Thus the level of service provided by the Sheriff's Department in the City of Carson falls short of the General Plan's standard of excellence by 0.40 sworn officers per 1,000 residents. Within a 24-hour time period, approximately 30 deputies are on duty over three work shifts throughout the City. The number of patrol cars available for routine patrol is considered adequate by the Sheriff's Department. In addition, auxiliary support units are readily deployable through the Sheriff's Department response resources.

(2) Response Times

The Carson Station is a local County emergency operations center. Utilizing the Department's Sheriff's Communication Center, the nature of calls for service are assessed and dispatched from the Carson Station directly. Response Times are divided into three call types: emergent response (a call which requires an emergency response), immediate response (a call which requires a prompt, but not an emergency response), and routine response (a call of a non-emergent nature). The current year average response times for the Project area are as follows: Emergent – 4.60 minutes, Immediate – 8.09 minutes, and Routine – 35.63 minutes.

3. PROJECT IMPACTS

a. Methodology

The Los Angeles County Sheriff's Department was consulted in order to ascertain impacts that may arise with implementation of the proposed Project and to identify mitigation measures that would reduce potential impacts to a less than significant level.

b. Significance Thresholds

The Project would result in a significant impact to police protection services if:

- The Project generates a demand for additional police protection services that exceeds the existing capability of the Sheriff's Department;
- Project design fails to incorporate measures to facilitate on-site security; and
- The Project would cause an impediment to emergency access.

c. Analysis of Project Impacts

(1) Construction Impacts

The Traffic and Circulation analysis in Section IV.C of this document demonstrates that Project development would result in a less than significant impact with regard to emergency vehicle access. However, short-term construction activities, such as lane closures, sidewalk closures, and utility line construction, could have implications with regard to response times for emergency vehicles. Other implications of construction include reduced travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project site. Since

blockage or a substantial slowing of emergency vehicles is not anticipated, the Project's construction activities would constitute a less than significant impact with regard to emergency access. Furthermore, traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. With implementation of a Construction Management Plan and coordination between the Project's construction managers and the Sheriff's Department, the potential impact of construction on emergency access would be reduced to a less than significant level. Refer to Section IV.C Traffic and Circulation for further discussion.

During construction, the on-site storage of construction equipment and building materials could result in theft or vandalism which would potentially necessitate police involvement. However, it is anticipated that the existing chain-link fence that currently secures the perimeter of the Project site would be maintained throughout construction and that an on-site security force would be on duty at the Project site throughout the Project's construction period. Thus impacts on sheriff services during construction would be less than significant.

(2) Operational Impacts

(a) Levels of Service

The addition of 6,969 new residents and nearly two million square feet of commercial development would increase the demand for police services provided by the Sheriff's Department. The residential component of the proposed Project would generate a demand for police services due to the Project's permanent on-site residential population. The commercial component of the proposed Project would generate demand for police protection services due to increased traffic, employees, and patrons. In addition, crimes such as shoplifting and burglaries to vehicles that are generally associated with shopping and entertainment areas are anticipated to occur on-site with development of the commercial component of the Project.

Currently, the Carson Sheriff Station is staffed by 151 sworn officers and the service ratio is 1.3 sworn officers per 1,000 residents. According to the Safety Element of the General Plan, police service provided at a ratio of 1.7 sworn officers per 1,000 residents is considered excellent. Thus, the level of protective services provided by the Sheriff's Department in the City of Carson does not meet established standards of excellence. However, according to the Sheriff's Department an adequate number of patrol cars are available for patrol. Introduction of the Project's approximately 6,969 residents into the Sheriff Station's service area would incrementally reduce the ratio of sworn officers to residents. Thus, with Project implementation the level of service would fall short of the standard of excellence identified in the General Plan and impacts would be potentially significant.

Based upon the existing ratio of 1.3 sworn officers per 1000 persons, the Project's residents would create an additional demand for 9.1 officers. Under current conditions the Department is operating with 30 fewer sworn officers than they are currently budgeted for. As a result, the Project's incremental demand for sworn officers could be met through their current authorized sworn personnel level. Notwithstanding, based upon currently deployed personnel, Project impacts are concluded to be significant.

As the Project would increase the demand for police services such that significant impacts to existing service ratios would occur, after reviewing the proposed Project, the Sheriff's Department has made recommendations that would mitigate any potential public safety impacts associated with the Project. These recommendations are reflected in the mitigation measures identified in this section.

(b) Security and Project Design

The proposed Project is anticipated to provide on-site security personnel relative to the commercial uses in Districts 1, 2, and 3. Examples of typical duties and services that could be provided by security personnel include: controlling and monitoring activities at public spaces, private outdoor areas, loading docks, and parking areas, managing and monitoring fire/life/safety systems, and patrolling a property's perimeter.

The design of a project has also been shown to enhance security by incorporating features that facilitate on-site security. Design features that are typically implemented in developments with uses similar to those of the proposed Project include: lighted building entries and pedestrian walkways that provide for pedestrian orientation and clearly identify secure routes between parking areas and points of entry into buildings; public spaces that are designed to be easily patrolled and accessed by safety personnel; entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways that are designed to be open and in view of surrounding sites.

Though the proposed Project would be designed with the intent of facilitating on-site safety and security, as detailed design drawings of the Project are not currently available, impacts due to the Project's design are conservatively concluded to be significant. However, implementation of the recommended mitigation measures would reduce Project impacts to a less than significant level.

(2) Emergency Access

Access to the Project site would be provided via several new intersections and/or existing intersections. Intersection access points serving the Project site include Del Amo and Stamps

Drive, Lenardo Drive and Main Street, and Lenardo Drive and the I-405 interchange. Intersection service levels were evaluated in Section IV.C Traffic and Circulation to determine whether the Project would have significant impacts at nearby intersections. It is concluded that with the implementation of the identified traffic mitigation measures, Project traffic impacts would be reduced to less than significant levels at all of the analyzed location, except for the intersection of Figueroa Street and I-110 Northbound Ramps. However, due to the location of the Carson Sheriff's Station relative to the location of Project (i.e., the Station being southeast of the Project site and Figueroa Street and I-110 being to the west) it is not anticipated that emergency vehicles would pass through this intersection to gain access to the Project site. Thus, emergency access during Project operations would not be impeded and no significant impacts would occur.

4. MITIGATION MEASURES

The following mitigation measures are based on the recommendations provided by Sheriff's Department regarding the proposed Project as well as a requirement regarding the provision of private security service within Districts 1 and 2:[124]

Mitigation Measure I.2-1: The Applicant shall provide private security services within the areas of Districts 1, 2, and 3 that are occupied by commercial development. On-site security services shall maintain an ongoing dialogue with the Sheriff's Department so as to maximize the value of the security service that are provided.

Mitigation Measure I.2-2: The Applicant shall incorporate into the Project design a Community Safety Center for use by the Project's private security force and the Los Angeles County Sheriff's Department. It shall include the following features at a minimum: a front desk/reception area, a community meeting room, work space for law enforcement and public safety personnel, a video monitoring console, and restrooms. The Center shall be staffed either by a Sheriff's Department Community Services officer or personnel approved by the Sheriff's Department.

Mitigation Measure I.2-3: The Applicant shall install video cameras throughout the commercial development within Districts 1, 2, and 3 with a digitally recorded feed to the Community Safety Center that is also accessible via the internet at the Carson Sheriff's Station.

[124] *Los Angeles County Sheriff Department letter to Ron Winkler, June 29, 2005.*

Mitigation Measure I.2-4: The Applicant shall provide the Project's fair share of a budget for the deployment of a one person patrol unit which is dedicated to providing preventative patrol on the commercial portions of the Project site.

Mitigation Measure I.2-5: The Applicant shall fund Deputy Sheriffs on an overtime basis to augment security during peak periods, as jointly determined by the Applicant or its successor, and the Sheriff's Department.

Mitigation Measure I.2-6: The management of the entertainment venues located within the Project site shall notify the Sheriff's Station in advance of planned activities (i.e. movie schedules).

Mitigation Measure I.2-7: The Sheriff's Department Crime Prevention Unit shall be contacted for advice on crime prevention programs that could be incorporated into the proposed Project, including Neighborhood Watch.

5. CUMULATIVE IMPACTS

(a) Construction Impacts

As discussed in Section IV.C Traffic and Circulation, with regard to construction activities, no significant cumulative impacts associated with emergency access in and around the Project site would occur. As with the Project, related projects that would be large enough to cause lane closures or detours may be required to provide construction management plans to the City of Carson and, possibly, to police and fire services. However, since no related projects are sufficiently close to the Project site to create a cumulative impact on conjoining street segments, the cumulative effects of construction activities on emergency access would be less than significant.

In addition, the related projects are also anticipated to maintain secure sites during the respective construction periods, so that cumulative construction activities would not result in a demand on police services greater than the existing capability of the Sheriff's Department.

(b) Operational Impacts

Growth associated with development in the service boundaries of the Sheriff's Department, including the Project and the related projects, would combine to generate a demand for additional police services. As with the Project, most of the related projects would be subject to discretionary review, including an evaluation of the adequacy of police services and the need for mitigation measures. As the Project's impacts would be addressed via the identified

mitigation measures, the Project would not contribute to a significant cumulative impact on police services. Furthermore, the Sheriff's Department would have input regarding mitigation for each of the related projects. Thus, cumulative growth impacts are concluded to be less than significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of the recommended mitigation measures, impacts to police services and facilities provided by the Sheriff's Department would be less than significant.

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

1. INTRODUCTION

This section evaluates potential Project impacts on school facilities operated by the Los Angeles Unified School District (LAUSD). The analysis is based on the estimated number of students that would be generated by the proposed Project, using LAUSD student generation rates, and focuses on whether LAUSD school facilities that would serve the Project have sufficient available capacity to accommodate these students. The analysis addresses elementary, middle, and high school facilities operated by the LAUSD.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

Senate Bill 50 (SB 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of $9.2 billion, including grants for new school construction and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.[125]

SB 50 allows the LAUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD collects the maximum new school construction facility fee at a rate of $3.69 per square foot of new residential construction, $0.34 per square foot of commercial construction, and $0.09 per square foot for parking structures. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to less than significant levels.

[125] *State of California, Office of Public School Construction, School Facility Program Handbook, February 2005.*

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

Utilizing the funding sources described above, the LAUSD has implemented the New School Construction Program: a multi-year capital improvement program valued at over $9.2 billion. The New School Construction Program is the major component of the LAUSD's plan to relieve overcrowding in its schools by returning students to a two-semester (single track) calendar. By the end of 2005, 62 new schools and more than 61,000 new seats will be built. A total of 170,000 new seats will be added to the LAUSD by the end of 2012.[126]

b. Existing Conditions

The LAUSD encompasses roughly 700 square miles and serves the City of Los Angeles and all or portions of 28 other cities. The LAUSD is one of the largest public school districts in the nation. The LAUSD provides kindergarten through high school (K–12) education to a total of 746,610 students, enrolled throughout 806 schools: 434 elementary schools, 78 middle schools, 56 senior high schools, and 14 multilevel schools.[127] The LAUSD is currently divided in eight Local Districts. Formerly, the LAUSD was divided into 11 Local Districts, referred to as Regions A-K. A decision by the LAUSD to redistrict resulted in the current Local District (1–8) configuration.

In July 2004, David Taussig & Associates (DTA) conducted a study that established student generation rates ("SGR Study"), as well as a Residential Development Market Report ("Market Report"), for the LAUSD. The Market Report anticipates that over the next five years, an additional 13,217 students will reside within the District's boundaries. The SGR Study calculated student-generation rates by housing type (e.g., single family detached, single family attached, and multifamily) for each school level.[128] The student generation rates for single family attached units, which includes condominiums, are as follows: (1) 0.0867 elementary school student per dwelling unit, (2) 0.0434 middle school student per dwelling unit and (3) 0.0438 high school student per dwelling unit. The student generation rates for multifamily units are as follows: (1) 0.2396 elementary school student per dwelling unit; (2) 0.1070 middle school

[126] *Los Angeles Unified School District, Strategic Execution Plan, January 2005*

[127] *Enrollment and facilities information was obtained from the LAUSD Office of Communications website, www. lausd.k12.ca.us/lausd/offices/Office_of_Communications/Fingertip_Facts_2004_2005.pdf.*

[128] *LAUSD School Facilities Needs Analysis, Table 3, September 9, 2004*

student per dwelling unit; and (3) 0.0933 senior high student per dwelling unit. The LAUSD has experienced an increase in enrollment over the last decade, from 636,000 students in the 1994–1995 school year to over 746,000 students in the 2003–2004 school year. Further, the LAUSD has recently implemented a class size reduction program. As part of an effort to create the needed additional space, the LAUSD has implemented multi-track, year-round school calendars at many school sites. At least 30 percent of LAUSD schools are on multi-track year-round schedules to accommodate the heavy enrollment.[129] Other options available to the LAUSD include open enrollment and providing portable classrooms and new permanent facilities. Transportation of students from overcrowded schools to less crowded schools is also a possible method of addressing overcrowding, though it is not a favored solution.

The following is a list of schools that would serve the Project including location, distance from the Project site,[130] and enrollment for the 2004–2005 school year.[131]

1. Carson Elementary School is located at 161 East Carson Street approximately 1.3 miles from the Project site. Carson Elementary provides educational services for kindergarten through fifth grades and has a 2004-2005 school year enrollment of 766 students.

2. Steven M. White Middle School, located approximately 2 miles from the Project site at 22102 South Figueroa Street, serves grades 6 through 8 and has a 2004–2005 school year enrollment of 1,994 students.

3. Carson Senior High School, located roughly 1.6 miles from the Project site at 22328 South Main Street, provides educational services for 9th- through 12th-grade students and has a 2004–2005 school year enrollment of 3,662 students.

White Middle School and Carson High School are currently operating on a single-track schedule whereby instruction generally begins in early September and continues through late June. The Carson Elementary School calendar consists of four tracks.

School Capacities

As discussed above, overcrowding is a general concern for the LAUSD. The LAUSD's School Facilities Needs Analysis[132] determined that the District was 81,117 students over

[129] *David Taussig and Associates, Inc., Residential Development Market Report for Los Angeles School District.*

[130] *Approximate distances are from Development District Five of the Project site, where the residential units would be constructed.*

[131] *LAUSD School Information Branch, Planning, Assessment and Research Division, School Profiles, website, www.lausd.k12.ca.us/lausd/offices/icb/, accessed June 2, 2005.*

capacity for the 2003-2004 school year. To address this shortage in capacity and accommodate future growth, the LAUSD has implemented the New School Construction Program, as discussed above, which will construct 170,000 new seats by the end of the year 2012.

As shown in Table 62 on page 479, all three schools that serve the Project area are operating at enrollment levels which are below capacity, though Carson High School is currently operating near its capacity. As part of LAUSD's New School Construction Program, a new high school is planned for student occupancy in 2010. The school will consist of 1,870 two-semester seat (70 classrooms) and will create additional capacity within the area currently served by Carson, Banning, and Narbonne Senior High Schools. The new high school is proposed to be located on the eastern edge of Carson on Santa Fe and Carson Street in Long Beach.

School capacities can generally be increased by the use of portable or modular classrooms and/or the implementation of a year round or multi-track school calendar. Portable classrooms are generally utilized as a low-cost alternative to permanent construction to assist in the relief of school overcrowding. These facilities are designed to accommodate 25 students per portable unit for elementary schools and 30 students per portable unit for middle and high schools. Utilization of portable classrooms is subject to the maintenance of minimum open space requirements at each school. Implementation of year-round and multi-track calendars can also serve to increase school capacity by roughly one-third.

3. PROJECT IMPACTS

a. Methodology

The analysis of potential Project impacts is based on the number of students generated by the Project and the estimated operating capacity of the school facilities that would serve the Project. The student generation rates used in this analysis and current school capacity data were obtained directly from the LAUSD. The methodology used in this analysis assumes that the number of new students generated from the residential component of the Project is directly related to the dwelling unit type and amount of proposed construction.

The methodology used to estimate the number of students that would be generated by the Project's commercial component takes into account the location of the employee's residence as the number of students attending schools in proximity to the parent's workplace is relatively limited. Based on this approach, the attendance boundaries for each of the three schools that would serve the Project site were mapped and the distances from the Project site were calculated.

[132] *LAUSD School Facilities Needs Analysis, Table 7, September 9, 2004*

Table 62

School Capacity

School	Current Enrollment	Estimated Capacity [a]	Available Existing Capacity
Carson Elementary School	766	999	233
White Middle School	1,994	2,400	406
Carson Senior High School	3,662	3,675	13

[a] *Estimated operating capacity including magnet authorization as per LAUSD Information Request for an EIR Report, July 27, 2005.*

Source: Letter sent to PCR Services Corporation. from Mary Prichard, LAUSD, July 29, 2005.

These distances were then converted to travel time so as to correlate this information with data published as part of Census 2000. Using Census 2000 data, the number of Project employees that would reside within the attendance boundaries of each of the three schools was calculated. The number of students generated by these employees was then calculated using LAUSD student generation factors.

The LAUSD limits its enrollment forecasts to five-year projections with the latest forecast being for the 2009 school year. Though Project buildout is anticipated to occur in 2010, future school capacity determinations are made based on LAUSD's five-year projections as this constitutes the best available information. Thus, the 2009 forecast is used for analyzing impacts at Project buildout as it represents the LAUSD's forecast closest to the Project's buildout year.

The number of students generated from the proposed Project was added to the projected 2009 enrollments and compared to the estimated operating capacities of the schools that would potentially serve the Project site. The extent to which Project-generated students could be accommodated within existing and/or expanded facilities was evaluated. The following methodology was used to determine potential Project impacts:

1. The number of students generated by the Project is calculated using LAUSD student generation rates.

2. The number of Project-generated students is compared to the estimated operating capacity at each school that serves the Project site.

3. A determination of the adequacy of LAUSD facilities to accommodate the students generated by the proposed Project is made.

4. If the analysis concludes that existing school facilities would be inadequate to accommodate the Project-generated students, the potential to increase the school's capacity is evaluated.

b. Thresholds of Significance

The proposed Project would have a significant impact on LAUSD schools if:

- The Project's demand for school services exceeds the capacities of the schools that would serve the Project site such that the Project's increased demand would require the construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions that would create a temporary or permanent impact on the school(s).

c. Impact Analysis

The LAUSD has developed student generation rates for a variety of housing types. For this analysis, student generation rates applicable to condominium units (i.e., single family attached) and multi-family residential units were utilized, as they are reflective of the type of development proposed to occur at the Project site. The proposed Project would introduce an additional 1,550 residential units (1,150 for sale units and 400 rental units) and approximately 6,969 new residents into the City of Carson. As shown in Table 63 on page 481, based on LAUSD student generation rates, the residential component of the Project would generate a total of 376 students.

Additional students would also be generated by the Project's commercial component. These students would most likely attend schools within the LAUSD's service boundaries, some of which would attend the schools identified to serve the Project site. Based on the attendance boundaries of these schools, it is anticipated that the elementary students generated by the commercial component of the Project would reside within an approximately five-minute drive of their homes, middle school students would reside within an approximately 10-minute drive of their homes, and high school students would reside within an approximately 15-minute drive of their homes. Thus, Project employees who travel less than five minutes to work would generate students within the attendance boundaries of Carson Elementary School, Project employees who travel less than 10 minutes to work would generate students within the attendance boundaries of White Middle School, and Project employees who travel less than 15 minutes to work would generate students within the attendance boundaries of Carson Senior High School.

According to Census 2000 data, approximately three percent of all workers in the City of Carson travel less than five minutes to work, 10 percent travel less than 10 minutes to work, and 22 percent travel less than 15 minutes to work.[133] It is anticipated that travel time to work for the

[133] *Census 2000, Table P31. Travel Time to Work for Workers 16 Years and Over.*

Table 63

Estimated Student Generation for the Project

A. Residential Component

	Condominium Units (For Sale)			Multi-Family (Rental)			
School Level	Number of Units	Student Generation Rate [a]	Total	Number of Units	Student Generation Rate [a]	Total	Forecasted Student Generation
Elementary	1,150	0.0867	100	400	0.2396	96	196
Middle	1,150	0.0434	50	400	0.1070	43	93
High	1,150	0.0438	50	400	0.0933	37	87
Total	**1,150**	**0.1739**	**200**	**400**	**0.4399**	**176**	**376**

B. Commercial Component

School Level	Student Generation Rates [c]	Number of Employees within Attendance Boundaries	Forecasted Student Generation[b]
Elementary	0.106	160	17
Middle	0.049	532	26
High	0.060	1,170	70
Total			**113**

C. Combined Total from Residential and Commercial

	Elementary	Middle	High	Total
Students Generated	213	119	157	**489**

[a] *LAUSD Student Generation Rates, School Facilities Needs Analysis, Table 3, September 9, 2004*
[b] *Number of Students rounded to the nearest whole number.*
[c] *Based on rates generated by LAUSD.*

Source: PCR Services Corporation.

employees generated by the Project would be similar to that of other workers living in the City of Carson. The Project would generate approximately 5,320 employees; 160 employees would constitute three percent, 532 would constitute 10 percent, and 1,170 would constitute 22 percent of the total.

Based on the number of employees living within the attendance boundaries of the schools that would potentially serve the Project site and the LAUSD student generation rates, employees of the commercial component of the Project would generate 113 students: 17 students within the attendance boundaries of Carson Elementary School, 26 students within the attendance boundaries of White Middle School, and 70 students within the attendance boundaries of Carson

High School.[134] Therefore the Project's residential and commercial components collectively would generate a total of 489 students that would attend the schools identified to serve the Project, consisting of 213 elementary school students, 119 middle school students, and 157 high school students.

The actual number of students who would attend the LAUSD schools identified above may be less than the number calculated by the LAUSD Student Generation Factor as the analysis does not take into account the following options that could allow students generated by the proposed Project to enroll in LAUSD schools away from their home attendance area based on the availability of classroom seats at the desired school:

- Open enrollment enables students anywhere within the district to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats;
- Magnet schools and magnet centers are open to all students in the LAUSD. Transportation is provided to students who participate in magnet programs who live outside a two-mile radius or outside the magnet school attendance boundary;
- Permits With Transportation (PWT) program allows students to continue to go to the schools within the same feeder pattern[135] of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the PWT program regardless of where they live within the District;
- Intra-district and inter-district parent employment-related transfer permits allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed;
- Sibling permits enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits enable students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency or private organization or a verifiable child care provider.

[134] *The Project's commercial component would generate a total of 1,144 students (i.e., 935 elementary school, 427 middle school, and 464 high school) that would attend schools throughout LAUSD's jurisdiction. As these students would be spread across a number of LAUSD schools, Project impacts on the capacity of any one school are anticipated to be less than significant.*

[135] *A feeder pattern is the linkage from an elementary school to a middle school and a middle school to a high school.*

Enrollment levels at the above-identified schools are currently below capacity. However, based upon the estimated number of Project-generated students, the increased enrollment attributable to the proposed Project would exceed existing school capacities at Carson Elementary School and Carson Senior High School and, thus, would result in a potentially significant impact on these schools. Though, as previously discussed, a new high school consisting of 1,870 two-semester seats is planned for student occupancy in 2010 and would relieve overcrowding at Carson Senior High School. The LAUSD would decide on whether to address the need to accommodate these students via the construction of new facilities, the use of portable classrooms, reorganization of students or classrooms, or changes to single-track school calendars. Furthermore, the City has identified potential changes in school attendance boundaries as a method of addressing impacts at Carson Elementary School, with students attending Towne Avenue Elementary School.

Construction Impacts

On-site construction activities, as well as construction traffic (e.g., worker travel, hauling activities, and the delivery of construction materials), would not affect existing school traffic, pedestrian routes, and transportation safety in the Project vicinity. Haul routes to and from the Project site during construction would be primarily by way of the I-405 freeway with southbound traffic utilizing Main Street and northbound traffic utilizing Avalon Boulevard. As such, haul routes would not pass in front of any schools in the area. Further, as site access would be via I-405 on- and off-ramps, haul routes would not utilize the local roadway network in a very limited manner due to the proximity of the Project site to these ramps. Therefore, it is concluded that Project construction traffic would not interfere with school bus or school pedestrian routes. Construction staging and construction-related vehicle parking would not occur on or near school property as there are no schools adjacent to the Project site. Furthermore, as the Project site is essentially undeveloped, there is sufficient area to accommodate construction activities on-site. Safety and security would be maintained throughout construction of the Project as construction activities would adhere to all applicable standard construction standards including those set forth in the California Vehicle Code. The perimeter of the Project site is currently secured with a chain link fence and would remain secured as such throughout Project construction. Therefore, impacts associated with Project construction would be less than significant**.**

4. MITIGATION MEASURES

The students generated by the proposed Project, based on the preceding analysis could not be accommodated within the existing facilities at Carson Elementary School and Carson Senior High School. Pursuant to California Government Code Section 65995, payment of the developer fees required by State law provides full and complete mitigation of the Project's impacts on school facilities. Therefore, no other mitigation measures are required.

5. CUMULATIVE IMPACTS

Section III.B of this Draft EIR provides a list of related projects which have the potential to occur concurrent with the development of the proposed Project. Cumulative impacts related to schools were considered only for projects within the same attendance boundaries as the schools identified to serve the Project: Carson Elementary School, White Middle School, and Carson Senior High School. Cumulative impacts were assessed utilizing LAUSD student generation rates. As shown in Table 64 on page 485, related projects would generate approximately 197 students: 15 Elementary, 76 Middle, and 106 High School. The generation of students from related projects in combination with students generated by the proposed Project would result in a potentially significant impact to Carson Elementary School and Carson Senior High School as existing school capacities would be exceeded. As previously discussed, school capacity can be increased by the use of portable or modular classrooms and the implementation of year round or a multi-track school calendar. Portable classrooms are generally used to relieve overcrowded schools and are designed to accommodate 25 students per portable unit for elementary schools and 30 students per portable unit for middle and high schools. Implementing year round and multi-track calendars also serve to increase school capacity by roughly one-third. As noted above, the City has identified potential changes in school attendance boundaries as a method of addressing impacts of Project generated students at local schools. Changes in school boundaries may be further considered by LAUSD in light of the larger impacts occurring with the related projects. The school facility development fees that would be paid by all new development, under the provisions of SB 50 would constitute full mitigation for the impacts of these new developments, thereby reducing individual and cumulative Project impacts to a level that is less than significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potential impacts to LAUSD schools associated with the proposed Project, based on available forecasted capacity within existing facilities, would be potentially significant. Pursuant to the provisions of Government Code Section 65995, a project's impact on school facilities are fully mitigated through the payment of the requisite school facility fees current at the time building permits are issued. As the Project applicant is required to pay school facility development fees, potential Project impacts to schools are concluded to be less than significant.

Table 64

Impacts of Related Projects on Schools

A. Residential Development

Dwelling Unit Type	Units	SGR	Elementary	Units	SGR	Middle	Units	SGR	High
Single Family Detached	18	0.2184	4	59	0.0981	6	160	0.112	18
Single Family Attached	98	0.0867	9	6	0.0434	0	383	0.0438	17
Multifamily	0	0.2396	0	0	0.107	0	0	0.0933	0
Total			**13**			**6**			**35**

B. Commercial Development

	Amount of Proposed Development			
Land Use	Within Elementary School District	Within Middle School Districts	Within High School District	Employee Density Factor [a]
Office (sq.ft.)	0	0	195,000	250
Retail (sq.ft.)	5,620	525,491	15,870	375
Recreation (sq.ft.)	0	0	80,000	500
Church (sq.ft.)	0	5,200	5,200	500
Movie Theater (seats)	0	2,000	0	5,000
Childcare (children)	0	0	150	12:1
Hotel (Rooms)	0	0	200	0.9
	Forecasted Employment			
Office (sq.ft.)	0	0	780	
Retail (sq.ft.)	15	1,400	42	
Recreation (sq.ft.)	0	0	160	
Church (sq.ft.)	0	10	10	
Movie Theater (seats)	0	15	0	
Childcare (children)	0	0	13	
Hotel (Rooms)	0	0	180	
Total	15	1,425	1,185	

School Level	Employees	Student Generation Factor	Student Generation
Elementary	15	0.106	2
Middle	1,425	0.049	70
High	1,185	0.060	71
Total			**143**

C. Combined Residential and Commercial Development

School Level	Residential	Commercial	Total
Elementary	13	2	15
Middle	6	70	76
High	35	71	106
Grand Total			**197**

[a] *Factors generated by LAUSD and PCR Services Corporation from the Institute of Transportation Engineers, Trip Generation Manual, 6th Edition, 1997.*

Note: Student generation rates (SGR) obtained from David Taussig and Associates, Inc., SGR Study, Los Angeles Unified School District, July 2004.

Source: PCR Services Corporation, 2005.

ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
4. PARKS AND RECREATION

1. INTRODUCTION

This section analyzes the potential impacts of the proposed Project with regard to the parks and recreational facilities that would serve the Project's future residents. The analysis evaluates the Project's provisions for park area and open space compared to established City goals and regulatory requirements. The City of Carson Parks and Recreation Department would be the principal provider of recreational facilities to the proposed Project's residents. Additional recreational facilities in the Project vicinity are provided by the County of Los Angeles Parks and Recreation Department. In addition, other recreational facilities are available in the Project area that are either privately owned or related to school facilities.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) Quimby Act

The California Government Code, Section 66477 (Quimby Act) was enacted in an effort to promote the availability of park and open space areas in response to the need for such facilities by residential development. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land and/or the payment of fees for park and/or recreational facilities for projects involving residential subdivisions. The Quimby Act provides that the dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the legislative body may adopt a higher standard not to exceed five acres per 1,000 persons.

(2) City of Carson General Plan

The City of Carson General Plan Update ("General Plan") was approved by the City Council on October 11, 2004. The General Plan addresses the need for the provision of land for parks and recreational use in both the Parks and Recreation and Open Space and Conservation

Elements. The following discussion identifies the City's existing park area and open space resources, and describes the goals and standards set forth to preserve and expand these resources.

(a) Parks and Recreation Element

The Parks and Recreation Element indicates that community recreation planning should address the following seven issues: (1) the need for additional recreational facilities in the City; (2) the need for enhanced safety and maintenance of the City's parks; (3) the need to promote a variety of recreational and educational facilities for the development of the community's youth; (4) the need to provide affordable recreational and cultural programs; (5) the need for leisure services for seniors in the community, as the number of persons over the age of 50 continues to increase; (6) the need for locally based cultural arts programs (i.e., theater, music, art, dance, etc.) to enrich community life; and (7) the need to address the recreation and social needs of the community's emotionally and physically challenged residents. Though not included as part of the Parks and Recreation Element's goals, policies, or implementation measures, the City's target ratio of public park area to population is four acres of park area per 1,000 persons.

The City classifies parks according to three types: regional, neighborhood and mini. Regional parks are intended to serve the community and surrounding area and are located on or near arterial roadways to facilitate accessibility via automobile, foot, or bicycle. Neighborhood parks are located within walking or biking distance of the neighborhood or neighborhoods they serve. Facilities at neighborhood parks typically include ball fields, basketball courts, children's play areas, and picnic areas. Mini parks serve areas where limited land availability constrains the provision of a larger facility. These parks generally include children's play areas and picnic areas.

(b) Open Space and Conservation Element

The intent of the Open Space and Conservation Element of the General Plan is to recognize and conserve open space resources within the City. Government Code Section 65302(e) defines open space for the purpose of outdoor recreation as "areas of outstanding scenic, historic and cultural value; areas particularly suited for park and recreation purposes…and areas which serve as links between major recreation and open space reservations, including utility easements…trails, and scenic highway corridors." Open space in the City is comprised of Recreational Open Space and General Open Space. Park area and the Victoria Public Golf Course are considered Recreational Open Space areas. Utility transmission corridors, drainage and flood control facilities, and the Goodyear Blimp Port comprise the City's General Open Space. The Open Space and Conservation Element does not specify a standard for the provision of open space separate from that set forth in the Parks and Recreation Element.

The City's General Plan establishes goals and policies related to parks, recreation facilities, and open space areas in the City. In addition to these standards, park area requirements are also set forth in Section 9207.19 of the Carson Municipal Code (Municipal Code). The following provides information regarding applicable Municipal Code standards and requirements.

(3) City of Carson Municipal Code

(a) Parks and Recreational Facilities

Section 9207.19 of the Carson Municipal Code, as authorized under the State Quimby Act, applies to new residential subdivisions and requires that every subdivider dedicate a portion of land for recreational use, or pay a fee in lieu of land dedication, or a combination of both. Park area acreage requirements for subdivisions are determined by the type of dwelling unit to be constructed and the population density per unit. As stated above, the amount of land required to be dedicated shall equal the proportionate amount necessary to provide three acres of park area per 1,000 residents unless the amount of existing neighborhood and community park area exceeds that limit.

This Municipal Code Section permits private recreational space and improvements to be credited against a project's land dedication requirement. "Private recreational space" is defined as land which is reasonably adaptable for park and recreation use. The crediting of private recreational space against a project's land dedication requirement is subject to specific criteria set forth in the Municipal Code. Open areas, such as yards and setbacks, required by the zoning and building regulations are not eligible to be credited against a project's land dedication requirement. Credit for private recreational space shall not exceed 30 percent of the land which would otherwise be required to be dedicated pursuant to this Section of the Municipal Code. Recreational improvements may also be credited, provided that the value of the improvements does not exceed the value of the private recreational space upon which these improvements are located.

(b) Open Space

Section 9126.28 of the Municipal Code requires that, for multiple-family dwelling projects of one acre or less, at least 30 percent of the net project area consist of usable open space, and for projects greater than one acre, usable open space comprise at least 40 percent of the net project area. Subject to the approval by the City, open space may include one or more of the following, designated for the use and enjoyment of all the occupants of the planned residential development:

- Common open space developed for recreation purposes.
- Areas of scenic or natural beauty forming a portion of the proposed development.
- Present or future recreational areas of a noncommercial nature including parks and playgrounds. Where specifically approved by the approving authority, green fees or similar charges related to use of a golf course or similar open recreational use may be permitted, provided such charges are incidental to the operation of said facilities, are not primarily commercial in nature, and do not alter the character of the recreational facility.
- Present or future hiking, riding or bicycle trails.
- Landscaped areas adjacent to streets or highways which are in excess of minimum required rights-of-way.
- Other similar areas determined appropriate by the approving authority.

Sections 9128.54 and 9128.15 of the Municipal Code pertain to private open space standards for multiple-family dwelling units, and condominiums, respectively. According to these Municipal Code Sections, private open space, notwithstanding the minimum total amount of usable open space required for a multiple-family dwelling project, should include an appurtenant private patio, deck, balcony, atrium or solarium with a minimum area of 150 square feet, except that one bedroom and zero bedroom units shall have a minimum of 130 square feet for each unit. In addition, private open space should be designed for the sole enjoyment of the unit tenant(s) and guests, and shall have at least one weatherproofed, duplex electrical convenience outlet. Additionally, such space shall be at the same level as, and immediately accessible from, either a kitchen, dining room, family room or living room within the unit.

According to the Municipal Code's definition of private recreational space, common (usable) open space provisions pursuant to this Section would potentially qualify to be credited against a project's land dedication requirements, whereas, private open space provisions would not.

(c) City of Carson's Five-Year Capital Improvement Plan

The City of Carson's Five-Year Capital Improvement Plan (CIP) identifies several projects which include either the expansion and/or improvement of existing recreational facilities in the Project area. The CIP is a financial plan of the City's proposed capital improvement projects including the means of financing them. The following is a list and summary of nearby planned recreational projects.

- Anderson Park Improvement Project. This project includes the addition of a meeting room to an existing remote restroom.

- Carson Park Improvement Project. This project consists of two phases. Phase 1 is currently in the planning process and will address many long-standing issues with regard to the turf and irrigation system at Carson Park. Phase 2 of the Carson Park Improvement Project will address guidelines set forth in the Code of Federal Regulations (CFR) under the Americans with Disabilities Act (ADA) at the pool. Improvements will include pool and locker room refurbishments, and office and storage room upgrades to meet ADA requirements. Improvements to the park will include security lighting upgrades, sports lighting, remote restroom refurbishment, perimeter fencing, and a ball wall.

- Del Amo Park Improvement Project. This project includes the repair of the baseball diamond, the addition of fencing to baseball diamond number one, and the upgrade of sports lighting for energy efficiency. It also includes the installation of raised planters with trees around the playground and the addition of shade cover to the picnic area.

- Mills Park Improvement Project. This project includes the addition of a meeting room with restrooms and the upgrade of facilities to meet ADA requirements.

b. Existing Conditions

(1) Parks and Recreational Facilities

There are 16 public parks, one county park and two public golf courses totaling 354 acres in the City of Carson. The City does not include Dominguez Golf Course in calculating its ratio of park area per resident, therefore, a total of 315 acres is used for this purpose. The City's 2000 Census population is 89,730. Thus, park area is currently provided at a rate of 3.5 acres per 1,000 residents. Park and recreational space owned and operated by the City is provided at a rate of 1.72 acre per 1,000 residents.[136] These ratios do not meet the City's stated target ratio for the provision of four acres of park area per 1,000 persons. However, these ratios do not take account public school facilities or commercial recreational facilities, the inclusion of which would greatly increase the ratio of park area per 1,000 residents. Public schools with onsite recreational facilities total 546.1 acres, 349.2 of which are within the California State University Dominguez Hills campus. California State University Dominguez Hills has 40 acres developed with recreational facilities including a large multi-purpose soccer field, 12 tennis courts, track and field facilities, baseball and softball fields, a gymnasium, and an inline roller rink. In addition, the City has a Joint Use Agreement with the Los Angeles Unified School District (LAUSD) for

[136] *Assumes City of Carson population of 89,730 based on 2000 Census data.*

the use of playfields, tennis courts, and other recreational facilities during off-school hours at Carson High School and Caroldale Elementary School.

The City of Carson has identified twelve parks that are located in proximity to the Project site and, thus, would potentially be used by Project residents. The twelve parks, as shown in Figure 39 on page 492, include the following: (1) Anderson Park; (2) Calas Park; (3) Carson Community Center; (4) Carson Park and Pool; (5) Del Amo Park; (6) Dominguez Golf Course (7) Hemingway Park (8) Mills Park; (9) Scott Park; (10) Veterans Park and Sports Complex; (11) Victoria Golf Course; and (12) Victoria Park. The following is a brief description of the facilities present at each of these park and recreational facilities.

1. Anderson Park – An 8.5-acre park including basketball courts, a children's play area, a Frisbee golf course, a meeting/craft room, picnic areas, four tennis courts, and a wading pool.

2. Calas Park — Encompasses 8.7 acres and includes the following recreational features: ball field, basketball courts, children's play area, meeting/craft rooms, picnic areas, snack bar, tennis courts, and wading pools.

3. Carson Community Center – The Community Center property encompasses 12 acres with 78,400 square feet consisting of 26 meeting/craft rooms, a new senior hall, and two early childhood education rooms.

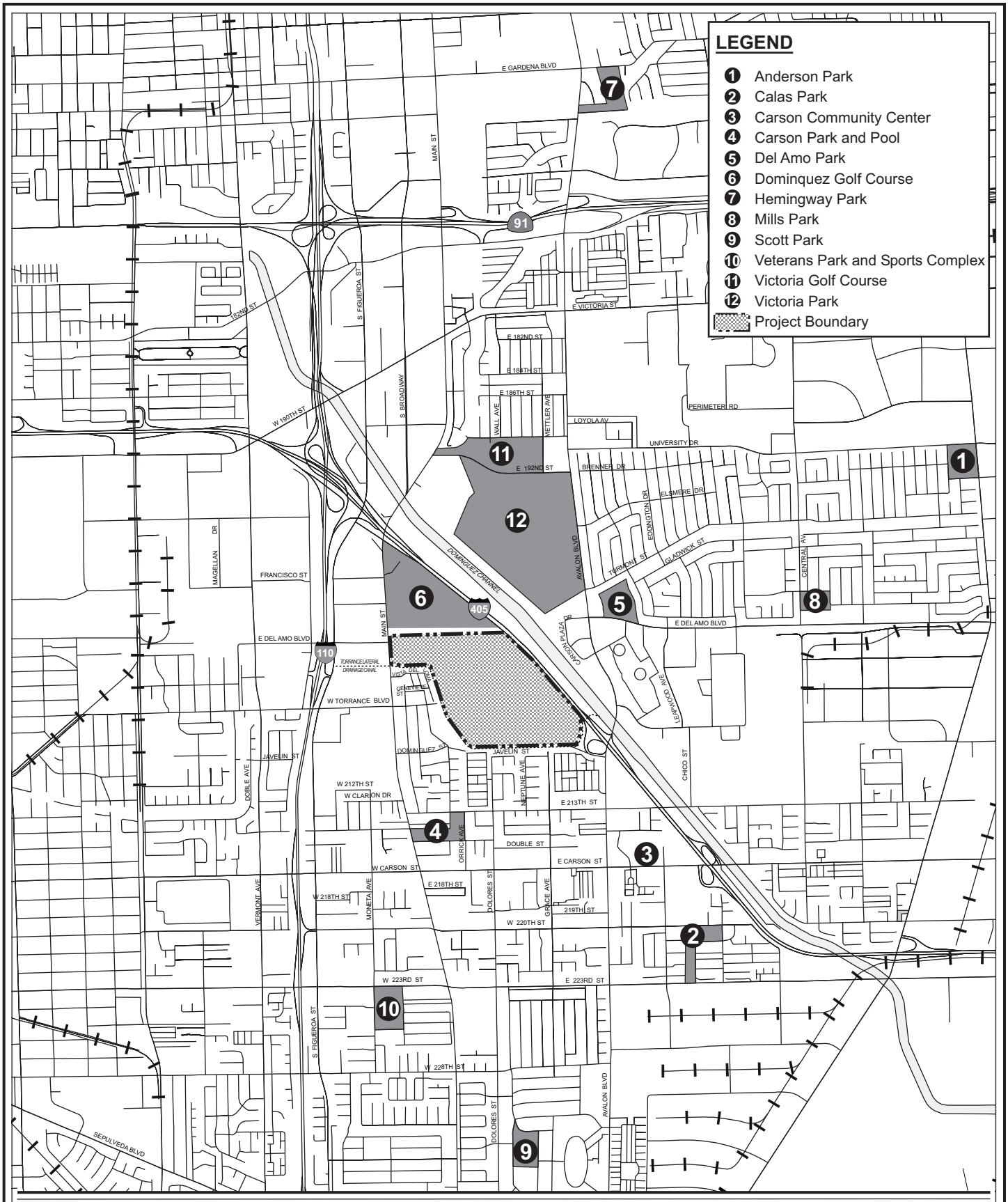
4. Carson Park and Pool — Encompasses 10.9 acres and includes the following recreational features: ball fields, basketball courts, children's play area, football field, horse-shoes, meeting/craft rooms, picnic areas, snack bar, soccer field, volleyball courts, and swimming pool.

5. Del Amo Park — Encompasses 9.5 acres and contains: ball fields, basketball courts, children's play area, football field, meeting/craft rooms, picnic areas, and snack bar.

6. Dominguez Golf Course — Encompasses 39.2 acres and is an 18-hole, par 3 golf course with a two tier driving range. The City classifies this golf course as a non-City recreational facility.

7. Hemingway Park - Encompasses 13 acres and includes two ball fields, two basketball courts, children's play area, meeting/craft rooms, picnic areas, snack bar, tennis courts and a proposed 25-yard swimming pool.

8. Mills Memorial Park – A 5-acre park including a children's play area, meeting/craft rooms, picnic areas, and a wading pool.



PCR

Figure 39
Parks and Recreational Facilities in Proximity of the Project Site

Source: Thomas Guide 2004 and PCR Services Corporation

9. Scott Park – An 11.2-acre park including two basketball courts, two ball fields, a children's play area, meeting/craft rooms, picnic areas, a snack bar, and tennis courts. A 25-yard swimming pool is proposed.

10. Veterans Park and Sports Complex — Encompasses 12.6 acres and includes the following recreational facilities: ball fields, basketball courts, children's play area, horse-shoes, meeting/craft rooms, snack bar, tennis courts, wading pools, 25,000 sq. ft. building with basketball courts, gymnasium, volleyball courts, fitness center, and racquetball courts. A skate park is also planned.

11. Victoria Golf Course - The golf course encompasses roughly 162 acres and is a public recreation course. This is a Los Angeles County recreational facility.

12. Victoria Park— The park area consists of 36 acres and includes: ball fields, basketball courts, a swimming pool, gymnasium, tennis courts, a play area, a recreation building, and a picnic area. This is a Los Angeles County recreational facility.

(2) Open Space

Open space areas in the City of Carson totals 599 acres. This acreage includes 153 acres of parks, the 162-acre Victoria Public Golf Course, 30 acres for the Goodyear Blimp Port, and 254 acres of drainage courses and utility transmission corridors. This open space calculation does not include the City's street medians and parkways, nor does it include open space associated with public schools which is estimated to be 118 acres.[137] California State University Dominguez Hills also has 125 acres of planned and existing recreational open space. The City considers closed landfills, such as the Project site, which have not been fully remediated to be temporary open space areas.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The impact analysis focuses on the proposed Project's potential impacts related to the provision of parks and recreation areas, as well as the provision of open space. To assess these impacts, the Project's provision of both park space and open space is compared to the requirements set forth in the respective sections of the Carson Municipal Code. The conclusions in this analysis are based on whether the proposed Project would be consistent with adopted

[137] *City of Carson General Plan Update approved by the City Council on October 11, 2004*

General Plan goals, policies, and implementation measures as well as the requirements of the Carson Municipal Code.

b. Thresholds of Significance

In recognition of the importance of parks and open space to its residents, the City of Carson provides for park and recreation facilities through means of planning and regulations. Therefore, the City has concluded that the park area and open space needs of its residents are met through compliance with these provisions. Accordingly, the proposed Project would be considered to have a significant impact on parks and recreation if:

- The Project would not include park and recreation space consistent with adopted General Plan goals, policies and implementation measures as well as the requirements of the Carson Municipal Code.

c. Impact Analysis

(1) Project Design Features

Common and private open space would be provided throughout the residential areas of the Project site. Per the requirements of the Specific Plan, private open space would be provided at a 60 square-foot minimum per dwelling unit with a minimum dimension of five feet in any direction. Common open space would be provided at the rate of 300 square-foot minimum per unit in District 3; 200 square-foot minimum per ownership unit in District 1; and 150 square-foot minimum per rental unit in District 1. Common open space for each unit would have a minimum dimension of 10 feet in any direction. The Project would also use the existing berm along the southern and southwestern edges of the Project site, adjacent to the Torrance Lateral as common open space. This approximately 9-acre area would be landscaped with a combination of trees, shrubs and groundcovers, and would provide a buffer between Project development and off-site residential development to the south. Further, the Project would be required to meet park and open space requirements through a combination of land dedication, improvements, private recreation, and in-lieu fees per Section 9207.19 of the Municipal Code. Recreational amenities for use by the Project's residents would also contribute to the Project's common open space provisions. Specifically, to meet the recreational needs of Project residents, a health club is proposed on the ground floor of the multi-family apartment buildings.

The proposed Project would contain a shopping and entertainment component which would make up a large portion of the central area of Districts 1 and 2. This area is conceptually proposed to include a plaza with water features, outdoor dining and other pedestrian-oriented amenities, which would be available to the general public and serve as gathering spaces in the

central area of the Project. Further, commercial structures area also conceptually proposed to be clustered in such a way as to create plazas and pedestrian malls.

The Project's proposes pedestrian and bicycle routes to provide maximum connectivity for pedestrians and bicyclists between the diverse uses within the Project site. External bicycle access to the Project site would primarily occur via Class II (separate lanes) and Class III routes, along Main Street and Del Amo Boulevard. Pedestrian access to the Project site would also occur via sidewalks on these same streets. Multipurpose paths (with side-by-side paths for pedestrians and bicycles) are proposed both at the Project's Del Amo entrance and from Avalon Boulevard into the Project's southeastern entrance. Internally, bicycle circulation would be provided along the Loop Road via Class II bicycle lanes and along the Corridor Road via a Class III bicycle route. Pedestrian circulation would be provided throughout the Carson Marketplace via sidewalks and pathways. The routing of pedestrian and bicycle circulation is conceptually shown in Section II., Project Description, on Figure 6 on page 87.

(2) Project Impacts

(a) Park and Recreational Facilities

As the Project is located at the site of a former landfill, landscaped areas would be limited onsite, and the recreational activities of the Project's residents are anticipated to occur predominantly off-site. Park and recreational facilities in the City of Carson include 16 public parks, one county park and two public golf courses. Of these parks and recreational facilities, 12 have been identified by the City as being those that could be used by Project residents, due to their proximity. Due to the varying amenities available and the geographical distribution of the identified parks and recreational facilities, Project demand would likely be met via several facilities. Therefore, as usage would be distributed throughout a number of different parks and recreational facilities, a significant impact is not anticipated to occur at any one facility.

According to the City's General Plan, park area is currently provided at a ratio of 3.5 acres per 1,000 residents Citywide. This ratio does not meet the City's target ratio of four acres of park area per 1,000 persons. The additional population generated by the proposed Project would cause the existing ratio to decline incrementally, thereby, further contributing to the City's shortfall in the provision of park area relative to the four acre standard. However, as the Project's residents would constitute a small percentage of the City's population, implementation of the Project would not cause a decline in the park area to resident ratio such that significant impacts would result. Further, the City's target ratio of four acres of park area per 1,000 persons has been identified as a target, but at this time has not been codified or set forth in the goals, policies, or implementation measures identified in the Parks and Recreation Element; thus, the Project would not conflict with the provisions specified in the City's General Plan.

Section 9207.19 of the Municipal Code, as authorized under the State Quimby Act, applies to new residential subdivisions and requires that every subdivider dedicate a portion of land, or pay a fee, or a combination of both. Currently, the amount of land required to be dedicated equals the proportionate amount necessary to provide three acres of park area per 1,000 residents. However, as previously discussed, the City's new target ratio is four acres per 1,000 residents. If a proposed revision of Ordinance No. 94-1048, fees and/or dedication requirements is adopted, the requirements would be recalculated to reflect that.

Park acreage requirements are determined by the type of dwelling unit to be constructed and the population density per unit. For the proposed Project, the amount of land required to be dedicated is based on the multiple-family dwelling type consisting of five or more units which assumes a population density of 2.75 persons per unit and presently requires 0.003 acres per person or 0.00825 acres per dwelling unit. In the case of the proposed Project this would equate to a land dedication of approximately 12.80 acres.[138]

As previously discussed, the Municipal Code permits private recreational areas and improvements within a project site to be credited against a project's land dedication requirement. The Specific Plan proposes to meet the currently adopted requirements of Section 9207.19, equivalent to three acres per 1,000 population, through the provision of park space, on-site improvements, and/or, the payment of in-lieu fees. Therefore, the Project would be consistent with Municipal Code requirements and, thus, would have a less than significant impact with regard to the provision of park space.

(b) Open Space

Private open space, as described in the Specific Plan, would be provided at a 60 square-foot minimum per dwelling unit with a minimum dimension of five feet in any direction. Common open space would be provided at the rate of 300 square-foot minimum per unit in District 3; 200 square-foot minimum per ownership unit in District 1; and 150 square-foot minimum per rental unit in District 1. Common open space for each unit would have a minimum dimension of 10 feet in any direction. The provision of open space within a development complements the provision of park area as private open space accommodates the needs of Project residents, while common open space meets a variety of purposes including space for recreational activity, and space for scenic and landscaping treatments. Some or all of such space may be provided in a manner that would contribute to park and recreation space pursuant to Section 9207.19 of the Municipal Code, as described above.

[138] *1,550 Project dwelling units multiplied by 0.00825 acres per unit as required by the Municipal Code.*

The Project's proposed provision of 60 sq.ft. of private open space per unit is less than the square footage minimums required by Sections 9128.54 and 9128.15 of the Municipal Code; i.e., 150 square feet per multiple bedroom unit and 130 square feet per one bedroom or zero bedroom unit. While the Project provides less private open space than that required by the Municipal Code, the Project conceptually proposes to include other amenities that would serve residents, e.g. health clubs on the ground floor of the multi-family apartment buildings. To assure that the intent of the Municipal Code is met with regard to the provision of private open space, a mitigation measure is proposed to address this potentially significant impact.

As previously discussed, Common open space would be provided at the rate of 300 square-foot minimum per unit in District 3; 200 square-foot minimum per ownership unit in District 1; and 150 square-foot minimum per rental unit in District 1. Common open space for each unit would have a minimum dimension of 10 feet in any direction. With 1,550 dwelling units, this would equate to 315,000 sq.ft., or 7.23 acres at Project buildout. The Project would also use the existing berm along the southern and southwestern edges of the Project site, adjacent to the Torrance Lateral as common open space. This approximately 9-acre area would be landscaped with a combination of trees, shrubs and groundcovers, and would provide a buffer between Project development and off-site residential development to the south.

Pursuant to Section 9126.28 of the Municipal Code, as the residential component of the proposed Project would be greater than one acre in size, at least 40 percent of the net land area would be required to be devoted to usable open space. In addition, pursuant to Section 9191.422 of the Municipal Code, any grade steeper than 5% can not be classified as useable open space. The Project as proposed would develop approximately 26.1 acres with residential uses. This would equate to a 10.44-acre requirement for the Project.[139] The Specific Plan requires that at least 40 percent of common and private open space must be usable for recreation, which is defined as open space with an average gradient of not more than five percent and excludes sidewalks within the public right-of-way and landscaped areas other than turf. Usable open space may include, but is not limited to, balconies, terraces, roof gardens, children's playgrounds, pools, clubhouses, and landscaped setbacks.

In order to meet the 10.44-acre requirement, an additional 3.21 acres would be required over the 7.23 acres that would occur per the square-footage per unit requirements described above. While the Applicant has proposed various features to contribute to meeting the 10.44-acre requirement, the amount of such space has not been determined at this time. Therefore, it is concluded that a significant impact may occur regarding the provision of common open space, and a mitigation measure is recommend below, to require that the common open-space standard be met.

[139] *26.1 acres x 40 percent = 10.44 acres*

4. MITIGATION MEASURES

Two mitigation measures are proposed to address potential impacts on parks and recreation services. The first measure addresses impacts on public recreation facilities. Even though a significant impact on such facilities is not anticipated, the related measure ensures that the Project's contribution to parks and recreation facilities meets the City's Quimby requirements. The second measure addresses a potentially significant impact that could occur regarding the provision of private open space.

Mitigation Measure I.4-1: The Project shall provide park and recreation facilities pursuant to Section 9207.19, equivalent to three acres per 1,000 population, that would be met through the provision of park space, on-site improvements, and/or, the payment of in-lieu fees.

Mitigation Measure I.4-2: The Project shall meet the intent of Municipal Code Sections 9128.54 and 9128.15 through the provision of private open space as defined therein and/or the provision of additional amenities that meet the recreational needs of Project residents, e.g., health clubs.

Mitigation Measure I.4-3: The Project shall meet the requirements of Municipal Code Section 9126.28 by demonstrating that the Project's common open space area meets the 40% standard established therein.

5. CUMULATIVE IMPACTS

Section III.B of this Draft EIR provides a list of the related projects that have the potential to occur concurrent with the development of the proposed Project. Of the 36 related projects, 17 are residential in nature or contain a residential component (i.e., Related Project Nos. 2, 3, 8, 12-20, 23, 30, 33, and 35). A total of 609 dwelling units are anticipated to be constructed with implementation of the above-listed related projects; 163 single-family and 446 multiple-family units. Land dedication requirements for the related projects were calculated based on the land dedication factors set forth in the Carson Municipal Code for each dwelling unit type. To meet the current requirements set forth in Section 9207.19 of the Carson Municipal Code, roughly 5.6 acres of land would be required for dedication or in-lieu payments as applicable. In addition, the related projects would be subject to Carson Municipal Code Section 9126.28 with regard to the provision of open space. The application of the Municipal Code would avoid inconsistency with the adopted General Plan goals, policies and implementation measures, As each related project would comply with the requirements established in the Carson Municipal Code, the potential park and open space impacts of the related projects would be reduced to levels that are less than significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potential significant impacts to park and recreational facilities associated with the proposed Project, based on the maximum requirements established via the Carson Municipal Code, would be reduced to a less than significant level via compliance with Mitigation Measure I.4-1. A potentially significant impact with regard to the provision of private open space would be met through mitigation measure I.4-2. The potentially significant impact with regard to the provision of common open space would be reduced to a less than significant level via Mitigation Measure I.4-3. No identified significant impacts were identified regarding inconsistency with the adopted General Plan goals, policies and implementation measures, nor open space requirements established in the Municipal Code. Thus, the Project would meet the demand for services as addressed through those provisions. Therefore, potential impacts to park and recreational facilities attributable to the proposed Project would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
5. LIBRARIES

1. INTRODUCTION

This section addresses potential Project impacts on the facilities and services administered by the County of Los Angeles Public Library system. The analysis focuses on whether available library capacity is sufficient to accommodate the population growth generated by the proposed Project.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

The City of Carson is served by the County of Los Angeles Public Library (County Library) system. The County Library is a special fund department under the jurisdiction of the County Board of Supervisors. The County Library system is financed primarily by a dedicated share of property tax from its service area, with other revenues including a general fund contribution, a parcel tax, grants, and fees. Budgeted expenditures are $24.48 per capita for fiscal year 2003/04. Supplemental funds are raised by the Los Angeles County Public Library Foundation. The County Library serves 51 of 88 cities and most unincorporated areas in the County of Los Angeles.[140] The County Public Library belongs to the South State Cooperative Library System, and is an affiliate member of the Metropolitan Cooperative Library System (MCLS), an association of public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions.

b. Existing Conditions

The proposed Project is within the service area of the Carson Regional Library (Carson Library), a 33,112 square foot facility, located approximately 1.5 miles south of the Project site at 151 East Carson Street. The Carson Library service area includes the southern half of the City and nearby unincorporated areas of the County. Based on 2000 Census data, the current service population for the Library is 98,661. As shown in Table 65 on page 501, the Library is 33,112 square feet in size and employs 12 full-time staff and 24 part-time staff. The Carson Library has

[140] *Los Angeles County Public Library website, http://www.colapublib.org/about/info.html, accessed June 1, 2005.*

Table 65

Carson Regional Library Facilities

Staffing	Collection Size	Facility Size	Service Population	Hours of Operation
12 full time 24 part time	255,389	33,112 sq. ft.	98,661	10: 00 A.M. to 8:00 P.M. Mon. - Thurs, 10: 00 A.M. to 6:00 P.M. Fri, 10: 00 A.M. to 5:00 P.M. Sat, and 10: 00 A.M. to 1:00 P.M. Sun

[a] *County of Los Angeles Public Library*
Source: PCR Services Corporation.

a collection size of 255,389, consisting of items such as books, audio and video materials, DVD's, pamphlets, periodicals and government documents. Amenities offered at the Library include public access to the internet and online catalogs, CD-ROM workstations, a Government Services computer, a public meeting room, a Consumer Health Program and Services, a Homework Center, an Adult Literacy Center, pre-school storyhours, and a reader's advisory service.[141]

Other Los Angeles County libraries within five miles of the site that could potentially serve Project residents include the Victoria Park Library, the Lomita Library and the Gardena Mayme Dear Library. The Victoria Park Library is located approximately two miles northeast of the Project site at 17906 South Avalon Boulevard. The library is 4,580 square feet in size and presently has a collection of 42,215 library materials consisting of 37,834 books, 31 periodicals, 2,450 videos, CDs and 1,900 audio cassettes.[142] The Lomita Library is located to the southwest of the Project site at 24200 Narbonne Avenue in the City of Lomita and the Gardena Mayme Dear Library is located northwest of the Project site at 1731 W. Gardena Boulevard in the City of Gardena. The Lomita Library is 7,500 square feet in size, while the Gardena Mayme Dear Library has 16,439 square feet of floor area.

3. PROJECT IMPACTS

a. Methodology

The demand for library services is typically determined based on the size of the resident population a library serves. As increases in population result in the need for additional facility space and library materials, the impact of the Project on library services is based on the ability of

[141] *County of Los Angeles Public Library, Fax to PCR July 19, 2005.*

[142] *County of Los Angeles Public Library website, http://www.colapublib.org/libs/victoria/, accessed July 20, 2005.*

the existing or planned library facilities to serve the estimated residential population generated by the Project. The assessment of potential Project impacts on library facilities is determined based on the following steps: (1) identify the primary service library that would serve the Project site; (2) forecast the number of residents generated by the Project and; (3) estimate the Project's demand for library services and facilities. The analysis is limited to the Project's potential impacts on the Carson Library as the Project site has been identified by the County Library as being within its service boundaries.

b. Significance Thresholds

The proposed Project would have a significant impact on library services if the Project would generate a demand for library facilities or services that would exceed available resources.

c. Analysis of Project Impacts

(1) Project Impacts

The analysis of potential Project impacts on library services is based on the following planning guidelines established by the Los Angeles County Library system: 2.75 - 3.0 library items per capita; 2.5 reader seats, 2.0 meeting room seats (minimum of 75 seats), and 1.0 computer per 1,000 residents; 0.5 gross square feet per capita for facility space; and 1.0 standard size parking space for each 250 gross square feet of facility space.[143] These guidelines are applied to the projected increase in population attributable to the Project.

Based on County Library guidelines, the Carson Regional Library users are currently under served in terms of facility size and library material items, with approximately 0.34 square feet of facility space and 2.6 library items per capita, thereby, not meeting the County Library minimum guidelines of 0.5 square feet of facility space and 2.75 library items per capita. Therefore, any additional increase in the Library's service population would create a significant impact on its services and facilities. Currently, there are no immediate plans to improve or expand the Library.[144] The proposed Project is conservatively forecasted to generate a residential population of 6,969 persons. As shown in Table 66 on page 503, according to the County Library guidelines, the proposed Project would generate the need for 3,485 square feet of library facility space, 19,165 library collection items, 17 reader seats, 75 meeting room seats,[145] 7 public access computers, and 14 standard size parking spaces. Thus, without the incorporation of mitigation measures, the Project may have a potentially significant impact on library services as

[143] *County of Los Angeles Public Library, Fax to PCR August 25, 2005.*

[144] *County of Los Angeles Public Library, Fax to PCR July 19, 2005.*

[145] *Although the Project would only generate the need for 14 seats, a minimum of 75 seats are required as per County Library guidelines.*

Table 66

Library Facilities Required by the Proposed Project

Library Facilities	Guidelines	Project Resident Population	Resources Required
Facility Size	0.5 gross square foot per capita	6,969	3,485 square feet
Collection Size	2.75 items per capita	6,969	19,165 items
Reader Seating	2.5 seats per 1,000 persons	6.969	17 seats
Meeting Room Seating	2.0 seats per 1,000 persons	6.969	14 seats
Public Access Computers	1.0 per 1,000 persons	6.969	7 computers
Parking	1 space per 250 gross square feet	3,485 square feet	14 spaces

Source: PCR Services Corporation based on County of Los Angeles Public Library Guidelines, September 2005.

the use of the Library by the Project's residents would contribute further to the current over-utilization of the Library's services and facilities. The Project Applicant has proposed to pay a fair share contribution for library improvements to off-set its impacts on the Library.

4. MITIGATION MEASURES

Though the Project is not statutorily required to pay library developer fees, as the Project would have significant impacts on the County Library system, which utilizes developer fees to mitigate impacts within the unincorporated areas of Los Angeles County, the following mitigation measure will apply:

Mitigation Measure I.5-1: The Applicant shall pay a fair share contribution for the improvement of library facilities that are required to off-set impacts of the Project, subject to approval of the County of Los Angles Public Library.

5. CUMULATIVE IMPACTS

The related projects identified in Section III.B of this Draft EIR, would construct a total of 609 dwelling units within the City of Carson. As the service area for the Carson Regional Library is limited to the southern half of Carson and nearby unincorporated areas of the County, about half of these units are located both within the City of Carson and in the Carson Library service area. Based on the City's average household size of 3.59, these residential units would generate a total of roughly 1,077 residents.[146] As shown in Table 67 on page 504, the development of the related projects would create additional demand on the Carson Library's

[146] *2000 Census data*

Table 67

Library Facilities Required by Related Projects

Library Facilities	Guidelines	Related Projects Resident Population	Resources Required
Facility Size	0.5 gross square foot per capita	1,077	539 square feet
Collection Size	2.75 items per capita	1,077	2,962 items
Reader Seating	2.5 seats per 1,000 persons	1,077	3 seats
Meeting Room Seating	2.0 seats per 1,000 persons	1,077	2 seats
Public Access Computers	1.0 per 1,000 persons	1,077	1 computer
Parking	1 space per 250 gross square feet	539 square feet	2 spaces

Source: PCR Services Corporation based on County of Los Angeles Public Library Guidelines, September 2005.

facilities and services. With the addition of the proposed Project's estimated population of 6,969, there would be approximately 8,046 new residents in the City of Carson and within the Carson Library service area. As the Carson Library currently under serves its existing population, population growth attributable to the related projects in addition to population growth associated with the proposed Project would cause the Carson Regional Library to further exceed the County guidelines for the provision of library facilities. In sum, the combined residential population would create the need for an additional 4,023 square feet of facility space, 22,127 library material items, 20 reader seats, 16 meeting room seats, 8 computers, and 16 parking spaces. Thus, the development of the identified related projects would result in a significant impact on library services due to lack of available capacity to meet the demand for library services. As the Project would off-set its impacts through the fair share payment of fees, the Project would not contribute to a significant cumulative impact on library services. Notwithstanding, since the extent to which other projects would off-set their impacts is unknown, it is conservatively concluded that the impacts of the identified related projects on library services would be significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Through the voluntary payment of fees, Project impacts would be reduced to a less than significant level.