

January 12, 2007

The Honorable Susan Seamans
and Members of the City Council
City of Rolling Hills Estates
4045 Palos Verdes Drive North
Rolling Hills Estates, CA 90274

Dear Mayor Seamans:

Re: PVLD Response to the Peninsula Village Overlay Zone
Program Environmental Impact Report

The Palos Verdes Library District (PVLD) supports the concept of a revitalized, mixed-use commercial and residential district in the proposed Peninsula Village Overlay Zone. PVLD believes such a district will bring a renewed vitality to the neighborhood of the Peninsula Center Library, and looks forward to serving residents and visitors of the Peninsula Village zone.

That said, a review of the Program Environmental Impact Report (PEIR) has identified several areas of concern regarding the impact of the proposed redevelopment on the Peninsula Center Library and its users. PVLD is confident that these concerns can be addressed and has included possible mitigation strategies in this response.

PVLD's primary areas of concern are:

- Impact on Peninsula Center Library services and facilities
- Effect of Redevelopment of properties adjacent to Peninsula Center Library – particularly with regard to PVLD's youth Annex and to parking
- Interface between the Peninsula Center Library and adjacent properties

The following comments are based on the project described in Sections 1-4 of the PEIR. From PVLD's perspective the alternatives set forth in Section Five have similar impacts as the project described in Sections 1-4, varying only in terms of the scale of the impact on PVLD.

Impact on Library Services and Facilities at Peninsula Center Library

Section 4.10-8 of the PEIR reports that the project has the potential to increase the population of the City of Rolling Hills Estates by 1,545 residents above current growth forecasts. The following table summarizes the effect of the population increase attributable to this project on key library usage statistics. National data has been included for comparative purposes and to highlight the already high usage of PVLD's facilities and services.

	2005 National Average*	2005 PVL D*	Project Impact on Peninsula Center Library (assumes current service levels are sustained)
Resident Service Population	50,000-99,000	70,600	1545 increase **
Circulation Per Capita	9.3	12.2	18,849 increase in Circulation
Library Visits Per Capita	5.6	9.3	14,360 increase in library visits
Reference Transactions Per Capita	1.06	1.5	2,318 increase in reference transactions
Library Holdings Per Capita	3.25	3.6	5,562 increase in volumes

*Source: *Public Library Data Service Statistical Report 2006, American Library Association*

**Source: *Program Environmental Impact Report, Page 4.10-8*

Additional usage translates into additional costs. While we have not conducted a comprehensive cost impact study, PVL D has done some high level calculations of the potential cost impact.

In the 2006/2007 fiscal year the cost of providing library services at the Peninsula Center Library is \$3.79 million (excluding administrative overheads and costs associated with the Miraleste and Malaga Cove libraries). This equates to an annual cost of \$53.73 per resident. The incremental cost of serving an additional 1545 residents in the area surrounding the Peninsula Center Library is estimated to be approximately \$83,000/year (in 2006 dollars). PVL D's primary source of funding is local property taxes, and it is assumed that the proposed developments would generate sufficient additional property tax revenues to offset increased operating costs. This assumption could, however, prove invalid if PVL D were to experience a decline in property tax revenues due to general economic conditions or as a result of legislative action.

Potential capital cost impacts are more difficult to assess and costly to resolve. These include:

1. The need to increase the library collection to meet the needs of the larger service population. An additional 5,560 volumes would need to be added to the collection to maintain PVL D's current standard of 3.6 items per capita. This would require an investment of an additional \$195,000 (in 2006 dollars) assuming an average cost of \$35 to purchase, catalog, and process each item. This does not include the cost of acquiring and installing additional shelving or of reconfiguring the layout of the library to accommodate the larger collection. The amount of space required to house additional library materials depends on a number of factors, including the height of the shelving units to be used. A basic guideline used by many libraries is to assume 1 square foot of space would house 10 volumes. Using this standard the Peninsula Center Library would need to create an additional 550 square feet of accessible book storage. This would be difficult to accomplish without significant reconfiguration of the library space.
2. Demand for additional computers for public use. There are presently 30 computers available for public use at the Peninsula Center Library (a 50% increase in the last 12 months), as well as a wireless network available to library users who bring their own laptop computers to the library. It is difficult to project the impact of the Peninsula Village project on demand for

computer resources, however public libraries located in vibrant commercial districts generally experience heavy demand for computer access from customers and employees of the local businesses. PVLD anticipates a need for additional computers, and notes that this would require reconfiguration of the current library layout to make room for additional computer workstations and to provide the necessary electrical and data services. PVLD also notes that any significant increase in usage of the wireless network would also require PVLD to acquire greater data transmission capability (bandwidth).

3. The Peninsula Center Library provides seating and study space for approximately 400 people. At peak hours it is not uncommon for all study rooms to be occupied and with waiting lists, and for most other seating to be occupied. Any significant increase in library usage would require both the purchase of additional seating, and a means of addressing the space limitations previously noted.
4. The Children's Story Time Room at the Peninsula Center Library has a capacity of 70. Attendance at story times is strong and growing and PVLD continues to add additional sessions to meet demand while still ensuring the room is not filled beyond its rated capacity. If the additional households include a significant number of preschool children PVLD would expect to see further demand for story times, which in turn would create a need for additional staff and/or story time space.

It is difficult to assess the cost of reconfiguring the library space to accommodate increased usage as outlined above. As an indicator, in 2002-2003 the Board of Library Trustees engaged a firm of architects experienced in library design to conduct an evaluation of the Peninsula Center Library with regard to space utilization relative to library service needs at that time. Several options to reconfigure existing spaces were presented, with conceptual cost estimates ranging from \$2.5 millions to \$3.5 million (using 2003 dollars and construction costs). PVLD does not have the resources to fund capital expenditures of this magnitude.

The impacts outlined above reflect the costs of serving the additional resident population. The experience of other jurisdictions indicates that the employees and customers of local businesses will also make use of the library. The PEIR did not include specific information about increased numbers of employees and customers, however it should be noted that impact studies conducted in other jurisdictions typically weight the impact of an employee on library services as equivalent to 0.25 to 0.35 residents.

Potential Mitigation Strategies

The PEIR recognizes the potential for the project to impact library services, and includes Mitigation Measure 4.11-7 to address "Library services impacts during operation":

"Prior to approval of any development within the PVOZ, the project applicant shall provide evidence to the Planning Director of coordination with the PVLD regarding potential demand for library services and appropriate measures to address this demand. Measures may include provision of additional storage space for inventory, library equipment, or materials."

While the acknowledgement of library impacts is appreciated, PVLD believes that the mitigation strategy and the requirements for project applicants should be more clearly defined.

At the request of City of Rolling Hills Estates staff, PVLD conducted preliminary investigations into the possibility of implementing so-called “development fees” or “impact mitigation fees.” Legal advice indicates that PVLD does not have the statutory authority to levy such fees. The City of Rolling Hills Estates, however, does have the requisite statutory authority. PVLD therefore requests that, prior to enacting the Peninsula Village Overlay Zone, the City conduct a fee study to determine whether such a fee is warranted. Such a study could perhaps be incorporated into the evaluation of proposed fees for streetscape improvements. If analysis proves that a fee is warranted, PVLD requests that the City implement and collect any such fees on PVLD’s behalf.

If it is not feasible to include an “across the board” development fee for library services as a general requirement of development within the Peninsula Village Overlay Zone PVLD requests that the zoning changes incorporate a requirement that a formal assessment of library impacts be conducted for each project by the project applicant, and that acceptance of proposed mitigation measures by PVLD be a condition of project approval.

Redevelopment of The Village - Impact on PVLD’s Youth Annex

In September, 2006 PVLD opened an Annex to the Peninsula Center Library to serve Middle and High School students. The Annex is designed to address both the Peninsula Center Library’s lack of appropriate facilities for teens and the need for safe, supervised recreational space for young people on the Peninsula. The Annex is located in a 1500 square foot retail space in The Village shopping center adjacent to the Peninsula Center Library. PVLD leases the space from Continental Development, the owner of The Village, and operates the Annex in partnership with local youth services non-profit Freedom4U. The Annex offers a collection of popular reading material such as magazines and paperback books, computers for recreational and homework use, group study space, video and board games, and programs, events, and activities for teens.

The Annex has already proven to be a success with a door count of over 700 each month. At peak after school times all available seating is occupied, and attendance at weekend events is nearing the rated capacity of the space.

Our concerns regarding the Annex fall into two areas:

1. Continental Development has already announced its plan to redevelop The Village into a mixed use residential and commercial complex. This redevelopment has the potential to displace the Annex both during construction and long-term. This would have significant cost and operational implications for both PVLD and Freedom4U.

In discussion with PVLD Continental Development has indicated willingness to include space for community and non-profit activities such as the Annex in its redevelopment plans and to assist with any transitional arrangements required during construction; however no firm commitments have been made.

2. As noted above the Annex is already operating close to capacity at some times. If the additional households in the Peninsula Village zone include significant numbers of Middle and High School students it is likely that expansion of the Annex will be necessary.

Potential Mitigation Strategies

The PEIR recognizes the potential impact of the project on the Annex, and includes Mitigation Measure 4.11-8 to address “Teen Annex impacts during operation”:

“Prior to issuance of any building permits for any redevelopment project in The Village Shopping Center, the applicant shall coordinate with the PVLD to find an adequate site to relocate the Teen Annex. Evidence of this coordination shall be provided to the Planning Director”

PVLD requests that the Mitigation Measure be amended to address the potential for the redevelopment of The Village to impact the Annex during both construction and operation.

PVLD also requests that that PVLD’s acceptance of any proposed mitigation measures be a condition of project approval, and strongly encourages the City to make inclusion of adequate space for the Annex in the redeveloped Village property a condition of project approval.

Redevelopment of The Village - Parking Impacts

The Peninsula Center Library provides parking at no cost in its second floor parking garage and rooftop parking lot, and also relies on shared use of the parking lot in “The Village” shopping center as a condition of a code variance issued when the Peninsula Center Library was expanded in the mid-1990s.

For the most part these parking areas combined provide adequate parking for library users, although on occasion (such as during a large library or community event) all of these parking areas are full. It should be noted, however, that due to their central location the Peninsula Center parking areas and in particular The Village parking lot on Deep Valley Drive are also used by employees and customers of businesses such as those in the Avenue of the Peninsula mall. Increased commercial activity in the Peninsula Village zone combined with increased library usage could put further pressure on these centrally located parking areas.

PVLD’s primary concern, however, is with the potential impact of the redevelopment of The Village on the parking available for library users. Currently The Village has public parking areas both on Silver Spur Road adjacent to the lower entrance to the Peninsula Center Library, and on Deep Valley Drive convenient to the main entrance to the library. The parking area on Deep Valley is also used as a convenient area for “drop off” and “pick up” of library users as it provides the most direct access to the library itself.

Any relocation or reconfiguration of the parking on The Village property would need to preserve the number of parking spaces available to library users and would need to be designed to maintain ease of access to the library building.

Potential Mitigation Strategies

The PEIR addresses general concerns about parking for residents of and visitors to the Peninsula Village zone. PVLD encourages the City to continue to pay attention to the need for adequate, convenient, and safe parking, and in particular to ensure that proposed solutions address human behaviors observed and experienced by PVLD such as a preference for centrally located, above ground “open lot” style parking such as that currently available at The Village.

The PEIR specifically recognizes the potential parking issues associated with redevelopment of The Village property and includes Mitigation Measure 4.13-3 to address “Parking and circulation impacts during operation”:

“Prior to the approval of individual development projects within the PVOZ, the applicant shall provide a project-specific parking and circulation analysis that identifies parking requirements and any needed circulation improvements to ensure traffic safety. The parking analysis shall be consistent with the existing reciprocal parking agreement between the Palos Verdes Library District, the Village Shopping Center, and the City of Rolling Hills Estates. The City Traffic Engineer shall review the analysis for consistency with the City’s Zoning Code and Standard Design Plans and shall approve the analysis.”

PVLD is pleased that the PEIR recognizes the importance of the reciprocal parking agreement but requests that PVLD’s acceptance of the proposed parking plan for The Village property be a condition of project approval.

Interface between the Peninsula Center Library Property and Adjacent Properties

The Streetscape Plan contained in Section 3.4-4 of the PEIR includes a proposal for “pedestrian paseos” to connect Silver Spur Road and Deep Valley Drive on both the north and south sides of the Peninsula Center Library.

To the north of the library “A paseo provides convenient connections between major streets within Peninsula Village. The paseo is enhanced with a variety of streetscape furnishing improvements and enhanced pedestrian lighting and landscaping”.

To the south of the library “An enhanced pedestrian promenade within the district will create a novel pedestrian experience that will draw activity from around the community. Special features such as a fountain or public art provide distinctive public amenities. Landscaping and street furniture is particularly prevalent.”

As described, these paseos have the potential to reinforce the position of the Peninsula Center Library as a center of community life for both the Peninsula Village area and the broader community, and as such PVLD supports the concept.

That said, the PEIR is somewhat lacking in detail as to how these paseos will be developed, who will maintain them, and how safety and security issues such as the potential for loitering, skateboarding, etc. will be addressed. Without further information it is difficult for PVLD to provide specific comments.

Potential Mitigation Strategies

The General Plan Amendments and Zoning Changes should clearly address questions such as:

- Who will be responsible for constructing the paseos.
- Who will be responsible for long-term maintenance.
- Whether PVLDD will have a role in approving the final designs of the public spaces adjacent to its property.
- How the safety and security will be maintained.

Thank you for the opportunity to provide comments on this exciting project, and for your consideration of our concerns and suggestions.

Sincerely,

William Lama, President
Palos Verdes Library District Board of Library Trustees

WL:mm

Cc: Board of Library Trustees
Kathy Gould, District Director
Doug Prichard, City Manager