

# IV. Environmental Impact Analysis

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## I.5 Public Services – Libraries

### 1. Introduction

This section of the Draft EIR evaluates whether new or physically altered library facilities would be required to provide library services to the Project, the construction of which could cause significant environmental impacts. The analysis considers available library capacity and whether it is sufficient to accommodate the population growth generated by the Project. The analysis is based, in part, on library standards and capacity data provided by City of Los Angeles (City) Public Library (LAPL) in correspondence dated December 9, 2022. This correspondence is included in Appendix I-5 of this Draft EIR.

### 2. Environmental Setting

#### a) Regulatory Framework

There are several plans, policies, and programs regarding Libraries at the federal, state, regional, and local levels. Described below, these include:

- City of Los Angeles General Plan Framework
- Los Angeles Public Library Branch Facilities Plan 2007
- Los Angeles Public Library Strategic Plan 2015–2020
- Community Plan

##### (1) Local

###### (a) *City of Los Angeles General Plan Framework Element*

The City's General Plan Framework (Framework Element), adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City and defines Citywide policies regarding land use, including infrastructure and public services. The City's objectives regarding the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21. Objective 9.20 and the associated policies provide for the development of Citywide library service standards, including a facility's appropriate floor area, service radius, and the number of permanent collection books per resident. Objective 9.21 proposes to ensure library services for current and future residents and businesses. Under the Framework Implementation Programs, Plans and Policies Chapter, Framework Policy 13, the Department of Libraries is charged with the responsibility of updating the

Library Master Plan to provide sufficient capacity to correct existing deficiencies as well as meet the needs of future population. The implementation plans and policies set forth in the Framework Element were addressed through the 2007 LAPL Branch Facilities Plan (Facilities Plan) (discussed further below).<sup>1</sup>

(b) *Los Angeles Public Library Branch Facilities Plan 2007*

The Los Angeles Public Library Branch Facilities Plan was first adopted in 1988 and later revised in 2007 as Appendix VI of the Los Angeles Public Library Strategic Plan 2007-2010. The 1988 Branch Facilities Plan became the blueprint for the most significant change in the Los Angeles Public Library infrastructure in its history. Based on the Facilities Plan and the construction funds obtained in the subsequent bond issues, 90% of the library infrastructure was replaced in a fifteen-year period. The Facilities Plan guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. Facility needs and population growth projections to the year 2030 are forecasted within the Strategic Plan. The Facilities Plan within the Strategic Plan also outlines guidelines for the expansion of City library facilities based on the location and population served in each community. Under the Facilities Plan, the service population for a branch library is determined by the size of the facility as set forth in **Table IV.I.5-1, LAPL Branch Facilities Plan – New Library Building Size Standards.**

**TABLE IV.I.5-1  
LAPL BRANCH FACILITIES PLAN – NEW LIBRARY BUILDING SIZE STANDARDS**

<b>Library Type</b>	<b>Population Served</b>	<b>Size of Facility<sup>a</sup></b>
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library is recommended	90,000	12,500–14,500

SOURCE: Los Angeles Public Library, *Building on Success: Strategic Plan, 2007–2010*. Adopted December 11, 1996. The above cited building size standards are the same as in the 2015–2020 Strategic Plan.

The 2007 Branch Facilities Plan is the basic document driving future development of LAPL facilities. As such, it provides guidance on the preparation of cost estimates for property acquisition, design and construction of proposed library projects, and analyses of options for obtaining funding to build new libraries.

<sup>1</sup> City of Los Angeles, Department of City Planning, *City of Los Angeles General Plan Framework, Objectives 9.20 and 9.21*. Accessed March 16, 2022.

*(a) Los Angeles Public Library Strategic Plan 2015–2020*

The Los Angeles Public Library Strategic Plan 2015–2020<sup>2</sup> (Strategic Plan) sets forth LAPL’s goals and objectives focused on providing library services within existing library facilities. The goals and objectives discussed in the Strategic Plan focus on community development and program expansion in an effort to increase the number of people who use the library services, increase the number of library card holders, and increase residents’ overall engagement with the library. Through Measure L, approved in March 2011, LAPL would also be able to expand its services, collections and technology. The LAPL Strategic Plan 2015-2020 is a five-year plan to detail expanded programs and services, referred to as Key Activities within the Plan, offered by LAPL.<sup>3</sup>

*(b) Community Plan*

The Land Use Element of the City’s General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City’s General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans’ texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to libraries required to support such growth. The community plans’ maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project is located in the Central City Community Plan area. As shown in **Table IV.I.5-2, Relevant Central City Community Plan Objectives and Policies**, the Central City Community Plan sets forth one objective and one policy related to libraries.

**TABLE IV.I.5-2  
RELEVANT CENTRAL CITY COMMUNITY PLAN OBJECTIVES AND POLICIES**

Goal/Objective/Policy	Description
Objective 8-1	To assist the City Library Department in providing adequate library service which responds to the needs of the community.
Policy 8-1.1	Encourage flexibility in siting libraries in mixed use projects, pedestrian oriented areas, transit oriented districts, and similarly accessible facilities.

SOURCE: City of Los Angeles, *Central City Community Plan*, 2003.

<sup>2</sup> Los Angeles Public Library *Strategic Plan 2015–2020*, June 2015.

<sup>3</sup> Los Angeles Public Library, *Strategic Plan 2015–2020*, June 2015, page 6.

## b) Existing Conditions

### (1) Regional Facilities

The LAPL provides library services throughout the City, which includes the Central Library, eight regional branch libraries, and 64 community branches, as well as through online resources.<sup>4</sup> The LAPL has over 8 million books in their collection, and offers resources, services, and programs for high school graduation, health examinations/vaccinations, financial literacy education, homeless transition, test preparation/tutoring, STEAM, job and career development, and veteran assistance.<sup>5</sup>

The LAPL's network of libraries includes expanded and rebuilt facilities, as well as facilities at new locations. All branch libraries provide free access to computer workstations, thereby enabling patrons to access the internet and the LAPL's electronic resources, including an online catalog, subscription databases, word processing, language learning, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish speakers.

The LAPL is a member of the Southern California Library Cooperative, an association of 40 independent city, county, and special district public libraries located in Los Angeles and Ventura counties that have agreed to cooperate in providing library service to the residents of all participating jurisdictions.<sup>6</sup> The Southern California Library Cooperative provides member libraries with a resource-sharing network and a means to enhance the level and diversity of resources available to library users, while reducing duplication of effort.

### (2) Local Facilities

Based on correspondence from the LAPL, the Project Site is served by following three libraries: the Little Tokyo Branch Library at 203 S. Los Angeles Street approximately 0.5 miles to the northwest of the Project Site; the Richard J. Riordan Central Library located at 630 W. 5th Street approximately 0.9 miles to the west of the Project Site; and the Chinatown Branch Library located at 639 N. Hill Street approximately 1.2 miles to the north of the Project Site.<sup>7</sup> **Figure IV.I.5-1, *Libraries Located in the Vicinity of the Project Site***, shows the location of these three libraries in relation to the Project Site. **Table IV.I.5-3, *LAPL Libraries in the Project Vicinity***, provides information regarding these libraries, including their distance/direction from the Project Site, facility size, collection size, the number of full-time staff, and the service population.

<sup>4</sup> Los Angeles Public Library Strategic Plan 2015–2020, June 2015.

<sup>5</sup> LAPL website, <https://www.lapl.org/about-lapl/press>, accessed September 1, 2023.

<sup>6</sup> SCLA website, <https://socallibraries.org>, accessed September 13, 2022.

<sup>7</sup> LAPL correspondence, December 9, 2022. See Appendix I-5 of this Draft EIR.

**TABLE IV.I.5-3  
LAPL LIBRARIES IN THE PROJECT VICINITY**

<b>Library</b>	<b>Distance/ Direction from Project Site (miles)</b>	<b>Facility Size (sf)</b>	<b>Collection Size</b>	<b>Full-Time Staff</b>	<b>Service Population</b>
Little Tokyo Branch Library 203 S. Los Angeles Street	0.5 northwest	12,500	66,009	10 employees	48,889
Richard J. Riordan Central Library 630 W. 5th Street	0.9 northwest	538,000	2.9 million	195 employees	3,951,591
Chinatown Branch Library 639 N. Hill Street	1.2 north	14,500	80,995	11 employees	10,804

SOURCE: LAPL correspondence, December 9, 2022; ESA, 2023

The closest library to the Project Site is the 12,500-square foot Little Tokyo Branch Library, which serves a population of 48,889 persons. This library has 10 full-time staff positions. The library includes a total of 66,009 volumes in its collection. Special facilities include free public wireless internet, wireless printing, computer reservations, meeting room rentals, and zoom text computers for the visually impaired. The Little Tokyo Branch Library does not meet the 2007 Branch Facilities Plan's recommended building size standards (14,500 square feet for a service population over 45,000 persons).

The Richard J. Riordan Central Library (Central Library) is a 538,000-square foot regional library serving a population of 3,951,591 persons. This library currently has 195 full-time staff positions. The Central Library includes a total of 2.9 million volumes in its collection.<sup>8</sup> There are 255 free public access computers located in the Computer Center and throughout the Central Library. Internet access is also provided by Wi-fi. LAUSD Downtown Magnets High School uses the Central Library as a classroom.

The Chinatown Branch Library located 1.2 miles north of the Project Site is a 14,5000-square foot branch that serves a population of 10,804 persons. This library has 11 full-time staff positions. The library includes a total of 80,995 volumes in its collection. Special facilities include free public wireless internet, wireless printing, computer reservations, meeting room rentals, and zoom text computers for the visually impaired. The Chinatown Branch Library, at 14,500 square feet, does meet the standard of 12,500 square feet for a service population of less than 45,000.

<sup>8</sup> LAPL website, <https://www.lapl.org/about-lapl/central-facts>, accessed October 12, 2023.



SOURCE:ESRI, ESA, 2022.

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**Figure IV.I.5-1**  
Libraries Located in the Vicinity of the Project Site

Correspondence received by the LAPL does not indicate any current plans to expand any of the three libraries serving the Project area, nor does it indicate any current plans to construct new libraries in the Project vicinity.<sup>9</sup>

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to libraries if it would:

***Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City’s 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate libraries impacts include:

- The net population increase resulting from the proposed project;
- The demand for library service anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project’s proportional contribution to the demand; and whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to LAPL).

#### b) Methodology

The LAPL defines population-based service standards for service areas associated with each library location. Potential Project impacts on library facilities and services are therefore determined by identifying the primary service library or libraries that serve the Project Site, determining the population capacity within the associated library service area(s), and comparing the number of new Project-related residents to the capacity of the library to serve new residents. Refer to Section IV.H, *Population and Housing*, of this Draft EIR, which discusses the Project resident calculations. As discussed therein, the Population Per Unit Factor for multi-family units within the City of Los Angeles VMT

<sup>9</sup> LAPL, correspondence dated December 9, 2022.

Calculator Documentation, which assumes an average household size of 2.25 population, was used to calculate Project residents.

### c) Project Design Features

No specific Project Design Features are proposed with regard to libraries.

### d) Analysis of Project Impacts

***Threshold (a): Would the Project result in a substantial adverse physical impact associated with the provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?***

#### (1) Impact Analysis

##### (a) Construction Impacts

The Project's construction workers would be drawn from an existing regional labor pool whose workers move between construction projects on a short-term basis without requiring relocation. Workers traveling to work may stop at a library that is outside of their residential neighborhood. Such library stops would be incidental and typical of workers throughout the region. Such variations would occur on short-term basis. Therefore, there would be no notable increase in library usage at the libraries serving the Project Site, and, therefore, there would be no need for the construction of library facilities to accommodate construction population.

There are no libraries located in the immediate vicinity that would be affected by construction activities occurring at the Project Site. The nearest library, the Little Tolko Branch Library, located approximately 0.5 miles north of the Project Site, is separated by intervening development from the Project Site. There would be no Project-related construction staging or road closures at or adjacent to the Little Tokyo Branch Library. Therefore, construction activities would not adversely affect the operations of nearby libraries.

The increase in demand for library services due to Project construction would be negligible in amount and duration and Project construction activities would not adversely affect local libraries. **As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, which would result in the need for new or altered facilities, or substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Impacts on library facilities during Project construction would be less than significant.**

(b) *Operational Impacts*

The Project would provide 1,521 new residential units and 3,423 residents, as discussed in Section IV.H, *Population and Housing*, of this Draft EIR, which would increase demand for use of libraries in the Project area. With regard to the potential for the employees of the proposed uses to utilize nearby library facilities, as discussed in Section IV.H, the Project would result in approximately 1,975 net new employees. These new employee opportunities would include a range of full-time and part-time positions that would typically be filled by persons already residing in the vicinity of their workplace and who already generate demand for the libraries in the vicinity of the Project Site. Additionally, employees at the Project Site would have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Moreover, employees would be more likely to use libraries that are closest to their homes rather than their place of work. As such, any direct or indirect demand for library services generated by employees of the Project would be negligible.

As discussed above, there are three libraries that would serve the Project Site. The Little Tokyo Branch Library is the nearest library to the Project Site (approximately 0.5 miles northwest). The next closest library is the Central Library (approximately 0.9 miles northwest). The Central Library services the entire LAPL service area. Finally, the Chinatown Branch Library is located 1.2 miles north of the Project Site.

As identified in Table IV.I.5-3, the Little Tokyo Branch Library at 12,500 square feet, with a service population of 48,889 does not meet the LAPD Branch Facilities Plan of 12,500 square feet for a service population of 45,000. Based on this, the Little Tokyo Library is not adequately sized to accommodate the 48,889 people residing in its service area. Thus, use of this library by Project residents would further constrain the ability of the library to serve local demand. However, even with the addition of additional use by Project residents, the service population for the library would not increase above the 90,000 population figure at which the LAPL would consider building a new branch library. Therefore, a new branch library would not be considered. Also, the LAPL has stated there are no planned improvements to add capacity to the Little Tokyo Branch Library, and there are no plans for other new libraries to serve this community.<sup>10</sup>

The Central Library is the next closest library at 0.9 miles from the Project Site. The Central Library serves the entire LAPL service area and as indicated in Table IV.I.5-1, the LAPL Branch Facilities Plan does not identify population served or facility size criteria for this facility, as it serves not just the Downtown Los Angeles area, but the entire City as a unique facility with resources beyond those provided through local and regional branch libraries.

The Chinatown Branch Library is located 1.2 miles from the Project Site. The Chinatown Branch Library, at 14,500 square feet, does meet the standard of 12,500 square feet for a service population of less than 45,000. Based on this, the Chinatown Branch Library is currently operating within capacity and is adequately sized to accommodate the

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<sup>10</sup> LAPL, correspondence dated December 9, 2022.

population currently residing in its service area. Thus, use of this library by Project residents would not constrain the ability of the library to serve local demand. LAPL has stated there are no planned improvements to add capacity to the Chinatown Branch Library, and there are no plans for other new libraries to serve this community.<sup>11</sup>

Given the Project Site's proximity to the Little Tokyo Branch Library, it is assumed Project residents would be most likely to patronize this library, however, with relatively close proximity to the Central Library with its extensive collection and 538,000 sf facility size, some residents will likely choose to use the facility for access to library services. In some cases, Project residents may also choose to visit the Chinatown Branch Library at their discretion. Therefore, the Project has the potential to increase demand for the Little Tokyo Branch Library with existing overcapacity conditions. However, potential Project impacts would be reduced by the proximity of the Project to the Central Library, which is within 0.9 mile of the Project Site and could draw at least some of the Project residents for library services. In addition, even if all of the Project residents were to use only the Little Tokyo Branch Library or Chinatown Branch Library, the new level of service population for each library would not increase the population such that construction of a new branch library would be recommended according to the LAPL's standards. As discussed above, LAPL has determined through its Facilities Plan that a new branch library would not be considered until the service population for a particular branch library has reached 90,000. Therefore, the Project's increase in demand for library services would not reach the recommended level at which LAPL would consider building a new branch library in the area.

Because no new or expanded libraries have been identified by LAPL to serve the Project area, it would be speculative to assume that new or expanded libraries would be developed. At such time that new or expanded libraries are identified by LAPL to serve the Project area, the environmental impacts of those facilities would be evaluated by LAPL under CEQA independent of the Project.

The City's CEQA Thresholds Guide considers whether a project includes features that would reduce the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities, which studies have shown to reduce demand at physical library locations.<sup>12,13</sup> In addition, the Project would generate revenue for the City's general fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be used for the provision of public services such as library facilities. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. Additionally, LAPL has been increasing their online services, including a

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<sup>11</sup> LAPL, correspondence dated December 9, 2022.

<sup>12</sup> Troll, Denise A., *How and Why Libraries Are Changing: What We Know and What We Need to Know*, Carnegie Mellon University, 2002.

<sup>13</sup> Tenopir, Carol, *Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies*, 2003.

variety of e-books, study materials, and support, available to users through the LAPL online resources.<sup>14</sup> These online sources would further reduce the Project's impacts on LAPL services.

For these reasons, Project impacts on the libraries identified by LAPL would be less than significant. **Therefore, impacts resulting from Project operation would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. Therefore, impacts to libraries would be less than significant.**

## (2) Mitigation Measures

Impacts regarding libraries would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Impacts regarding libraries were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

# e) Cumulative Impacts

## (1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 39 related projects that are anticipated to be developed in the vicinity of the Project Site. However, since impacts on libraries are determined by the size of residential populations served and their respective proximity to LAPL libraries, this cumulative impact analysis is based on the population that would be generated by those related projects that include a residential component. The LAPL uses residential population as the basis for evaluating library service levels; although employees may use employment location-based libraries, such use would be offset by other employees visiting other locations across residential boundaries. As analyzed in Section IV.H, *Population and Housing*, of this Draft EIR, the related projects containing residential components would have the potential to generate a cumulative population increase of 17,245 people. The population increase from the Project and the related projects would generate a total of 20,668 residents.

Library usage is expected to be distributed across all three libraries (two Branch Libraries and the Central Library) serving the Project, as well as any other libraries outside of the three identified specifically for the Project that are located closer to those related projects farthest from the Project Site. This analysis is also conservative because it does not take into account related projects that may not be built, or that may be reduced in size, or the demolition of any existing housing that may be required to accommodate the new

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<sup>14</sup> LAPL, *Strategic Plan 2015–2020*, page 12.

development. The majority of the related projects would primarily use the Little Tokyo Branch Library (not the Chinatown Branch Library) since it is located generally within one mile to the majority of the related projects. Even if all 20,668 cumulative residents were added to the Little Tokyo Branch Library service population of 45,796 persons, the service population would not exceed the LAPL's 90,000 person threshold to consider a new branch library.

Additionally, the related projects would, similar to the Project, have several library options to choose from. The Central Library services the entire City and would therefore be able to serve all related projects and the Project. Additionally, the Central Library is located within 0.2 miles from the 7th Street/Metro Center, which directly services the Expo, Blue, Purple, and Red Lines and ties into the Gold Line at Union Station. The majority of the related projects located within the South Park area of Downtown Los Angeles would likely patronize the Central Library as it would be the closest to their respective locations and has a much larger collection/circulation and facility. Related projects that are located farther east could utilize the Ben Franklin Branch Library located at 2200 E. 1st Street. Related projects that are located farther west would be within the library service area of the Pico Union Branch Library located at 1030 S. Alvarado Street.

Similar to the Project, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied to enhancing library services in the Community Plan area, as deemed appropriate by the City. These revenues to the City's General Fund would help offset the increase in demand for library services as a result of the Project and the related projects.

Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of the LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space.

Additionally, because the location and operational characteristics of any new or expanded libraries have not yet been identified by LAPL to serve the Project or the related projects, it would be speculative to determine how any future shortages would be addressed, including where and what those facilities may be. At such time that new or expanded libraries are identified by LAPL, the environmental impacts of those facilities would be evaluated by LAPL under CEQA as a project independent of the Project.

Based on the above considerations, the Project and related projects would not have a significant cumulative impact on libraries. This determination acknowledges that new or expanded library facilities may be considered to accommodate the demands associated with cumulative population growth, since what environmental impacts, if any, such new or expanded facilities might create cannot be known until the City identifies new or expanded facility sites. Moreover, the City will be required to conduct CEQA review when

and if such new or expanded facilities are identified. Therefore, impacts resulting from operation of the Project and related projects would not create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. The less-than-significant cumulative impacts of the related projects combined with the less-than-significant impacts of the Project would have a less-than-significant cumulative impact on libraries. **Therefore, cumulative impacts on libraries would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts regarding libraries were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

## (3) Level of Significance after Mitigation

Cumulative impacts regarding libraries were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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