
IV. ENVIRONMENTAL IMPACT ANALYSIS
K. PUBLIC SERVICES
1. POLICE SERVICES

ENVIRONMENTAL SETTING

Inglewood Police Department

The Inglewood Police Department (IPD) is the local law enforcement agency responsible for providing police protection service to the Proposed Project Site and immediate project vicinity. The City is divided into four geographical police beats. Beat 1 consists of the portion of Inglewood north of Manchester Boulevard and west of Prairie Avenue and Florence Avenue. Beat 2 has jurisdiction in Inglewood south of Manchester Boulevard and west of Prairie Avenue. Beat 3 consists of the portion of Inglewood north of Century Boulevard and east of Prairie Avenue. Beat 4 consists of the portion of Inglewood south of Century Boulevard and east of Prairie Avenue. The Project Site is within the boundaries of Beat 3 as depicted in Figure IV.K-1.

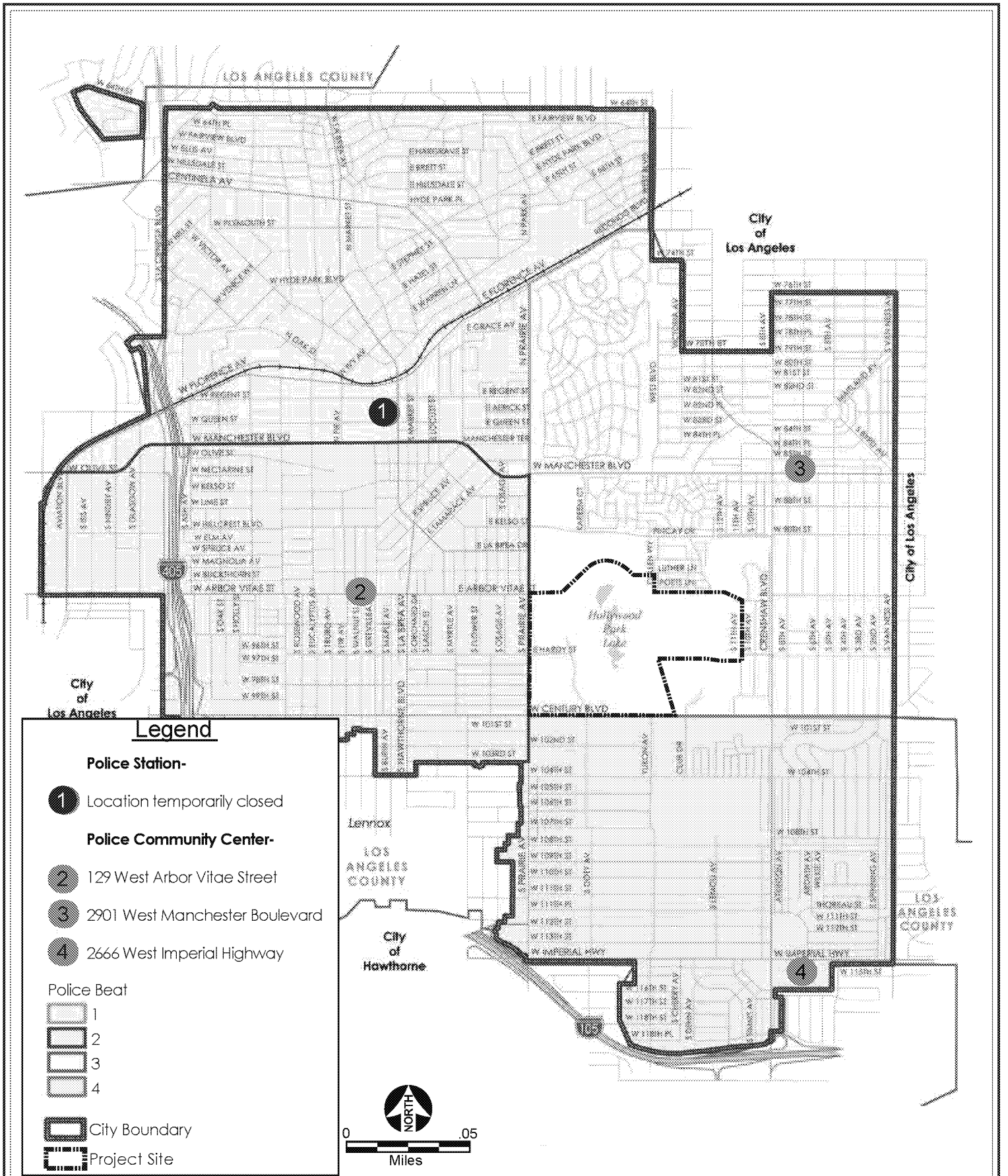
Crime Analysis

The Police Department's Crime Analysis Unit, based on the Department's crime data base, supplied the following analysis:

The Project Site is located in Police Reporting District (RD) 27, which consists of Hollywood Park Race Track and a Pavilion/Casino. RD 27 is bordered by Prairie Avenue to the west, 90th Street to the north, Century Boulevard to the south and the stable area east of the race track. The surrounding residential areas east of the site (including Darby Park) are located in RD 26.

In 2006, 3,987 Part I crimes, (arson, assault, auto theft, burglary, homicides, rape, robbery, theft) were reported Citywide. In 2006, 14 Part I crimes (excluding arson) were reported in RD 26 and 50 Part I crimes were reported in RD 27 with larceny and auto theft as the leading crimes. From January 1, 2007 to September 30, 2007, 2,973 Part I crimes were reported citywide. From January 1, 2007 to November 18, 2007, 27 Part I crimes were reported in RD 26 and 34 Part I crimes were reported in RD 27 with larceny and auto theft as the leading crimes.

Table IV.K-1 provides crime statistics for the City of Inglewood for the years 2005 and 2006. As the table demonstrates, the overall crime rate has generally decreased by 7 percent over the past year citywide. There were approximately 3,982 crimes reported in 2006, compared to 4,259 crimes reported during 2005. While the City has experienced a decrease in crimes classified as rape, robbery, burglary, and larceny, crimes classified as homicides and auto theft have increased by 38 and 15 percent, respectively.



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 6.6-1.



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Figure IV.K-1
City of Inglewood Police Service Area
And Police Station Location Map

**Table IV.K-1
City of Inglewood Crime Statistics**

Type of Crime	City of Inglewood		
	Year 2005	Year 2006	% Change From 2005
Homicide	26	36	38%
Rape	47	36	-23%
Robbery	556	481	-13%
Aggravated Assaults	434	502	16%
Burglary	821	675	-18%
Larceny (Theft)	1,452	1,194	-18%
Auto Theft	923	1,058	15%
Total	4,259	3,982	-7%

Source: City of Inglewood, California Crime Summary December 2006, website: <http://www.cityofinglewood.org/civica/filebank/blobdload.asp?BlobID=3928> (March 12, 2007)

Police Personnel Analysis

The Inglewood Police Department is authorized for 213 sworn and 92 full-time non-sworn positions. Currently, the Police Department employs 187 sworn officers (including all services under the Department Bureaus) and 79 full-time civilian employees. There are no Police Reserves at this time.

Based on current City/County population and housing estimates provided by the California Department of Finance Demographic Research Unit, the City of Inglewood had a resident population of 118,878 persons. Based on the number of authorized sworn officers, this equates to a service ratio of approximately 1.8 officers per 1,000 inhabitants. When compared to the number of employed officers currently maintained by the IPD, the service ratio is approximately 1.6 officers per 1,000 inhabitants. Per the Department of Justice, the current national ratio of full-time law enforcement officers is 2.4 per 1,000 inhabitants for a population of more than 100,000.¹ Thus, the level of law enforcement officers for the City of Inglewood reflects a ratio that is considerably lower than the national 2.4 mean ratio.

Response Times

The IPD does not set a minimum service ratio, and additions to the Police Department are made at the recommendation of department heads on an as-needed basis. Between January 1, 2005 and December 1, 2005, the average emergency response times were as follows: 6.47 minutes for morning watch, 7.48 minutes for day watch, and 6.80 minutes for evening watch. Between January 1, 2005 and December 1, 2005, the average non-emergency response times were as follows: 8.43 minutes for morning watch, 10.02

¹ U.S. Uniform Crime Reports, 2006, Department of Justice, Police Employees.

minutes for day watch, and 9.97 minutes for evening watch. These response times were considered acceptable for the Police Department.²

ENVIRONMENTAL IMPACT

Methodology

Impacts upon police protection services have been evaluated in consultation with the IPD. The following analysis is based on citywide statistics and information contained in the City of Inglewood General Plan Update Technical Background Report, August 2006, recent demographic statistics provided by the State of California Department of Finance, and written correspondence provided by Jacqueline Seabrooks, Chief of Police, IPD, dated November 29, 2007. The determination of impacts upon police services is based on an assessment of the current staffing levels within the IPD, the current and historic crime rates within the City, the incorporation of crime prevention design features in the project design, and the IPD's determination regarding their ability to provide adequate police protection service to the project.

The IPD's assessment of project impacts was based on the following Crime Prevention Through Environmental Design (CPTED) concepts:

- (1) Surveillance: Involves the location and use of physical features, electrical and mechanical devices to enhance visibility by the public. It creates a risk of detection for intruders and offenders and a perception of safety for legitimate users.
- (2) Access and Control: Employs measures to create a perception of risk to offenders and deny them access to targets; guides legitimate users safely through the environment.
- (3) Territoriality: Uses physical features and activities to express ownership and control of the environment. Discourages presence of outsiders by delineating private and semi-private spaces, controlling the movement of people and vehicles and making one responsible for maintaining all spaces in the area.
- (4) Target Hardening and Maintenance: Accomplished by features that prohibit unauthorized entry or access, such as window locks, deadbolts, alarm systems and access controls.

Evaluation of Demand For Police Services

The following Three-D Approach is one of the CPTED's usage concepts to determine if this Project Site would result in any impacts to public services, such as police protection, and whether the proposed development would be adequately served by current police protection service levels.

1. Designation: What is the intended use of the area and what behavior is allowed? For example, if a space has no designated purpose or is poorly defined or is not properly

² 6.6 Police Services, City of Inglewood General Plan Update Technical Background Report, August 2006.

- designated to support and control the intended function, that space may generate crime and fear.
2. Definition: What are the physical limits of the area? What are the borders between this area and public spaces? Is it clear which activities are allowed where and what risk can be anticipated and planned for?
 3. Design: Does the physical environment support the intended use safely and efficiently?

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact could occur if a project were to:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

Impacts Determined to be Less Than Significant

No impacts associated with police services were identified in the Initial Study to be less than significant.

Project Impacts

Short-Term Construction Impacts

Construction sites can be sources of nuisances, providing hazards and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement. The construction of the Proposed Project would therefore present a potentially significant impact on police protection services. However, the Proposed Project would employ mitigation measures including erecting temporary fencing around the construction site to discourage trespassers and deploying roving security guards to monitor the construction site and deter any potential criminal activity. These mitigation measures would diminish the need for police services during construction of the Proposed Project and reduce the potentially significant impact to less than significant.

Access and circulation to the Project Site and on roadways surrounding the construction site could be adversely affected by construction activities such as delivery schedules and temporary road/lane closures for utility upgrades in the right-of-way. As discussed in Section IV.L, Traffic/Transportation, construction of the Proposed Project would have the potential to create some traffic impacts in the vicinity of the Project Site. Generally, construction workers would be expected to arrive and depart the site outside of the normal peak hours, i.e., during off-peak hours. They would typically arrive at 7:00 a.m., (before the a.m. peak hour) and depart around 3:00 or 3:30 p.m. (before the evening peak hour).

The impact of construction worker trips on the a.m. peak hour and p.m. peak hour traffic is therefore expected to be negligible.

Construction truck traffic is expected to be distributed more evenly across the workday. Roadway improvements and utility upgrades under Century Boulevard and Prairie Avenue would require temporary and partial lane closures, which would have the potential to reduce emergency response times in the surrounding area. While temporary closures would be necessary for utility relocations, for delivery of materials, or for certain construction procedures, extended traffic lane closures are not expected. Nevertheless, in order to mitigate the potential temporary and short-term traffic impacts of any temporary lane and/or sidewalk closures during the construction period, a Construction Traffic Control/Management Plan would be developed to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. Implementation of this mitigation measure would serve to reduce any potential construction traffic impacts to a less than significant level.

Operational Impacts

The Proposed Project would increase the level of activity on-site and would create additional demands upon the IPD. As discussed in Section IV.H, Population, Housing and Employment, the Proposed Project would introduce a net increase of approximately 8,985 new residents to the Project Site. This Project-related increase in persons on the Project Site represents approximately 7.5 percent increase to the total existing residential population of the City of Inglewood. Based on the current officer-to-inhabitant ratio that the IPD maintains (i.e., 1.6 officers per 1,000 inhabitants), the Proposed Project would generate a need for 14 new police officers. As compared to the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), the project would generate a demand for 16 new police officers. It is anticipated that the demand for the additional staffing of 14 to 16 new police officers would be met through the increase in property tax and retail sales tax revenue that would be generated by the Proposed Project. While it is anticipated that the Proposed Project's increase in tax revenue is adequate to meet this demand, the exact allocation of funding for IPD's services would, however, be determined by the City on an annual basis during its annual budget allocation process.

In addition, based on an average 2 car garage per 2,995 units, approximately 5,990 vehicles would be generated on-site which would create a substantial increase in population and vehicles. While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls requesting police responses to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in onsite activity and increase in traffic on adjacent streets and arterials.

A potentially significant impact could occur if emergency services, such as fire and police, could not adequately serve the Project Site based upon response time, access, parking availability/circulation, and the Department's current decrease in police personnel.

A potentially significant impact may occur if the Proposed Project generates substantial population growth and demand for construction of school services. Additional school facilities would generate a demand for police services related to juvenile crimes (truancy, vandalism, and graffiti).

The Proposed Project will include an on-site police substation to be manned and operated by IPD personnel during the operating hours of the proposed retail uses. Further, the on-site IPD services will be supplemented with private security officers in an effort to provide a continuous security presence to the Project Site and surrounding neighborhood.

To further reduce the potential for increasing the demands upon police services in the area, the Proposed Project would include strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security would be controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention design features, such as nighttime security lighting, full-time onsite professional security, building security systems, and secure parking facilities (see security plan discussion, below). In addition, the continuous visible and non-visible presence of residents and employees at all times of the day would provide a sense of security during evening and early morning hours.

As part of the Proposed Project, a police substation operated by the IPD and an on-site security plan would be conceived and implemented by the Applicant in consultation with the IPD to minimize the potential for on-site crime and reduce demands upon additional IPD services. While a security plan has not yet been finalized, such a plan would be required as a condition of project approval and would be developed in consultation with the IPD Crime Prevention Unit (CPU) as part of the final plot plan review process. Such a security plan may include some or all of the following components:

- Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be arranged to provide a 24-hour presence.
- Commercial parking areas shall be fitted with emergency features such as emergency call boxes that will provide a direct connection with the on-site security force or the IPD 911 emergency response system.
- For those areas that are proposed for general public access, the park and open space areas shall be maintained by the Home Owners Associations (HOA) with public access during daylight hours only.
- Low-level and directional security lighting features shall be provided to illuminate entryways, seating areas, lobbies, elevators, locker rooms, service areas, and parking areas with good illumination to minimize dead space, and to eliminate areas of concealment.

Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's Circulation Plan. There would be no changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project.

As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel/residential would alter the site uses, and therefore, the size of the site's resident population and employment characteristics. In Maximum Housing Scenarios 1, 2 and 3, the exchange of land uses has the effect of increasing resident population and lowering the number of employees that could occur on the Project Site. Under the Maximum Retail and Maximum Hotel scenarios, the exchange of land uses yields the same resident population as the Proposed Project but a decrease in the number of employees on the Project Site. Under the Maximum Office/Commercial scenario, the exchange of land uses yields the same resident population as the Proposed Project but an increase in the number of employees on the Project Site.

Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in resident population, the application of the Equivalency Program may generate higher demand for police services than compared to the Proposed Project. While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls requesting police responses to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase under the Equivalency Program.

In terms of measuring police service ratios, employing the City's authorized standard of service ratio of 1.8 officers per 1,000 residents that was used in the above analysis, the number of officers would increase by 3 under Maximum Housing 1, 2 and 3. It is anticipated that the demand for these 3 additional officers would be met through the increase in property tax and retail sales tax revenue that would be generated by the Project. While it is anticipated that the Equivalency Program's increase in tax revenue is adequate to meet this demand, the exact allocation of funding for IPD's services would, however, be determined by the City on an annual basis during its annual budget allocation process. As such, impacts upon police services would be mitigated in proportion to the demands that are created by the project through tax revenue financing and the City's annual budget process.

Construction related impacts under the Equivalency Program would also be comparable to the Proposed project as levels of construction activity and traffic would also be comparable. Therefore, as is the case with the Proposed Project, the construction-related impacts to police services would be less than significant when appropriate mitigation measures are implemented.

With respect to operations phase, the Land Use Equivalency Program as with the Proposed Project, would not significantly alter the response distance or emergency access since the Equivalency Program is self-contained within the Hollywood Park Specific Plan Area. A potential significant impact could occur if emergency services could not adequately serve the Project Site based on response time, access, parking availability/circulation, and the IPD's current decrease in police personnel.

A potentially significant impact may occur if the Equivalency Program generates substantial population growth and demand for construction of school services. Additional school facilities would generate a demand for police services related to juvenile crimes.

All of the recommended project design features and mitigation measures to minimize potential impacts on police protection services under the Proposed Project would be applicable to the Equivalency Program. As noted above, development under the Equivalency Program would include the same site accessibility and safety features as the Proposed Project. As noted above, the Maximum Housing 1, 2 and 3 scenarios would slightly increase the demand for police services. The Equivalency Program would generate additional revenues to the City which could be applied towards the provision of staffing requirements. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the decision-makers.

CUMULATIVE IMPACTS

The Proposed Project, in combination with ambient growth and the 39 related projects (see Section III, Related Projects), would increase the demand for police protection services in the City. The City of Inglewood has an existing police service population of approximately 118,878 persons.³ As discussed in Section IV.H, Population, Housing and Employment, the Proposed Project, in conjunction with the 39 related projects located within the City of Inglewood, are estimated to generate a permanent population increase of 12,480 persons. This estimate could increase to approximately 13,995 persons under the three proposed Equivalency Program scenarios that maximize the project's housing potential to 3,500 dwelling units. Thus, under the worst case scenario, the Proposed Project combined with the 39 related projects would result in a 13,995 person cumulative increase in the police service population in the City, of which the Proposed Project would comprise approximately 75 percent.

The cumulative increase of 12,480 to 13,995 persons in terms of police service population may require additional officers to maintain the City's approved ratio of 1.8 officers per 1,000 civilians. Under this growth scenario, future development in the City could generate a demand for 22 to 25 new police officers. However, any new or expanded police station or additional police officers would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the Proposed Project and related projects would contribute. In addition, similar to the Proposed Project, each of the related projects would be individually subject to IPD review, and would be required to comply with all applicable safety requirements of the IPD and the City of Inglewood in order to adequately address police protection

³ California Department of Finance Demographic Research Unit.

service demands. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development. In addition, the Proposed Project and most of the related projects include infill development, which would revitalize the City of Inglewood. Ongoing revitalization efforts would help reduce the cumulative crime impacts within the City. Therefore, cumulative impacts on police protection services would be less than significant.

PROJECT DESIGN FEATURES

The following PDF's are proposed to be incorporated into the project description and were used in the basis for formulating portions of the environmental analysis with respect to police services. As such, it is recommended that the lead agency incorporate the following PDFs as conditions of project approval.

PDF K 1-1. The Proposed Project includes the construction of a police substation within the mixed-use land use designation area.

PDF K 1-2. As part of the Specific Plan Plot Plan review process, a Security Plan detailing measures that will be implemented to provide adequate security both within the interior and exterior of the premises will be submitted for review and approval.

MITIGATION MEASURES

To ensure that potentially significant project impacts to police protection services would be less than significant; the following mitigation measures would be implemented as part of the Proposed Project:

Construction Mitigation Measures

MM K 1-1. Prior to construction the Applicant shall prepare a Construction Security and Safety Management Plan that provides for the following safety features to be implemented and maintained throughout the construction period:

- (a) The Project Contractor(s) shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers.
- (b) The Project Contractor(s) shall employ security lighting to deter any potential criminal activity. Construction materials should not be accessible to the public during non-construction hours.
- (c) Detour or other signs should be clearly marked, positioned and secured.
- (d) All open hazardous areas, such as trenches, must be secured.
- (e) All discarded debris should be secured during construction.
- (f) A private security service shall patrol the site during non-construction hours.

MM K 1-2. Prior to construction, the Applicant shall prepare a Construction Traffic Control/Management Plan to minimize the effects of construction on vehicular and pedestrian circulation in the area of the Project Site.

Operational Mitigation Measures

MM K 1-3. The Project Applicant shall file all building plans with the Inglewood Police Department. Plans shall include access routes, floor plans, and any other additional information that might facilitate prompt and efficient police response.

MM K 1-4. The Project Applicant shall install alarms and or/locked doors on doorways providing public access to commercial facilities.

MM K 1-5. The Project Applicant shall develop and implement a Security Plan in consultation with the IPD, outlining the security services and features to be provided in conjunction with the Proposed Project. The plan shall be coordinated with the IPD and a copy of said plan shall be filed with the IPD. Said security plan may include some or all of the following components:

(a) Surveillance.

(b) Landscaping:

- Low growing plants (thorny) under windows of commercial buildings excluding retail windows/storefronts.
- Limit shrubbery to a maximum height of 2-3 feet near windows and entrances.
- Trees should be thinned on top and width to allow natural and security lighting through them, discourage concealment, and maximize public / police visibility.
- Trees should not be adjacent to roofs or wall areas that can act as a natural ladder for burglars.
- Placements of substantial low barriers, such as evergreen hedges, can be used to create more formidable obstacles to potentially vulnerable areas and be part of Territoriality reinforcement and natural Access Control.
- Use open landscaping and see-through fencing instead (when applicable) of solid walls for boundaries where privacy or environmental noise mitigation is not needed.

(c) Lighting:

- In addition to appropriate Project Site lighting, include appropriate lighting on parking areas, sidewalks / streets, pedestrian paths.
- Light should be consistent to reduce contrast between shadows and to illuminate areas to discourage concealment.
- Lighting should not be blocked by trees or other landscaping.
- All lighting fixtures should include appropriate vandal-proof protective grating covering.
- Consider metal H.I.D. (High Intensity Discharge), metal halide wall packs and landscape down lights for energy costs, whiter lighting and safety features.

(d) Physical Security:

- Commercial windows and doors should not be obstructed by signs, displays, plants, etc., (other than signs typically associated with retail uses) in order to provide maximum visibility for police and public observations.
- Use open or see-through structures for exterior stairways, walkways, sitting areas, parking spaces, etc.
- Eliminate potential hiding or entrapment spots.
- Locate ATM's, pay phones and bike racks in well-lighted and visible areas to the public.
- Where appropriate, install emergency phones, alarms or intercoms in convenient locations for public assistance.
- Do not place heavy objects (trash and cigarette containers) near exterior glass ingresses as they can be used against the glass to gain entry.
- Locate ATM's in front of banks or well-lit and visible public areas.

(e) Access Control:

- Control or eliminate public access to warehouse, storage and service areas.
- Control and monitor employee keys, entry cards or access codes.
- Make signs legible and unambiguous. Use symbol signs where possible, to discourage access to dangerous areas, exits, emergency assistance, etc.

- Design addresses for emergency visibility and access locations. Businesses may consider roof addresses for emergency aerial personnel.
- Design public amenities to discourage misuse, such as shape benches to be comfortable for sitting, but not for sleeping. Roughen or install breaks in low walls, curbs and smooth surfaces to discourage skateboarding.
- Design curb blocks to each commercial parking lot space to discourage vehicle racing and gathering of unauthorized vehicles during closing hours.
- Install steel grating to any roof opening to deny criminal entry.
- Storage or trash areas should be secured at all times to reduce the potential for encampments, vandalism and subjects or employees to hide stolen items from the stores.
- Alarms, CCTV's, intrusion detectors and security guards can be based on the future identifications of commercial buildings.
- The use of planters can help control access to a semi-private outdoor dining area from a public area, such as a parking lot.

(f) Territoriality:

- Define clear boundaries to storage areas, private / public areas through signs, gates, landscaping and pavement treatment, such as tiles and cobblestones.
- Residential and commercial buildings should be marked and clearly visible on all sides and roofs with appropriate building identification and address numbers.
- Loading areas should not create dead-end alleys or blind spots.

(g) Target Hardening and Maintenance:

- Exterior door hardware should be a minimum of 40 inches from adjacent windows.
- Consider Astride covers for locks.
- Consider security film for windows to deter vandalism and graffiti.
- Avoid loose rocks in landscaping.

MM K 1-6. The Project Applicant shall implement an on-site security plan in consultation with the Inglewood Police Department to provide a safe and secure environment within the proposed parks. The parks shall be designed and constructed in a manner that eliminates dead spaces and concealed areas to the maximum extent feasible. Low-level directional security lighting shall be provided to increase visibility for security personnel and passers by.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With respect to CEQA Checklist Question (a), construction and operation of the Proposed Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered police protection facilities, the need for new or physically altered police protection facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. The Proposed Project includes the construction of a police substation within the mixed-use land use designation area of the Project. However, the construction of this substation is ancillary to the proposed development and would be located within a commercial mixed-use building that would otherwise be constructed with or without the police substation. Thus, while the construction of the police substation would contribute to the temporary air quality and noise impacts that are anticipated during the construction process, it would not by itself generate any significant environmental impacts.

The Project would generate increased demands for police protection services. However, implementation of the Project Design Features and mitigation measures identified above would reduce the project's impact to police services to a less than significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS
K. PUBLIC SERVICES
2. FIRE PROTECTION

ENVIRONMENTAL SETTING

Fire prevention, fire suppression, and life safety services are provided throughout the City of Inglewood by the Los Angeles County Fire Department (LACoFD), as governed by the Inglewood Municipal Code, which adopted the County of Los Angeles 2001 Fire Code (“Los Angeles County Fire Code”), the California Fire Plan, and the County Pre-Fire Management Plan (2004). The Plan and the Fire Code serve as guides to City Departments, government offices, developers, and the public for the of City of Inglewood.⁴ The LACoFD operates 9 divisions, 21 battalions, 165 fire stations and 10 fire suppression camps for 58 district cities within the County of Los Angeles. Their services include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A professionally trained staff of 1,253 firefighters (including 635 paramedic-trained personnel) is on duty at all times at 165 fire stations located across the LACoFD’s 2,305-square-mile jurisdiction.⁵

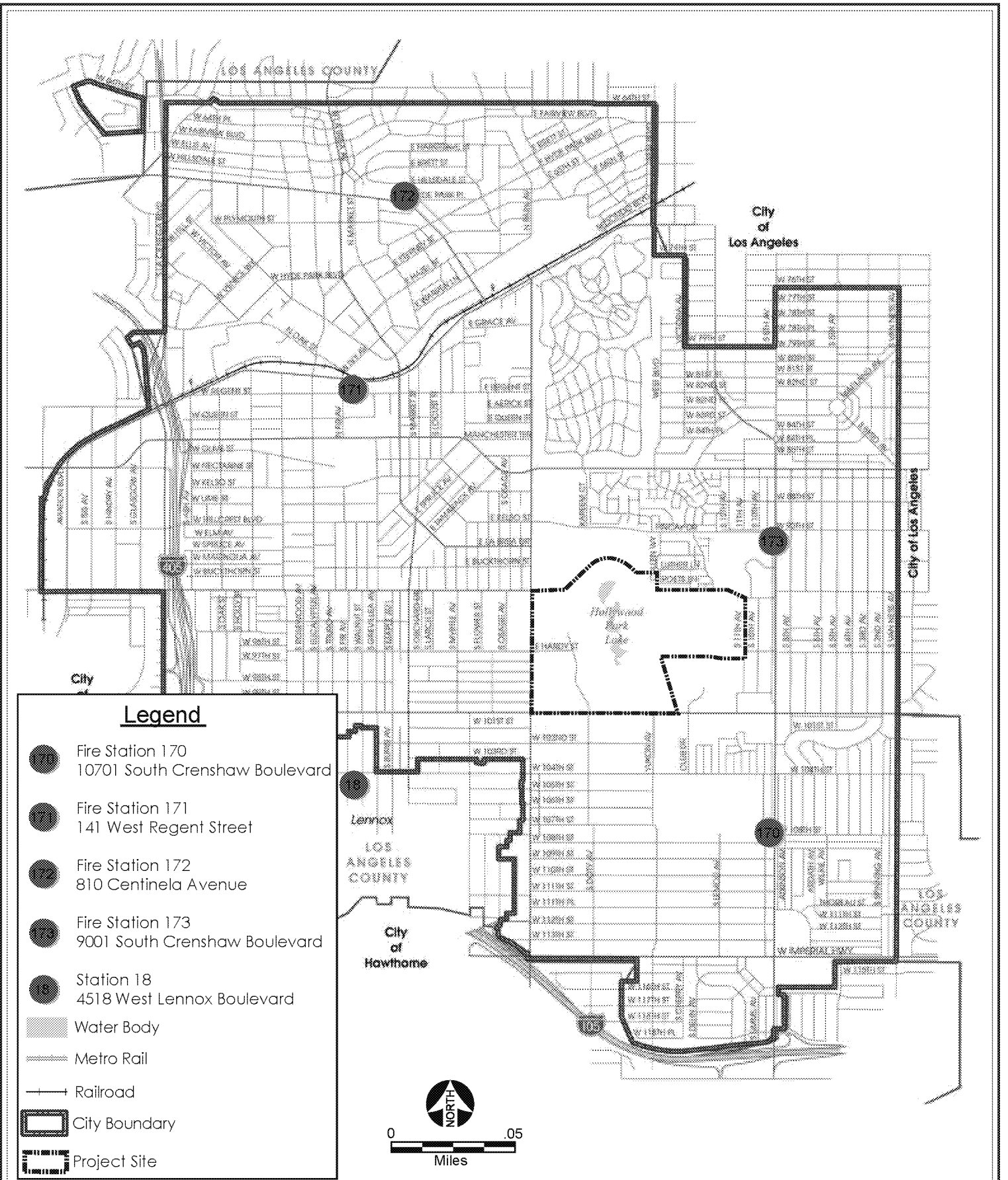
Fire Stations

The Proposed Project is located within Division VI, Battalion 20 of the LACoFD’s jurisdiction. As of March 2006, Battalion 20 employed approximately 75 full-time staff among the five fire stations within the City. Within Battalion 20 are six fire stations: Station 14, Station 18, Station 170, Station 171, Station 172, and Station 173. Fire Station 170 is located approximately 1.7 miles from the Project Site, Fire Station 171 is approximately 2.1 miles, Fire Station 172 is approximately 1.7 miles from the Project Site, and Fire Station 173 is located approximately 1.6 miles from the Project Site (see Figure IV.K-2).

Fire Station No. 173 is located approximately 1.6 miles from the Project Site (at 9001 South Crenshaw Boulevard) and would have primary response duties to calls from the Proposed Project. Fire Station No. 173 is equipped with a 3-person engine company and 2-person paramedic squad. Fire Station No. 170, located at 10701 S. Crenshaw Boulevard, Fire Station No. 171, located at 141 W. Regent Street, and Fire Station No. 172, located at 810 Centinela Avenue, are all equipped with a 3-person engine company and 2-person

⁴ Los Angeles County Fire Department, 2005 Statistical Summary website: <http://fire.lacounty.gov/PDFs/StatSummary.pdf>, March 12, 2007.

⁵ Los Angeles County Fire Department Pre-Fire Management Plan, website: <http://www.lacofd.org/Forestry/PDF/LACoFDPre-FireMgmt.pdf>, September 5, 2006.



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 6.7-1.



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Figure IV.K-2
Los Angeles County Fire Department
Fire Stations within the City of Inglewood

paramedic squad, and would also respond to calls from the Proposed Project. Although Station 18 is outside of City limits, it is equipped with a 4-person paramedic engine company and would be the closest unit available to service Inglewood if the need should arise.⁶

The LACoFD participates in automatic and mutual aid services with neighboring jurisdictions. Units from stations located outside of the City of Inglewood respond to calls on a daily basis. LACoFD emergency units are dispatched as needed to an incident anywhere in the LACoFD's service territory based on the distance and availability, without regard to the Inglewood city limits. Fire stations that also service Inglewood are located within the cities of Hawthorne, Gardena, and Lawndale, and within unincorporated communities of West Athens, Lennox, and Baldwin Hills. Additionally, the ability to manage and control major fires or other emergencies is enhanced by the Standardized Emergency Management System (SEMS).⁷ Therefore, there are plenty of resources available to respond to a large incidence or multiple simultaneous incidences in Inglewood without the need to request mutual aid from other fire protection agencies.

Response Time

Response time relates directly to the physical linear travel distance (i.e., miles between a fire station and a site) and the Fire Department's ability to successfully navigate the given accessways and adjunct circulation system. Roadway congestion and intersection level of service along the response route can affect the response distance when viewed in terms of travel time. The LACoFD uses nationally-accepted guidelines for response times in urban areas: 5 minutes for a first-responding or basic life support unit (usually an engine company) and 8 minutes for an advanced life support (paramedic) unit. In 2005, Inglewood had an average emergency response time of 4.4 minutes. The average non-emergency response time was 6.3 minutes.⁸

Fire Flow

The adequacy of fire protection for a given area is based on required fire flow, response time from existing fire stations, and the LACoFD's judgment for assessing the needs in a given area. The required fire flow is closely related to the type and size of the land use. In general, the required fire flow is closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). The LACoFD requirement for residential projects ranges from 1,250 gallons per minute (gpm) to 5,000 gpm depending on the density of the area; however, a minimum residual water pressure of 20 pounds per square inch (psi) is required. Specifically, high-density

⁶ 6.7 Fire Services, *City of Inglewood General Plan Update Technical Background Report, August 2006.*

⁷ *Ibid.*

⁸ *Response Times and Protocol, Fire Services, City of Inglewood General Plan Update Technical Background Report, August 2006.*

residential developments require fire flows up to 5,000 gpm at 20 psi for up to a five hour duration. Single-family dwelling units require fire flows up to 1,250 per minute at 20 psi for up to a two-hour duration. Institutional uses require a fire flow up to 8,000 gpm at 20 psi for up to a four hour duration. LACoFD requirements for commercial projects are 5,000 gpm with a minimum residual water pressure of 20 psi for up to a five-hour duration. As such, fire flows and fire hydrants would be provided for the Proposed Project as required by the LACoFD.

Water for fire flows for the area surrounding the Project Site is provided by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Refer to Section IV.J.1, Water Supply, for a complete discussion of water service infrastructure in the Proposed Project area.

ENVIRONMENTAL IMPACT

Methodology

Impacts upon fire protection services have been evaluated in consultation with the County of Los Angeles Fire Department. The following analysis is based on the written correspondence provided by John R. Todd, Chief of Forestry Division, Prevention Services Bureau of the County of Los Angeles Fire Department, dated September 5, 2007. The Proposed Project's potential to impact fire protection services is based on the current staffing and fire response equipment within the project's services area, fire flow, accessibility, the LACoFD's determination regarding their ability to provide adequate fire protection services to the Project.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to result in the following:

- (a) Substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the fire department.

Impacts Determined to be Less Than Significant

No impacts associated with fire protection services were identified in the Initial Study to be less than significant.

Project Impacts

Construction

Removal of the existing onsite buildings and construction of the Proposed Project could increase the potential for accidental onsite fires from such sources as the operation of mechanical equipment, the use of flammable construction materials, and the careless disposal of cigarettes. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during demolition and construction of the Proposed Project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur (see “Mitigation Measures” subheading below for a complete list of requirements).

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- (1) Construction impacts are temporary in nature and do not cause lasting effects; and
- (2) Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until construction is complete.

Project construction would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, construction-related impacts to fire protection services would be less than significant.

Operation

Implementation of the Proposed Project would increase the need for fire protection and emergency medical services in the Hollywood Park area. The following discussion analyzes the major criteria for determining the Proposed Project’s impacts on fire protection services.

Response Distance and Emergency Access

As discussed above, the nearest engine company is approximately 1.6 miles from the Project Site, and it would be 0.6 miles beyond the required response distance for structures not fitted with sprinkler systems. However, the nearest engine and truck companies are located approximately 1 mile from the Project Site, just within the maximum response distance. Nevertheless, due to the fact that the Proposed Project

includes the development of buildings above 75 feet in height (e.g. the hotel structure), automatic fire suppression sprinklers would be required by the Fire Code for these structures.

Emergency vehicle access to the Proposed Project Site would continue to be provided from local public roadways. Major roadways adjacent to the Project Site (i.e., Prairie Avenue and Century Boulevard) would continue to provide public and emergency access.

Fire Flow

Water service for fire fighting purposes would continue to be provided by the West Basin Municipal Water District (WBMWD). The existing water system would serve both domestic and firewater needs. As discussed above, the adequacy of fire protection for a given area is based on required fire flow; response time from existing fire stations, and the LACoFD's judgment for assessing the needs in a given area. The required fire flow is closely related to the type and size of the land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. County-established fire flow requirements, which are established in the Fire Code, vary from 1,250 gallons per minute (gpm) in low-density residential areas, to 5,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.⁹

In accordance with the LACoFD standards, fire flow availability tests were undertaken at the site by the City of Inglewood on December 11, 2006. The tests were to ascertain a fire flow at 20-psi for an excess of a 3-hour duration. The results were as follows:

- Century Bl. & Club Dr., 12-inch water main, static pressure 102-psi, residual pressure 98-psi, fire flow 6,009-gpm;
- Prairie Ave. & La Brea Dr., 10-inch water main, static pressure 75-psi, residual pressure 70-psi, fire flow 4,665-gpm; and
- Pincay & Prairie, 24-inch water main, static pressure 71-psi, residual pressure 67-psi, fire flow 5,139-gpm.

Based on these results, the Project Site is adequately served by the existing water infrastructure. The Proposed Project would be designed and developed to ensure adequate fire flow is maintained through buildout of the Proposed Project. Additional hydrants would be installed throughout the development per Fire Code requirements based upon the specific land uses to be introduced (i.e., multi-family residential, commercial, and parking uses). As such, impacts related to fire flow are anticipated to be less than significant.

⁹ *Fire Flow and Hydrant Requirements, Los Angeles County Fire Department, website: http://fire.lacounty.gov/FirePrevention/PDFs/Reg/fpr_ch7_8.pdf, accessed April 11, 2007.*

Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would not be substantial variation in the Project's Circulation Plan. There would not be changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project.

As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel/residential would alter the site uses, and therefore, the size of the site's resident population and employment characteristics. In Maximum Housing Scenarios 1, 2 and 3, the exchange of land uses has the effect of increasing resident population and lowering the number of employees that could occur on the Project Site. Under the Maximum Retail and Maximum Hotel scenarios, the exchange of land uses yields the same resident population as the Proposed Project but a decrease in the number of employees on the Project Site. Under the Maximum Office/Commercial scenario, the exchange of land uses yields the same resident population as the Proposed Project but an increase in the number of employees on the Project Site. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in population and the Maximum Office/Commercial scenario where there is a net increase in employment, the application of the Equivalency Program may generate higher demand for fire projection services than the Proposed Project.

Construction-related impacts under the Equivalency Program would also be comparable to the Proposed Project as levels of construction activity and traffic would also be comparable. Therefore, as is the case with the Proposed Project, the construction-related impacts to fire protection services would be less than significant.

With respect to response distance and emergency access during the operations phase, the Equivalency Program as with the Proposed Project, would not significantly alter the response distance or emergency access since the Equivalency Program is self-contained within the Hollywood Park Specific Plan Area. Emergency vehicle access under the Equivalency Program, as with the Proposed Project, would continue to access the Project Site from local public roadways. Major roadways adjacent to the Project Site would continue to provide public and emergency access.

With respect to Fire Flow during the operations phase, the Equivalency Program would yield similar results as under the Proposed Project (as described above). Based on those results, the Project under the Equivalency Program is adequately served by the existing water infrastructure. As such, impacts related to fire flow are anticipated to be less than significant under the Equivalency Program.

All of the recommended project design features and mitigation measures to minimize impacts on fire protection would be applicable to the Equivalency Program, as well as the Proposed Project. Like the Proposed Project, none of the Equivalency Scenarios would require the expansion, consolidation or

relocation of an existing facility to maintain service. As such, impacts to fire protection services under the Equivalency Program would be less than significant.

CUMULATIVE IMPACTS

The Proposed Project, in combination with the construction and operation of the related projects, would increase the demand for fire protection services in the Proposed Project area. Specifically, there would be increased demands for additional LACoFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, government funding), to which the Proposed Project and related projects would contribute.

Similar to the Proposed Project, each of the related projects would be individually subject to LACoFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LACoFD and the City of Inglewood in order to adequately mitigate fire protection impacts. For example, all related projects would be required to assure that LACoFD access remains clear during all demolition and construction activities. In addition, for any residential related project more than 1.5 miles from the nearest LACoFD Engine or Truck Company, or for any commercial related project more than one mile from an LACoFD Engine Company or 1.5 miles from an LACoFD Truck Company. Building code requirements would also ensure the installation of automatic fire sprinkler systems in public buildings, in order to compensate for the additional response distance. Therefore, the Proposed Project would not have a cumulatively considerable incremental effect upon fire protection services and the Proposed Project's cumulative impact would be less than significant.

PROJECT DESIGN FEATURES

No specific PDFs are proposed that are directly related to fire protection services.

MITIGATION MEASURES

Although significant impacts were not identified in the above analysis, the following mitigation measures are included to highlight the project features that allow for this conclusion, as well as further ensure that project impacts to fire protection services would be less than significant:

Construction Mitigation Measures

- MM K 2-1. Throughout the demolition and construction process, Fire Department access shall remain clear and unobstructed at all times.
- MM K 2-2. All Project Contractors shall implement good housekeeping procedures during demolition and construction of the Proposed Project, including maintaining mechanical equipment in good operating condition; proper storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Operational Mitigation Measures

- MM K 2-3. The Proposed Project shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flow and hydrants. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check.
- MM K 2-4. Final fire flows shall be determined by the Los Angeles County Fire Department. Fire flow of up to 5,000 gallons per minute (gpm) at 20 pounds per square inch residual pressure for a five-hour duration may be required or as determined based on building size, building relationships, proximity to property lines and types of construction.
- MM K 2-5. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
1. No portion of the lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 2. No portion of the building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
- MM K 2-6. Internal driveways and roadways shall be no less than 26 feet and shall contain an approved turning radii of no less than 32 feet, or as approved by the Los Angeles County Fire Department.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With respect to threshold (a), discussed above, the Proposed Project, including the Equivalency Program, would not result in any substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the fire department. Project impacts on fire protection service would be less than significant.

ENVIRONMENTAL IMPACT ANALYSIS

K. PUBLIC SERVICES

3. SCHOOL SERVICES

INTRODUCTION

This section addresses potential impacts of the Proposed Project on public schools. Under CEQA, the analysis of environmental impacts resulting from a development project should focus on the physical effects of a project, rather than the fiscal or socio-economic effects. Where a substantial increase in enrollment resulting from a project will necessitate the construction of new schools that will require school occupants to attend different schools, the physical impacts of these effects will be addressed by the EIR; examples of such impacts might include change to traffic patterns, change to vehicle miles traveled, hence a consequential change to air quality, and change to community noise levels. This section focuses on the physical changes associated with the Project's potential for student generation.

ENVIRONMENTAL SETTING

Public education services are provided within the project area by the Inglewood Unified School District (IUSD). The IUSD operates a total of twenty-one schools: ten elementary schools (K-6 or K-5), four K-8 schools, two middle schools, two high schools, and three small schools that provide continuation and adult education. Table IV.K-2, IUSD School Information lists the schools and their addresses. None of these schools are located within the Project site. However, according to IUSD attendance boundaries, the Project site is located within the Lane (Warren) Elementary (K-8) School attendance area and Morningside High School attendance area. These schools are located approximately 1 mile and 0.5 miles away from the Project Site.¹⁰

A location map of the 19 schools within the ISD is provided in Figure IV.K-3 on page IV.K-26. The ISD's elementary, middle and high school enrollment boundaries are identified in Figures IV.K-4 through IV.K-6 on pages IV.K-27 through IV.K-29, respectively.

¹⁰ Distance was taken from the corner of W. Century Blvd. and Yukon Ave.

**Table IV.K-2
IUSD School Information**

School	Grade Levels	Address
Bennett/Kew Elementary	K-5	11710 South Cherry Ave., Inglewood, CA 90303
Centinela Elementary	K-6	1123 Marlborough Ave., Inglewood, CA 90302
Freeman (Daniel) Elementary	K-6	2602 West 79 th St., Inglewood, CA 90305
Highland Elementary	K-5	430 Venice Way, Inglewood, CA 90302
Hudnall (Claude) Elementary	K-6	331 West Olive, Inglewood, CA 90301
Kelso (William H.) Elementary	K-5	809 East Kelso St., Inglewood, CA 91301
Oak Street Elementary	K-5	633 South Oak St., Inglewood, CA 90301
Payne (Buelah) Elementary	K-6	215 West 94 th St., Inglewood, CA 90301
Woodworth (Clyde) Elementary	K-6	3200 West 104 th St., Inglewood, CA 90303
Worthington Elementary	K-5	11101 Yukon Ave., Inglewood, CA 90303
Lane (Warren) Elementary	K-8	9330 South Eighth Ave., Inglewood, CA 90305
La Tijera	K-8	1415 North La Tijera Blvd., Inglewood, CA 90302
Parent (Frank D.) Elementary	K-8	5354 West 64 th St., Inglewood, CA 90302
Wilder's Preparatory Academy Chapter	K-8	830 North La Brea Ave., Inglewood, CA 90302
Crozier (George W.) Middle	6-8	151 North Grevillea Ave., Inglewood, CA 90301
Monroe (Albert F.) Middle	6-8	10711 Tenth Ave., Inglewood, CA 90303
Inglewood High	9-12	231 South Grevillea Ave., Inglewood, CA 90301
Morningside High	9-12	10500 South Yukon Ave., Inglewood, CA 90303

Source: Grade configuration and schools' addresses provided by California Department of Education, School Directory.

District-wide student enrollment at IUSD has declined by 14.8 percent in the last five years. Elementary school enrollment has declined by 18.5 percent. Middle and high schools enrollment has declined by 16.4 and 3.5 percent, respectively. Table IV.K-3, IUSD Enrollment for School Years 2003/04 through 2007/08, depicts closest schools to the Project and the District's steady decline in enrollment in the last five years. Table IV.K-4, IUSD Growth for School Years 2003/04 through 2007/08, provides the percent change in enrollment between each school year.



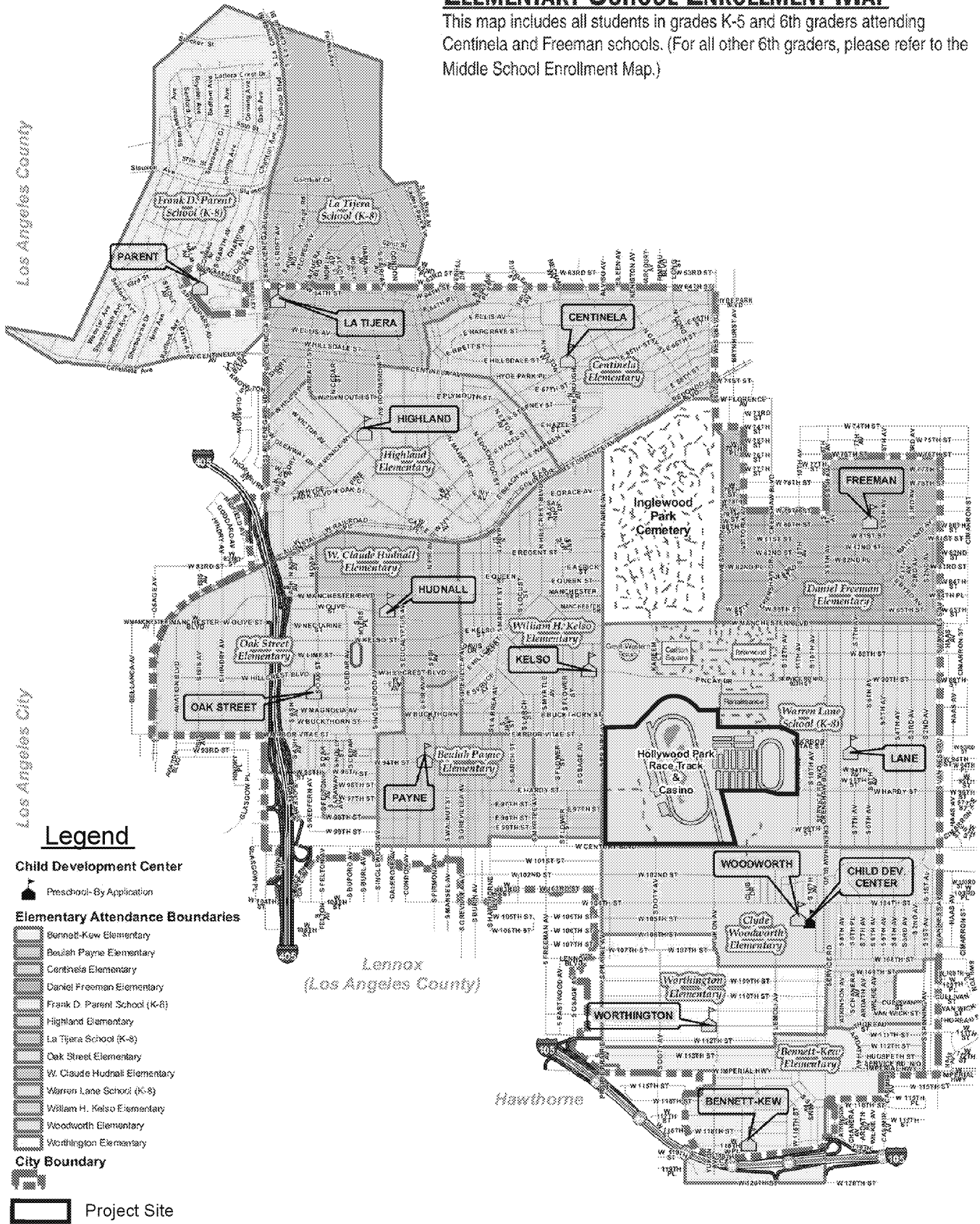
CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research



Figure IV.K-3
IUSD School Location Map

ELEMENTARY SCHOOL ENROLLMENT MAP

This map includes all students in grades K-5 and 6th graders attending Centinela and Freeman schools. (For all other 6th graders, please refer to the Middle School Enrollment Map.)



Legend

Child Development Center

Preschool - By Application

Elementary Attendance Boundaries

- Bennett-Kew Elementary
- Beulah Payne Elementary
- Centinela Elementary
- Daniel Freeman Elementary
- Frank D. Parent School (K-8)
- Highland Elementary
- La Tijera School (K-8)
- Oak Street Elementary
- W. Claude Hudnall Elementary
- Warren Lane School (K-8)
- William H. Kelso Elementary
- Woodworth Elementary
- Worthington Elementary

City Boundary

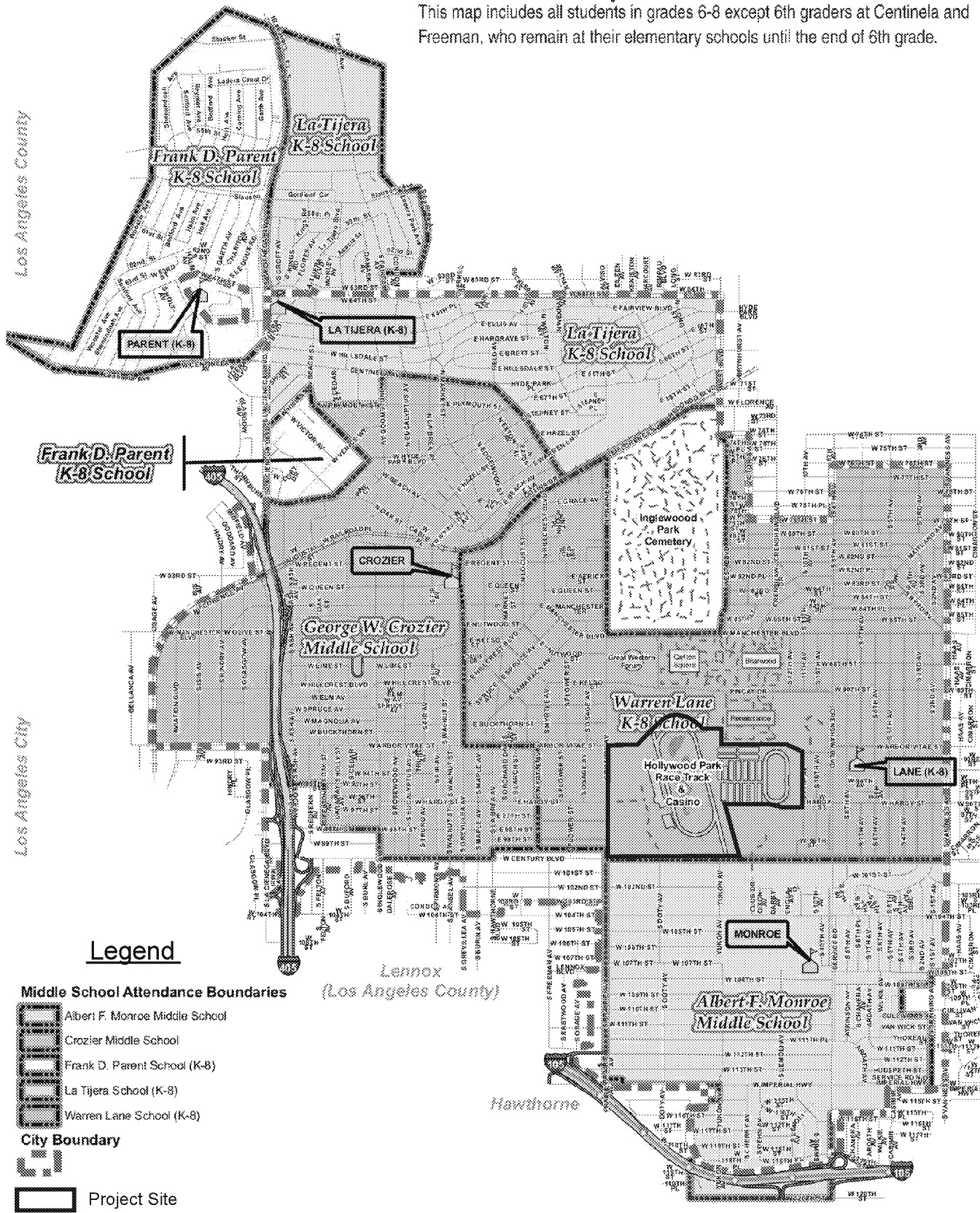
- Project Site

Source: Inglewood Unified School District, 2007.



MIDDLE SCHOOL / 6-8 ENROLLMENT MAP

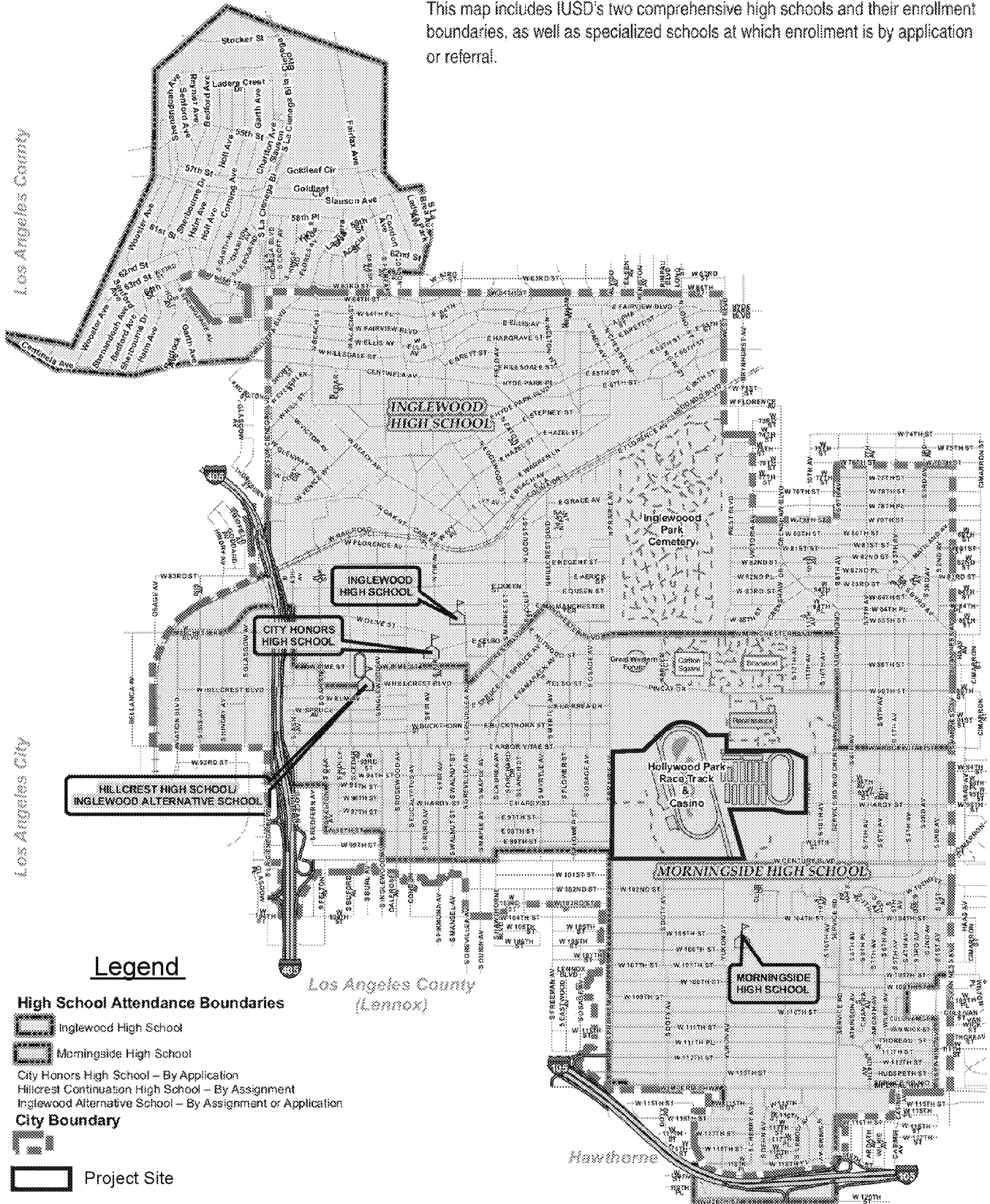
This map includes all students in grades 6-8 except 6th graders at Centinela and Freeman, who remain at their elementary schools until the end of 6th grade.



Source: Inglewood Unified School District, 2007.

HIGH SCHOOL ENROLLMENT MAP

This map includes IUSD's two comprehensive high schools and their enrollment boundaries, as well as specialized schools at which enrollment is by application or referral.



Source: Inglewood Unified School District, 2007.

Table IV.K-3
IUSD Closest Schools Enrollment for School Years 2003/04 Through 2007/08

	2007/08	2006/07	2005/06	2004/05	2003/04
Kelso Elementary School	783	778	789	797	841
Woodworth Elementary School	626	635	760	864	960
Lane Elementary (K-8) School	612	773	881	998	1,040
Monroe Middle School	1,120	1,148	1,186	1,268	1,364
Morningside High School	1,272	1,365	1,535	1,499	1,585
Inglewood USD	15,307	15,945	16,630	14,758	17,969

Source: Enrollments provided by California Department of Education, Educational Demographics Unit for the 2007/08, 2006/07, 2005/06, 2004/05, and 2003/04 school years.

Table IV.K-4
IUSD Closest Schools Growth for School Years 2003/04 through 2007/08

	2005/06 – 2006/07	2004/05 – 2005/06	2003/04 – 2004/05	2002/03 – 2003/04	2002/03 – 2006/07
Kelso Elementary School	0.6%	-1.4%	-1.0%	-5.2%	-6.9%
Woodworth Elementary School	-1.4%	-16.4%	-12.0%	-10.0%	-34.8%
Lane Elementary (K-8) School	-20.8%	-12.3%	-11.7%	-4.0%	-41.2%
Monroe Middle School	-2.4%	-3.2%	-6.5%	-7.0%	-17.9%
Morningside High School	-6.8%	-11.1%	2.4%	-5.4%	-19.7%
Inglewood USD	-4.0%	-4.1%	-4.7%	-2.8%	-14.8%

Source: Jeanette C. Justus Associates, May 2008.

According to IUSD,¹¹ there is a total of 10,527 elementary school, 2,698 middle school and 4,798 high school available seats. These numbers represent those seats in permanent and temporary (portable) classroom facilities. The State has a policy of accepting portable classrooms as capacity. When all portable classrooms are included in capacity calculations, adequate capacity is available at all grade levels at IUSD for the existing enrollment. Table IV.K-5, IUSD Closest Schools Capacity and Enrollment (Year 2007/08), provides 2007-08 school year enrollment and capacity district-wide (including existing portable classrooms) as well as for Project's closest schools.

¹¹ *Source: Developer Fee Justification Study & School Facilities Needs Analysis. 2006-07 Update to District's Master Plan. Inglewood Unified School District.*

**Table IV.K-5
IUSD Closest Schools Capacity and Enrollment (Year 2007/08)**

	Capacity	2007/08 Enrollment	Excess
Kelso Elementary School	808	783	25
Woodworth Elementary School	948	626	322
Lane Elementary (K-8) School	1,000	773	227
Monroe Middle School	1,566	1,120	446
Morningside High School	2,040	1,272	768
Inglewood USD	18,023	15,307	2,716
<i>Source: Enrollment provided by California Department of Education, Educational Demographics Unit for 2007/08 school year. Capacity provided by Developer Fee Justification Study & School Facilities Needs Analysis. Inglewood Unified School District. 2006-07 school year.</i>			

However, the state allows school districts to exclude some portable classrooms such as those leased for less than five years in determining state funding eligibility. IUSD excludes some portables from their capacity calculations.¹²

REGULATORY FRAMEWORK

Federal Level

Education is mostly regulated on the State and Local levels. However, the federal government is involved in providing funding for specialized programs. These monies are mandated for specific programs (i.e., school lunches/breakfasts, Title 1, Special Education) and are not used for general educational purposes. The discussions of state and local level regulations in the following sections provide information on the regulations most directly affecting the provision of education services in the area.

State Level

Funding

IUSD is under the jurisdiction of the State government and is subject to the regulations of the California Education Code and governance of the State Board of Education. School facility funds come from State funding, State bonds, local general obligation bonds, developer fees, and School Facility Improvement and Community Facilities Districts.

¹² *Source: Developer Fee Justification Study & School Facilities Needs Analysis. 2006-07 Update to District's Master Plan. Inglewood Unified School District.*

State Funding

Historically, the State has been responsible for passing legislation for the funding of public schools. To assist in providing school facilities to serve students generated by new development projects, the State passed Assembly Bill 2926 (AB 2926) in 1986. This bill allowed school districts to collect impact fees from developers of new residential and commercial/industrial building space. Development impact fees were also referenced in the 1987 Leroy Greene Lease-Purchase Act, which required school districts to contribute a matching share of costs for construction, modernization, and reconstruction projects.

Senate Bill 50 (SB 50), which passed in 1998, provided a comprehensive school facilities financing and reform program and enabled a bond issue to be placed on the ballot. The provisions of SB 50 allowed the state to offer funding to school districts in the form of grants to acquire school sites, construct new school facilities, and modernize existing school facilities. SB 50 also established a process for determining the amount of fees developers may be charged to mitigate the impact of development on school facilities. Under this reform, a school district could charge fees above the statutory cap only under specified conditions, and then only up to the amount of funds that the district would be eligible to receive from the state. According to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

SB 50 establishes three levels of Developer Fees that may be imposed upon new development by the governing board of a school district depending upon certain conditions within a district. These three levels are described as follows:

Level 1: Level 1 fees are the base statutory fees, also known as “developer fees.” These amounts are the maximum that can be legally imposed upon new construction projects by a school district unless the district qualifies for a higher level of funding.

Pursuant to the California Government Code Section 65995, as of January 2008, the statutory maximum Level I school fees that may be levied by a school district on new development was increased to \$2.97 per assessable square foot of residential construction and to \$0.47 per square foot of enclosed and covered space for commercial/industrial development.¹³ These rates are established by the State Allocation Board, who may increase the maximum fees according to the adjustment for inflation in the statewide cost index for Class B construction.

Level 2: Level 2 fees allow the school district to impose developer fees above the statutory level, up to 50 percent of new school construction costs. To implement Level 2 fees, the governing board of the school district must adopt a School Facilities Needs Analysis (SFNA), prepared in accordance with Government Code section 65995.6. The purpose of the SFNA is to determine the need for new school facilities

¹³ *The Office of Public School Construction defines Class B construction as buildings constructed primarily of reinforced concrete, steel frames, concrete floors, and roofs.*

attributable to growth from new residential development.¹⁴ The SFNA documents that the district has met prerequisite eligibility tests and calculates the fee per square foot of new development. If the School district is eligible for new construction funding, the State will match the 50 percent funding (if funds are available). According to the Office of Public School Construction, as of May 2008, state funds for new school construction are available.

- Level 3: Level 3 fees apply if the State runs out of bond funds, allowing the school district to impose 100 percent of the cost of the school facility or mitigation minus any local dedicated school moneys.

In accordance with SB 50, construction of new schools requires the school district to match (dollar for dollar) state funds. The local match is typically provided by developer fees, local general bonds, and property tax, such as School Facility Improvement District (SFID) or Mello-Roos Community Facility District, which is a “special tax” that can be levied on property owners of newly-constructed homes within a Community Facilities District. School districts may alternatively finance new schools through special school construction funding resolutions and/or agreements between developers, the affected school districts and occasionally, other local governmental agencies.

School Site Selection

The California Department of Education administers the selection of new school sites for public schools. Site selection is guided by requirements provided in School Site Selection and Approval Guide as well as the Education Code and the California Code of Regulations, Title 5 Section 14010 et seq. New schools sited within the Project area would meet the requirements set forth in the Public Resources Code Section 21151.8; Education Code Section 17213; and California Code of Regulations, Title 5, Sections 14011(h) and (i), and Title 14, Section 15093; as well as require the approval by the each district’s governing board and the California Department of Education.

School Size

The amount of land needed to support a school’s educational program would correspond to the school’s proposed programs, stated goals of the school district, as well as recommendations set by the California Department of Education. The California Department of Education has published the Guide to School Site Analysis and Development to assist in determining the amount of land needed to support schools.

Classroom Size

In addition to funding and school location and size, the State is also involved in deciding the structure of local schools. For instance, in August 1996, the State Senate passed SB 1777 (1996-1997 Class Size Reduction Program) and SB 1789 (Class Size Reduction Facilities Funding Program). These programs

¹⁴ Government Code Section 65995.6.

together provide incentive monies to the local school districts to lower class size for grades K-3 to a ratio of 20: 1 (students : teachers) and provide funds for additional teaching stations. However, the loading factor that the State uses to calculate school building capacity is 25 students per elementary classroom (K-5) and 27 students per middle and high school classroom (grades 6-12).¹⁵

Inter-district Transfers Regulation

According to state law (AB 149 and AB 2071), parents may elect to enroll their children in public school districts whose boundaries encompass the parent's place of work, rather than the parent's place of residence, and for the school district to consider such applications. The inter-district transfer program applies to kindergarten through middle school (i.e., grades K-8) students. School districts may refuse inter-district transfers. However, grounds for such refusals include findings that the requested transfer would be to a school district that is operating at full capacity, would negatively impact a district's desegregation plan or that the additional cost of educating a student would exceed the amount of additional state aid received as a result of the transfer. Districts cannot arbitrarily refuse transfers (e.g., on the basis of race, ethnicity, sex, parental income or scholastic achievement).

ENVIRONMENTAL IMPACTS

Methodology

The existing conditions of the public schools serving the Project area were assessed by utilizing information provided by IUSD and California Department of Education (CDE). The assessment addresses the potential impacts of the Project on the public school system only, as it is directly responsible (and mandated) to service new student populations generated from implementation of the proposed Project. Private institutions and higher education institutions are not evaluated since they are privately funded and not mandated to provide services; therefore, these schools are not discussed herein.

The methodology used in this analysis assumes that the number of new students generated from the Proposed Project is directly and indirectly related to the type and amount of the proposed Project's residential and commercial construction. The analysis of potential Project impacts on school facilities is based on the amount of Project development occurring within the attendance boundaries of each school. Where the existing capacity appears to be inadequate for Project-generated students, the analysis includes an evaluation of the sufficiency of the school sites for the addition of new classroom capacity to accommodate Project-generated students.

According to IUSD, the District applies state-wide student yield of 0.7 per unit to its new development projections regardless of the product type (i.e. single-family detached (SFD), single-family attached (SFA), multi-family (MF), and apartments).¹⁶ This rate is general, covers the entire state, and may not be

¹⁵ *School Facility Program Handbook, Office of Public School Construction, May 2008.*

¹⁶ *Source: Developer Fee Justification Study & School Facilities Needs Analysis. 2006-07 Update to District's Master Plan. Inglewood Unified School District.*

representative of the new development in local areas, including IUSD. In order to establish more representative student yield, the rates from Los Angeles Unified School District (LAUSD), an IUSD neighboring school district, were applied to the Project's residential dwelling units. In February 2008, LAUSD developed student generation rates (SGR) based on an estimate of 6,793 dwelling units. These rates provide a better reflection of the proposed development because they are based on an estimation of future new development over the next five years and are broken down into product types. Table IV.K-6, Pupil per Home Ratios, identifies the student generation rates by grade level and product type used in this chapter.

**Table IV.K-6
Pupil Per Home Ratios**

Product Type	Student Generation Rates			
	K-5	6-8	9-12	K-12
Single Family Detached	0.196	0.093	0.106	0.395
Single Family Attached	0.048	0.022	0.030	0.100
Multi-Family	0.170	0.095	0.086	0.351

Source: Residential Development School Fee Justification Studies. Los Angeles Unified School District. February 2008.

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant effect on the environment if the project would result in the following:

- (a) Substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or
- (b) The need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the school district.

Impacts Determined to be Less Than Significant

No impacts associated with school services were identified in the Initial Study to be less than significant.

Project Impacts

Construction Related Impacts

Construction activities have the potential to generate adverse impacts associated with respect to air quality, noise, traffic and public safety. As depicted in Figure IV.K-3, there are no public school sites

located immediately adjacent to the Project Site. The Proposed Project site is, however, within approximately ¼ mile (1,300 feet) of the following eight institutional sensitive receptors: (1) Inglewood Junior Academy located approximately 75 feet west of the project site; (2) William H. Kelso Elementary School located approximately 125 feet west of the project site; (3) Greater New Bethel Baptist Church located approximately 675 feet west of the project site; (4) Holy Trinity Evangelical Lutheran Church located approximately 850 feet east of the project site; (5) First Church of God located approximately 900 feet east of the project site; (6) Inglewood Southside Christian Church located approximately 1,100 feet south of the project site; (7) Centinela Hospital located approximately 1,100 feet west of the project site; and (8) Warren Lane Elementary School located approximately 1,175 feet east of the project site.

As discussed in Section IV.B, Air Quality, localized air quality impacts such as dust and PM₁₀ emissions are generally isolated to areas within 500 feet of active construction areas involving grading activities. The Proposed Project's construction-related activities would generate significant and unmitigatable regional and localized air quality impacts which would adversely impact all of the sensitive air quality receptors identified above.

As discussed in greater detail in Section IV.G, Noise, construction of the Proposed Project would require the use of heavy equipment for demolition, site grading and excavation, installation of utilities, paving, and building fabrication. With mitigation, construction-related ambient noise levels would generally range from 73.6 to 84.1 dBA Leq at sensitive receptors nearest to the Project Site. The City of Inglewood has not put forth specific construction noise level standards or limitations. Instead, the City regulates construction noise by limiting activity to the hours identified in the Noise Ordinance and would implement mitigation measures. Construction activity associated with the project would comply with the standards established in the Noise Ordinance. However, even with mitigation, construction noise levels would exceed the five dBA significance threshold at sensitive receptors near the Project Site. As such, construction activity would result in a significant and unavoidable short-term construction noise impact.

As discussed in greater detail in Section IV.L, Traffic and Transportation, construction of the Proposed Project would require the transport and use of heavy equipment, haul trucks, and generate other construction related traffic that could affect school pedestrian routes and or drop-off and pick-up routes. It is anticipated that the haul route for the Project would either be Century Boulevard westbound to access the I-405 Freeway or Prairie Avenue southbound to access the I-105 Freeway. As such, heavy equipment and hauling activities would not directly pass by any of the IUSD school sites.

In addition to the above, construction sites have the potential to attract and endanger school aged kids if the site is not adequately secured and monitored to prevent trespassers. Accordingly, the Proposed Project Site would be secured with perimeter fencing to deter trespassers and vandals to ensure a safe and secure environment. Implementation of precautionary mitigation measures listed below would ensure that any potential impacts to student safety would be minimized to a less than significant level. Therefore, the Proposed Project with respect to construction-related activities would result in a less than significant and unavoidable impact upon public school sites due to temporary construction noise.

Operational Impacts

The Project Site has no existing residential uses and therefore does not currently generate any students. As shown in Table IV.K-7, Estimated Student Generation by Proposed Project, the Proposed Project is anticipated to yield approximately 574 K-12 students, including 279 elementary school students, 137 middle school students, and 159 high school students. Table IV.K-7 provides the approximate student yield per product type.

**Table IV.K-7
Estimated Student Generation by Proposed Project**

Product Type	Units	Student Projections			
		K-5	6-8	9-12	K-12
Single Family Detached	675	132	63	72	267
Single Family Attached	2,020	96	45	61	202
Multi-Family	300	51	29	26	105
TOTAL	2,995	279	137	159	574
Classrooms^a		11	5	6	-

^a Classroom size is based on state standards of 25 students per elementary classroom and 27 students per middle and high school classrooms.

School Needs

The Proposed Project would generate students from grades Kindergarten through 12 that would need to be accommodated either at existing or new schools, as discussed below.

Existing Schools

Elementary Schools: Based on the existing school district boundary and school attendance areas, the 279 elementary school students generated from the Proposed Project would be required to attend Lane (Warren) K-8 School. Additionally, the projected students will be able to attend Kelso and Woodworth Elementary schools on a needed basis. These three schools are currently operating under capacity (Table IV.K-8, Closest Elementary Schools Capacity and Enrollment) and can accommodate the projected students. If the schools were to be expanded, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, they could be financed by State and local bond funds, as well as developer fees.¹⁷

¹⁷ Government Code Section 65995(h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

**Table IV.K-8
Closest Elementary Schools Capacity and Enrollment**

School	2006-07 Capacity	2007/08 Enrollment	Excess/(Shortage)
Kelso Elementary School	808	783	25
Woodworth Elementary School	948	626	322
Lane Elementary (K-8) School	1,000	773	227

Source: Enrollment provided by California Department of Education, Educational Demographics Unit for 2007/08 school year. Capacity provided by Developer Fee Justification Study & School Facilities Needs Analysis. Inglewood Unified School District. 2006-07 school year.

Secondary Schools: Both middle and high schools that would serve the project area are operating under capacity (Table IV.K-9, Middle and High School Capacity and Enrollment). Monroe Middle School would serve the projected 137 middle school students, and Morningside High would serve the projected 159 high school students. These schools are operating under capacity and it is anticipated that both schools could serve the incremental increase of middle and high school students. Expansion of the existing schools, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, can be financed by State and local bond funds, as well as developer fees.

**Table IV.K-9
Middle and High School Capacity and Enrollment**

School	2006-07 Capacity	2007/08 Enrollment	Excess/(Shortage)
Monroe Middle School	1,566	1,120	446
Morningside High School	2,040	1,272	768
Inglewood USD	18,023	15,307	2,716

Source: Enrollment provided by California Department of Education, Educational Demographics Unit for 2007/08 school year. Capacity provided by Developer Fee Justification Study & School Facilities Needs Analysis. Inglewood Unified School District. 2006-07 school year.

New Schools

While the student projections along with existing capacity do not indicate the need for a new school, the Proposed Project has a potential site that could be used to construct a school. The Applicant and IUSD are in the process of negotiations regarding the 4-acre site within the Project that is proposed be dedicated to public use. If the Applicant and the District do not reach an agreement, the site may be utilized by other public agencies.

School Finance

The Applicant and IUSD are discussing the possibility of a facility and financing program and mitigation agreement that would be mutually agreeable for all affected parties.¹⁸ Impacts associated with the increase in student enrollment at nearby schools resulting from the Proposed Project are being jointly evaluated. The Applicant will work with IUSD to ensure that any new school developed would be built in accordance to local and state standards and requirements and are available for all Project students. If no mitigation agreement is completed, the Applicant would be required to pay the adopted Developer Fees, which would fully and completely mitigate all school impacts.¹⁹ Therefore, impacts to school facilities would be less than significant.

Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site.

As shown in Table II-1, Land Use Program Equivalency Scenarios in Section II, Project Description, the exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in public school students generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the application of the Equivalency Program may generate higher demand for school services than compared to the Proposed Project. The resulting student generation from the Equivalency Program Maximum Housing scenarios is summarized in Table IV.K-10.

As shown in Table IV.K-10, Estimated Student Generation under the Proposed Equivalency Program is anticipated to yield approximately 625 K-12 students, including 303 elementary school students, 148 middle school students, and 174 high school students. Based on the existing school district boundary and school attendance areas, the 303 elementary school students generated under the Maximum Housing scenarios of the Equivalency Program would be required to attend Lane (Warren) K-8 School. Additionally, the projected students will be able to attend Kelso and Woodworth Elementary schools on a needed basis. These three schools are currently operating under capacity and can accommodate the projected students. If the schools were to be expanded, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, they could be financed by State and local bond funds, as well as developer fees.²⁰

¹⁸ Government Code Section 65995.7(c). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

¹⁹ Government Code Section 65995(h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

²⁰ Government Code Section 65995 (h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

Monroe Middle School would serve the projected 148 middle school students, and Morningside High would serve the projected 174 high school students. While these schools are operating under capacity, it is anticipated that both schools could serve the incremental increase of middle and high school students. Expansion of the existing schools, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, can be financed by State and local bond funds, as well as developer fees. As discussed above, the Applicant and IUSD are discussing the possibility of a facility and financing program and mitigation agreement that would be mutually agreeable for all affected parties. Impacts associated with the increase in student enrollment at nearby schools resulting from the Equivalency Program will be jointly evaluated. The Applicant will work with IUSD to ensure that any new school developed would be built in accordance to local and state standards and requirements and are available for all Project students. If no mitigation agreement is completed, the Applicant would be required to pay the adopted Developer Fees, which would fully and completely mitigate all school impacts. Therefore, impacts to school facilities under the Equivalency Program would be less than significant.

**Table IV.K-10
Estimated Student Generation Under the Proposed Land Use Equivalency Program**

Product Type	Units	Student Projections			
		K-5	6-8	9-12	K-12
Single Family Detached	675	132	63	72	267
Single Family Attached	2,525	120	56	77	253
Multi-Family	300	51	29	26	105
TOTAL	3,500	303	148	174	625
Classrooms^a		12	6	7	23

^a Classroom size is based on state standards of 25 students per elementary classroom and 27 students per middle and high school classrooms.

All of the recommended project design features and mitigation measures under the Proposed Project to minimize potential impacts on school services would be applicable to the Equivalency Program.

CUMULATIVE IMPACTS

All projects contribute incrementally to increases in student populations, either through the direct construction of new housing which is then occupied by school-age children or through the creation of new employment opportunities that may induce in-migration into a school district or allow young adults to leave home and form their own households. As school districts’ enrollment expands, school administrators seek both short-term and long-term remedies to accommodate these students by creating capacity at the existing schools or constructing new schools.

In recognition of these conditions, the State Legislature provided authority for school districts to assess impact fees for both residential and nonresidential development projects. Those fees, as authorized under Education Code Section 17620(a) and Government Code Section 65995(b), are collected by municipalities at the time building permits are issued and conveyed to the affected school district in accordance with a defined fee structure. Although those fees are seldom adequate to accommodate the true costs incurred by affected districts to construct new facilities, add additional teachers, and cover student costs, the Legislature has declared that the payment of those fees constitutes full mitigation for the impacts generated by new development.

Since all non-exempt projects must pay their appropriate impact fees, each project will mitigate the impacts associated with those activities. As a result, no cumulative impact upon local school districts is anticipated as a result of the implementation of the Hollywood Park.

PROJECT DESIGN FEATURES

PDF K 3-1. The Proposed Project includes a 4-acre public benefit parcel that will be offered to the City or other local public agency or organization as part of the Development Agreement. While the student projections along with existing capacity do not indicate the need for a new school, the Applicant and IUSD are in the process of negotiations regarding the 4-acre site within the Project that is proposed be made available for a public use. If the Applicant and the District do not reach an agreement, the 4-acre public benefit parcel may be utilized by other public agencies.

MITIGATION MEASURES

Construction-Related Mitigation Measures

- MM K 3-1. Prior to the start of project demolition, the Project Applicant shall prepare a Construction Management Plan approved by the Planning Department to ensure construction impacts to nearby school sites are minimized to the maximum extent feasible. The Construction Management Plan shall include the following:
- a. Project contractors shall maintain safe and convenient pedestrian routes to IUSD schools at all times. If necessary, the Project Contractor shall provide for crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
 - b. The Project Contractor shall maintain ongoing communication with school administration staff at affected schools, and shall provide sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
 - c. Staging or parking of construction-related vehicles, including worker-transport vehicles, shall not be allowed adjacent to school sites during school operating hours.

- d. The Project Contractor shall install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.

Operational Mitigation Measures

MM K 3-2. Pursuant to Government Code Section 65995, the Applicant shall pay the developer fees at the time building permits are issued; payment of the adopted fees would provide full and complete mitigation of school impacts. Alternatively, the Applicant may enter into a school finance agreement (Agreement) with the appropriate school district to address mitigation to school impacts in lieu of payment of developer fees. The Agreement shall be mutually satisfying and shall establish financing mechanisms for funding facilities to serve the students from the Project. If the Applicant and affected school district do not reach a mutually satisfying agreement, then project impacts would be subject to developer fees.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Pursuant to the California Education Code, the payment of development fees or dedication of land or improvements to a school site for purposes of school facilities funding as agreed upon by the developer, land owner, and the District shall be deemed acceptable to reduce a project's impact to a less than significant level. Therefore, with respect to threshold questions (a) and (b), the Proposed Project's impact upon schools would be less than significant.

IV. ENVIRONMENTAL IMPACT REPORT

K. PUBLIC SERVICES

4. PARKS AND RECREATION

ENVIRONMENTAL SETTING

The City of Inglewood Department of Parks, Recreation and Community Services manage all municipally owned and operated recreation and park facilities within the City. In 2002 the Department was reorganized to include Community Beautification Services, which supervised property maintenance, graffiti abatement, and municipal code enforcement throughout the City. The Department of Parks, Recreation, and Community Services manages approximately 89.6 acres of parkland within 11 recreation and open spaces areas. The facilities include 16 playgrounds, 18 tennis courts, 7 basketball courts, 1 volleyball court, 12 picnic areas, 8 play fields, 8 softball fields, 7 pools, 1 skatepark (plus one planned skatepark at Rogers Park) and 8 community/cultural centers. Given that the City is approximately 9.2 square miles in size, this provides approximately 0.8 acres of parkland per 1,000 residents.

The 1995 Open Space and Parks Element, a portion of the City's General Plan, provides standards for the provision of recreational facilities throughout the City and includes local recreation standards. The standard ratio of neighborhood and community parks identified in the 1995 Element cited the 1973 Open Space and Parks Element's adopted ratio of four acres per 1,000 people. It also cited that in 1972 the City's Community Review Program recommended an ambitious standard of seven acres per 1,000 people. Due to lack of undeveloped or underutilized land in Inglewood, and due to the high cost of acquiring and clearing properties that are already developed, the 1995 Open Space and Parks Element determined that the City may never achieve the standards advocated in 1972 and 1973. Instead, the 1995 Open Space and Parks Element recommended that the City strive for a more realistic and achievable standard, and re-establish the 1970 park/population ratio minimum threshold of one acre per 1,000 residents.²¹ The 1995 Open Space and Parks Element is the most recently adopted Element by the City, and therefore the recommended one acre per 1,000 residents is used to determine the Proposed Project's impacts on parks and recreation.

Within the City of Inglewood, 11 park and recreational facilities are located around or within its boundaries (see Figure IV.K-7 Parks and Recreation Centers). The facilities include: Ashwood Park, Center Park, Centinela Adobe, Circle Park, Darby Park, Grevillea Park, North Park, Queen Park, Rogers Park, Siminski Park, and Vincent Park (formerly Centinela Park). Lockhaven Community Center, located at 11117 Doty Avenue is approximately 13,000 sf and contains one playground and one community center, and is not identified as a park because it includes no open space. The name, addresses and size of the parks serving the Project area are provided in Table IV.K-11.

²¹ *City of Inglewood 1995 Open Space and Parks Element of the General Plan, pp.6- 7.*



Legend

- ① Ashwood Park
- ② Center Park
- ③ Centinela Adobe
- ④ Circle Park
- ⑤ Darby Park
- ⑥ Grevillea Park
- ⑦ North Park
- ⑧ Queen Park
- ⑨ Rogers Park
- ⑩ Siminski Park
- ⑪ Vincent Park

 Project Boundary



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 4.2-1.

**Table IV.K-11
Parks and Recreational Facilities Serving the Project Site**

Name	Address	Size (Acres)
Ashwood Park	201 South Ash Avenue	1.3
Center Park	3660 West 11 th Street	1.2
Centinela Adobe	7634 Midfield Avenue	1.0
Circle Park	8300 Fifth Avenue	1.3
Darby Park	3400 Arbor Vitae Street	14.0
Grevillea Park	231 South Grevillea Avenue	1.5
North Park	625 East Hargrave Street	2.3
Queen Park	652 East Queen Street	1.1
Rogers Park	400 West Beach Avenue	9.0
Siminski Park	9717 South Inglewood Avenue	1.9
Vincent Park	700 East Warren Lane	55.0
Total		89.6
<i>Source: City of Inglewood Department of Parks, Recreation and Community Services: Recovery Action Program for the City of Inglewood's Park System, 2002.</i>		

According to the *Recovery Action Program for the City of Inglewood's Park System*, northern and northeastern Inglewood are adequately served by parks having recreational facilities while the southern and southwestern neighborhoods are not served adequately by comparable facilities. These areas are densely populated with mostly apartments and have the greatest need for new parks and recreational facilities and should be given priority in the planning, acquisition and development of lands to resolve these park needs. The Open Space and Parks Element of the General Plan identifies Southwest Inglewood and Lockhaven areas as being the most park deficient portions of the City.

Goals and Policies

The 1995 Open Space and Parks Element of the General Plan and the Recovery Action Program for the City of Inglewood's Park System identify several goals and policies for parks and recreational areas within the City.

Within the Open Space and Parks Element, the primary goal is to provide recreational and park facilities for all residents in Inglewood. To achieve this goal, the City would seek to acquire park land, with priorities outlined in the following policies:

1. The City will strive to acquire land to provide two recreational parks in the park deficient areas of Southwest Inglewood and Lockhaven, each approximately 5 acres in size.
2. Additional land will be acquired to provide a minimum City-wide total of one acre per 1,000 residents. Upon satisfying this requirement, the City will strive to pursue any opportunity to provide additional park acreage to surpass this minimum standard.
3. Subsequent additional park acreage will be acquired and developed in areas and neighborhoods that are underserved or distant from existing parks.
4. The provision of additional park land will be balanced with the continued maintenance and improvement of existing parks and recreational facilities within the City.
5. Specific uses and design of any new park will be the responsibility of the Parks and Code Enforcement Department and the Recreation and Community Services Department. All parks will be designed to be fully accessible to persons with physical disabilities.

In 2002 the City's Department of Parks, Recreation and Community Services developed the Recovery Action Program (RAP) for the City of Inglewood's Park System, which serves as a Condition Report regarding the City's park and recreational areas. The RAP identified the Department's three main goals:

1. Repair hazards, particularly in areas used by children;
2. Increase usage through reparation of existing facilities and construction of new facilities that increase access to the parks and usage by more City residents; and
3. Improve park aesthetics through regular maintenance and repairs.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the parks department;
- (b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- (c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impacts Determined to be Less Than Significant

No impacts associated with park and recreation services were identified in the Initial Study to be less than significant.

Project Impacts

The Proposed Project contains a variety of types of parks and open space areas. For security reasons, some individual areas may be gated off (for example, a tot-lot, swimming pool or homeowners club house). Certain recreation facilities, such as the private swimming pool and restroom facilities located in Bluff Park will be open to Hollywood Park residents or facility members only. Other parks and open spaces will be maintained by the various home owners associations and generally open for public use during daytime hours only. After daylight hours parks and open spaces will only be open to Hollywood Park residents. However, for security reasons, after daylight hours the parks will not be open to the general public.

Development of the Proposed Project is anticipated to result in an increase of 8,985 permanent residents. (See Section IV.H, Population, Housing and Employment). Employees of the proposed commercial/retail uses are less likely to patronize parks during working hours, and are more likely to use parks near their own homes during non-work hours. Based on the City General Plan Open Space and Parks Element Ratio, the Proposed Project would generate a need for approximately 9 acres of public parkland in the project area (e.g., 8,985 x 1/1,000). The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site. Based on the Proposed Project's permanent population estimates, this equates to approximately 2.8 acres per 1,000 people. This added open space would help alleviate the City's existing substandard provision of parkland and recreational facilities. As the Proposed project would provide more than enough open space to meet the parks and recreation needs of the planned development, impacts upon the public parks and recreation system would be less than significant.

Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site.

As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in resident and daytime population (i.e., employees) generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the application of the Equivalency Program may generate higher demand for park services than compared to the Proposed Project.

Development of the Maximum Scenarios under the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents as compared to the Proposed Project. Employees of the proposed commercial/retail uses are less likely to patronize parks during working hours, and are more likely to use parks near their own homes during non-work hours. Based on the City General Plan Open Space and Parks Element Ratio, Equivalency Program would generate a need for approximately 11 acres of public parkland in the Project Area (e.g. 10,500 X 1/1,000). The Equivalency Program would fulfill the park and recreation needs of its residents by providing 25 acres of open space on the Project Site. Based on the Equivalency Program's permanent population estimates, this equates to approximately 2.4 acres per 1,000 people. As such, the Equivalency Program would provide more than enough open space to meet the parks and recreation needs of the planned development, and impacts upon the public parks and recreation system would be less than significant.

Therefore, the provision of park and recreation space would be provided adequately under the Equivalency Program, which has similar Project Design Features and mitigation measures.

All of the recommended project design features and mitigation measures under the Proposed Project to minimize potential impacts on school services would be applicable to the Equivalency Program.

CUMULATIVE IMPACTS

The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Inglewood. Of the 39 related projects, 13 projects would generate residents and, therefore, would combine with the Proposed Project to increase demands for parkland in the City. With the implementation of the additional 25 acres of open space created by the Proposed Project, the amount of public open space and recreational facilities available throughout the City would increase to approximately 115 acres. The City's projected population in 2020 (the year anticipated for buildout of the related projects) would be approximately 120,678 people (see Section IV.H, Population, Housing and Employment). This would represent a ratio of just under one acre per 1,000 residents, thereby increasing the acres/population ratio for parks and recreational space within the City. As stated above, the Proposed Project would provide approximately 2.8 acres of open space per 1,000 permanent residents within the proposed development. Under the proposed Land Use Equivalency Program, this could decrease to 2.4 acres per 1,000 permanent residents. With the development of the Proposed Project, the City would further its goal in attaining its parks and recreational space ratio goal of 1 acre per 1,000 residents. Therefore, the Proposed Project's impact upon the park and recreation facilities serving the city would not be cumulatively considerable when analyzed in conjunction with the cumulative development citywide. Therefore, the Proposed Project's cumulative impact would be less than significant.

PROJECT DESIGN FEATURES

The following PDFs are proposed to be incorporated in to the project description and were used in the basis for formulating portions of the environmental analysis with respect to parks and recreational

facilities. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

PDF K 4-1. The Proposed Project shall include the construction of 25 acres of parks, open space and recreational facilities within the Specific Plan Area in accordance with the Hollywood Park Specific Plan.

MITIGATION MEASURES

Mitigation Measures

MM K 4-1. For those areas that are proposed for general public access, the park and open space areas shall be maintained by the home owners associations with public access during daylight hours only.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to parks and recreational facilities would be less than significant.

IV. ENVIRONMENTAL IMPACT REPORT
K. PUBLIC SERVICES
5. LIBRARIES

ENVIRONMENTAL SETTING

The Inglewood Public Library provides library services throughout the City of Inglewood. Based on the State of California Library Statistics (2006) analyzing fiscal year 2004-2005, the Inglewood Library Department has a staff of 75 employees and operates three facilities totaling 87,160 square feet. Serving an area of approximately 8.85 square miles, the Inglewood Public Library serves a population of approximately 118,164 persons and had an annual attendance of 350,532 visitors.²² A comparative summary of the operating statistics of the Inglewood Public Library relative to the statewide mean is provided in Table IV.K-12, below.

Table IV.K-12
Inglewood Public Library Department Operating Statistics

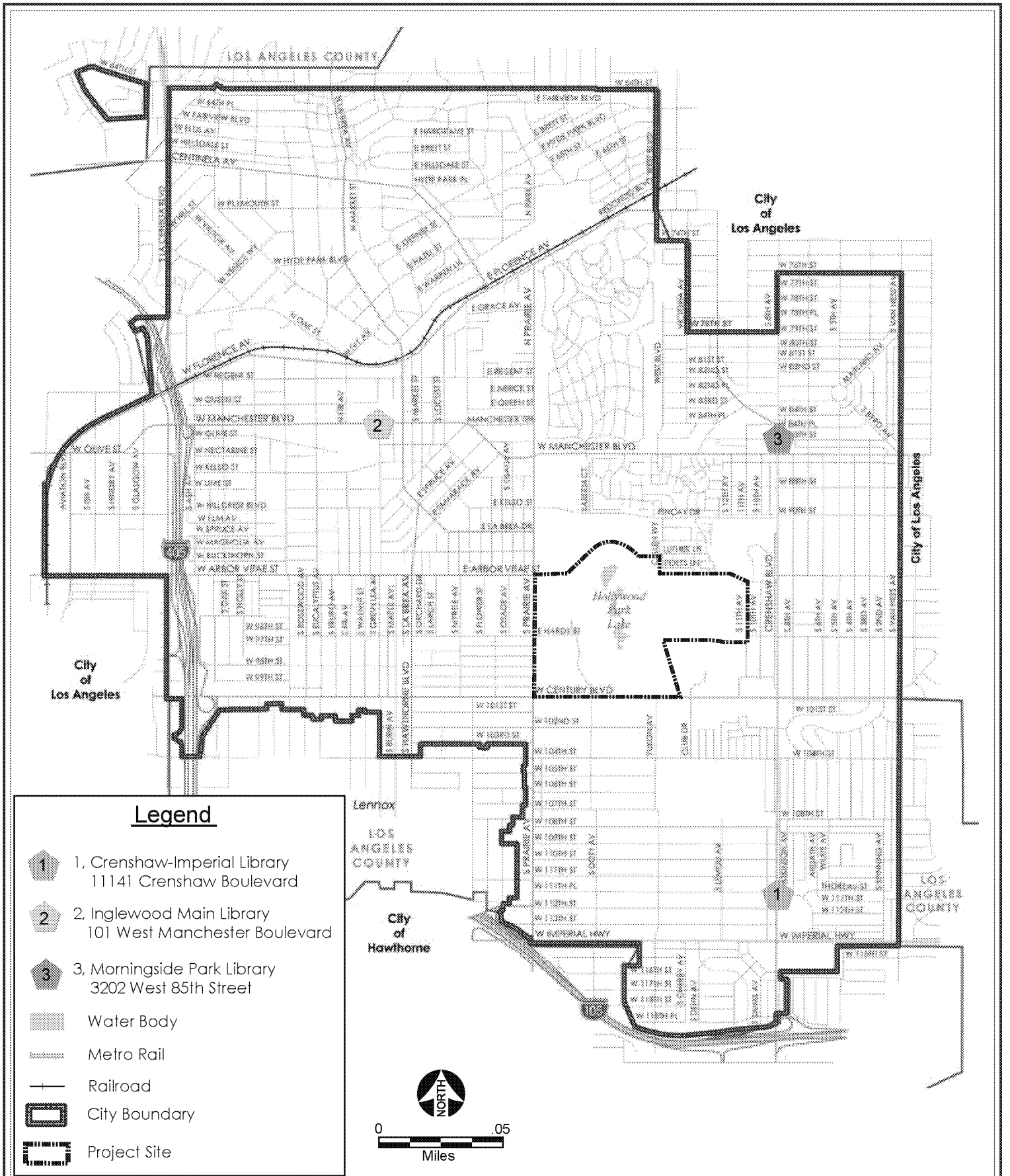
Operating Profile	Statewide Mean	Inglewood Library Department
Expenditures Per Capita	\$27.54	\$24.56
Materials Expenditures Per Capita	\$2.80	\$3.81
Total Materials Available Per Capita	2.33	4.08
Population Served Per FTE Staff	3,103	2,493
Books Per Capita	2.15	4.01
<i>Source: State of California Library Statistics (2006) analyzing fiscal year 2004-2005, Library Development Services Bureau, Sacramento, CA, 2006.</i>		

The Inglewood Public Library does not maintain a service ratio to guide the operation, maintenance, and construction of public library facilities in the City of Inglewood. Additions to the library are made on an as-needed basis with approximately three to four percent of the general fund of the City being allocated for library use. There are currently no plans for expansion of the main or branch libraries.

Library Locations

There are currently three libraries operating within a two-mile radius of the Project Site (See Figure IV.K-8, Library Locations for the locations of these facilities):

²² *State of California Library Statistics (2006) analyzing fiscal year 2004-2005, Library Development Services Bureau, Sacramento, CA 2006.*



- (1) Main Library
101 W. Manchester Blvd.
Inglewood, CA 90301-1771
(310) 412-5380

- (2) Morningside Park
3202 W. 85th St.
Inglewood, CA 90305-1910
(310) 412-5400

- (3) Crenshaw-Imperial
11141 Crenshaw Blvd.
Inglewood, CA 90303-2338
(310) 412-5403

The Main Library is approximately 2.3 miles northwest of the Project Site, the Morningside Branch Library is located approximately 1.0 mile northwest of the Project Site, and the Crenshaw-Imperial Branch Library is located approximately 1.0 mile south of the Project Site. As the closest of the libraries to the Project Site, the Morningside Library would likely be the primary library serving the Proposed Project.

The Morningside Park Branch Library, which is 2,260 square feet in size, is a relatively small neighborhood branch that is open five days a week for a total of 36 hours. The Crenshaw-Imperial Branch Library, which is 7,600 square feet in size, is also open 36 hours over five days. The Main Library, which is 77,300 square feet in size, is open seven days a week for a total of 60 hours. The Main Library serves the entire City, whose 2008 population is now estimated by the California Department of Finance at 118,878. Within this area, the primary service area of the Morningside Park Branch Library is estimated at 20,348 and the Crenshaw-Imperial Branch Library at 30,493. Full time equivalent (FTE) staffing is 38.89 at the Main Library, 3 at Morningside Park Branch Library, and 3.48 at Crenshaw-Imperial Branch Library. The Library makes extensive use of part-time personnel, so the number of employees is far higher than the FTE total.

There are no plans for new libraries or expansion of current libraries in the City of Inglewood.²³ The Crenshaw-Imperial Branch Library reopened in February 2007 after a complete renovation of the forty year old building. The IPL plans to renovate the Morningside Park Branch Library, while proposals to completely renovate the existing Main Library have not received funding. If the IPL cannot secure funds for a complete project, they are planning a number of significant renovations and upgrades to the building.

²³ E-mail correspondence from Michael Easley, Senior Administrative Analyst, Inglewood Public Library, to Brett Pomeroy, Environmental Planner, Christopher A. Joseph & Associates, July 11, 2007.

Additionally, there are several branch and community libraries near the Project Site that residents of the Proposed Project could potentially access. The Lennox Library, located at 4359 Lennox Boulevard in Lennox, is approximately 1.4 miles south of the Project Site, and currently has a collection of 53,700 volumes. The Hawthorne Library located in Hawthorne, the Culver City Julian Dixon Library located in Culver City, Baldwin Hills Branch Library and Westchester Branch Library, located in Los Angeles, are all within 6 miles of the Project Site.

ENVIRONMENTAL IMPACT

Methodology

The following impact analysis is based upon a written correspondence from Michael Easley, Senior Administrative Analyst of the Inglewood Public Library, dated July 11, 2007, in response to an informational request submitted by the environmental consultant. The determination of a significant impact upon library services is based upon the IPD's current staffing levels, facilities, and resources, and the IPL's assessment of meeting the future library demands generated by the project.

Threshold of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services.

Impacts Determined to be Less Than Significant

No impacts associated with library services were identified in the Initial Study to be less than significant.

Project Impacts

Development of the Proposed Project would result in the development of approximately 2,995 dwelling units resulting in a permanent residential population increase of approximately 8,985 persons (see Section IV.H, Population, Housing and Employment). This population increase has the potential to increase demands on library services in the area. The nearest library to the Project Site is the Morningside Branch library. The Proposed Project would also be served by the Main library and Imperial-Crenshaw Libraries. As discussed above, the Inglewood Public Library does not maintain a service ratio to guide the operation, maintenance, and construction of public library facilities in the City of Inglewood. Additions to the library are made on an as-needed basis with approximately three to four percent of the general fund

of the City being allocated for library use. The City does not impose developer mitigation fees or other assessments specifically earmarked for the Library.²⁴

Based on written correspondence from the IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels.²⁵ With additional funds, IPL would provide more hours of service at the three locations, more books and other materials, and a greater number of public-use computers. The IPL believes that their current facilities can provide the same level of service to the additional population in the proposed project area, except that the demand for public-use computers will increase. The IPL will seek funding to add additional workstations. Development of the Project Site would result in additional tax revenue in the City of Inglewood that could be used to expand the existing computer workstations at the Inglewood Public Library. In addition, the Proposed Project includes a 4-acre site be dedicated for civic uses. While the exact use of this civic-oriented use site has yet to be determined, the City could develop the site with a library, joint use school/library, or other public use to offset the increased demands upon the library services. Through the allocation of the civic center site and contribution to the City's tax revenue, the Proposed Project's impact upon library services would be assessed as appropriate, commensurate with the demands placed on the public library system. The Proposed Project's impact upon library services would therefore be considered less than significant.

Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in resident and daytime population (i.e., employees) generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the development of the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents. Employees of the proposed commercial/retail uses are less likely to patronize libraries during working hours, and are more likely to use libraries near their own homes during non-work hours.

Based on written correspondence from IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. With additional funds, IPL would provide more hours of service at the three locations, more books and other materials, and a greater number of public-use computers. Development of the Equivalency Program would result in additional tax revenue in the City that could be used to expand the existing library facilities. As with the case of the Proposed Project, the

²⁴ E-mail correspondence from Michael Easley, Senior Administrative Analyst, Inglewood Public Library, to Brett Pomeroy, Environmental Planner, Christopher A. Joseph & Associates, July 11, 2007.

²⁵ *Ibid.*

demand for library services under the Equivalency Program could be met by existing service, therefore, the impacts to library services would be less than significant.

CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with the 39 related projects listed in Section III (Related Projects) would result in an increase in employees and permanent residents in the project area. Employees generated by the commercial related projects would not typically enjoy long periods of time during the workday to visit the library facilities. However, the increase in the residential population by the related projects in the vicinity of the Proposed Project would increase demand at library facilities serving the Inglewood community. As noted in Section IV.H, Population, Housing, and Employment of this Draft EIR, the related projects in combination with the Proposed Project with the proposed Land Use Equivalency Program, would be expected to add an additional 12,480 to 13,995 persons to the City by 2020. As with the Proposed Project, each of the related projects would contribute to the City's tax base, of which approximately three to four percent of the general fund of the City is allocated for library use.

Furthermore, as the related projects are scattered in a radius of approximately 2 miles of the Project Site, they may also be served by other nearby libraries including the Lennox Library (4359 Lennox Blvd, Lennox), Hawthorne Library (12700 Grevillea Avenue, Hawthorne), the Culver City Julian Dixon Library (4975 Overland Avenue, Culver City), Baldwin Hills Branch Library (2906 S. La Brea, Los Angeles) and Westchester Branch Library (7114 W. Manchester Avenue, Los Angeles). Together, these resources would be sufficient to serve the related projects in combination with the Proposed Project and there would be a less than significant impact.

PROJECT DESIGN FEATURES

No specific PDFs have been proposed that are directly related to library services. However, the Proposed Project includes a 4-acre public benefit parcel that will be offered to the City or other local public agency or organization as part of the Development Agreement. While the impacts of this parcel have been analyzed under the assumption that may be developed as an elementary school or a library, depending upon the impact being analyzed, a final determination on the future use of the parcel will be made by the City Council. In addition, if it is utilized as a school, there would be a possibility of a joint library use.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With respect to threshold (a) above, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, nor would it generate the need for new or physically altered library facilities in order to maintain acceptable service ratios or other performance objectives for library services. Project impacts to library services would be less than significant.