

IV. Environmental Impact Analysis

J. Public Services

2. Police Protection

1. Introduction

This section analyzes whether the Project's new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated December 6, 2022, and includes statistical data regarding police protection facilities and services and response times. This information is included in **Appendix K** of this Draft Environmental Impact Report (DEIR). Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a) Regulatory Framework

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

- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management (OEM)
- City of Los Angeles General Plan, including
 - Framework Element
 - Central City North Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- Los Angeles Police Department (LAPD) Computer Statistics Unit (COMPSTAT) Program
LAPD Guidelines and Plan Review

(1) State

(a) *California Vehicle Code, Section 21806*

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.¹ This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety....(c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(b) *California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35 at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²

¹ A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

² *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847, <https://caselaw.findlaw.com/ca-court-of-appeal/1719667.html>. Accessed August 22, 2022.

(c) *California Penal Code*

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

(2) **Regional**

(a) *County of Los Angeles Office of Emergency Management*

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.³

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to LAPD using only its own available resources.

(3) **Local**

(a) *City of Los Angeles General Plan*

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the City and guides subsequent amendments of the City's Community Plans Specific Plans, zoning ordinances, and other local planning programs.

Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.J.2-1, Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies**, below. Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services, and includes the following relevant goals, objectives, and policies outlined below in **Table IV.J.2-1**. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police

³ County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>. Accessed August 22, 2022.

services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

**Table IV.J.2-1
Relevant General Plan Framework Element Infrastructure and Public Services Goals**

Framework Element – Chapter 9, Infrastructure and Public Services	
Goal 9I	Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.
<i>Source: City of Los Angeles 2001.</i>	

(ii) Central City North 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 police protection 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 City's Central City North Community Plan (adopted December 15, 2000 and amended on September 7, 2016) contains the following police protection objectives and policies applicable to the Project in Chapter III, Land Use Policies and Programs, Police Protection⁴:

Objective 8-1: Provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.

Policy 8-1.1: Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.

Objective 8-2: Increase the community's and the Police Department's ability to minimize crime and provide adequate security.

Policy 8-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch and the Senior Lead Officer Program), through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, assistance in the formation of new neighborhood watch groups, and regular communication with neighboring and civic organizations.

Policy 8-2.2: Insure that landscaping around buildings be placed so as not to impede visibility.

Policy 8-2.3: Insure adequate lighting around residential, commercial, and industrial buildings in order to improve security.

Policy 8-2.4: Insure that recreational facilities in multiple family residential complexes are designed to provide visible security.

(b) City of Los Angeles Charter

The City Charter at Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.⁵

(c) Administrative and Municipal Codes

Section 22.240 of the Administrative Code requires the LAPD to adhere to the State standards described in Section 13522 of the California Penal Code for the training of police dispatchers. Los Angeles Municipal Code (LAMC) Chapter 5 includes regulations, enforceable by the police, related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors

⁴ Central City North Community Plan.

⁵ See also, Los Angeles Administrative Code Sections 22.212 et. seq.

and the LAFD in the enforcement of the City’s Fire, Building, and Health Codes. The LAPD is also given the power and the duty to protect residents and property and to review and enforce specific security-related mitigation measures in regard to new development.

(d) *Los Angeles Police Department Computer Statistics Unit Program*

The LAPD Computer Statistics Unit (COMPSTAT) Program was created in 1994 and implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.⁶

(e) *LAPD Guidelines and Plan Review*

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD’s *Design Out Crime Guidelines*, which incorporates techniques of Crime Prevention Through Environmental Design (CPTED) and seeks to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to:

Provide on-site security personnel whose duties shall include but not be limited to the following:

- Monitoring entrances and exits;
- Managing and monitoring fire/life/safety systems;
- Controlling and monitoring activities in parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;

⁶ LAPD, COMPSTAT, <https://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/>, Accessed August 22, 2022.

- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

b) Existing Conditions

The LAPD is divided into four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the bureaus encompasses several community police stations. As of January 2023, the departmental staffing resources within the LAPD included 9,235 sworn officers. Based on LAPD’s estimated total City population of 3,908,705, the LAPD currently has an officer-to-resident ratio of 2.4 officers for every 1,000 residents.⁷

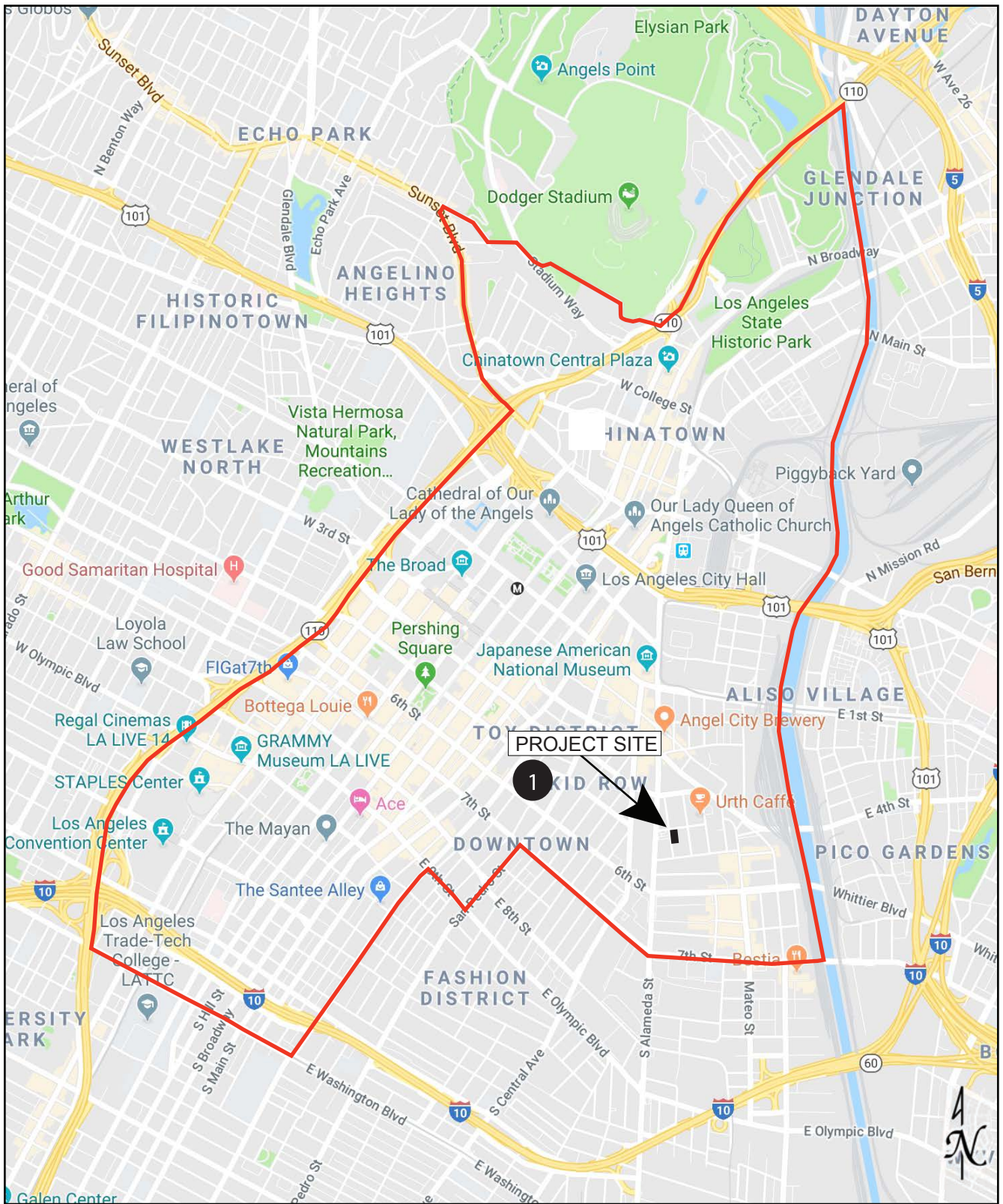
(1) Existing Police Stations

The Project Site is located within the LAPD Central Bureau. The Project Site would be served by the Central Community Police Station, located at 251 E. 6th Street, approximately 0.9 miles west the Project Site, and in, Reporting District (RD) 0159.⁸ **Figure IV.J.2-1, Police Station Location and Central Community Police Station Boundaries Map**, shows the location of the Central Community Police Station in relation to the Project Site. The geographic area of the Central Community Police Station covers approximately 4.5 square miles and consists of 52 Reporting Districts. The service boundaries for the Central Area, as shown on **Figure IV.J.2-1** are: Stadium Way and Pasadena Freeway to the north, Washington Boulevard and 7th Street to the south, the Los Angeles River to the east and the Harbor Freeway to the west. The community has a population of approximately 40,000 people.⁹

⁷ LAPD, COMPSTAT Citywide Profile 01/29/23 to 02/25/23, https://lapdonline.org/crime_mapping_and_compstat. Accessed August 22, 2022.

⁸ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: March 2, 2023.

⁹ Written Correspondence from Michel R. Moore, Chief of Police, Los Angeles Police Department, dated December 6, 2022, **Appendix K** of this Draft EIR.



1 Central Community Police Station: 251 E. 6th Street

— Central Community Police Station Boundary

Source: Google Maps, April 2019.

Figure IV.J.2-1
Police Station Location and Central Community
Police Station Boundaries Map

The Central Police station currently has 284 sworn personnel and 8 civilian support staff assigned with an officer-to-population ratio of one officer per approximately 140 residents.¹⁰ Based on LAPD's estimated total Central Station population of 40,000, the LAPD Central Community Police Station currently has an officer-to-resident ratio of 7.1 officers for every 1,000 residents (284 officers/40,000 residents = 0.0071 x 1,000 = 7.1). There are many specialized support units, divisions, sections and services available to Central Division within the LAPD (i.e., Air Support, Detectives, Bike Unit, K9 and Metro/ SW AT) to support any additional policing needs Central Division may encounter.¹¹ No official standard has been set by the City with respect to officer to population ratio.

(1) Response Times

Central Station's emergency response system is directly linked to the Los Angeles Police Department Communications Division's Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). Communication Division handles only police related calls for the City. The average response time to emergency, high priority calls for service in Central Area during 2022 was 3.5 minutes. The average response time for non-emergency, low priority calls for service in Central Area during 2022 was 30.4 minutes.¹²

(2) LAPD Crime Statistics for Central Area

In 1994, the LAPD incorporated the use of the COMPSTAT (Computer Statistics) Plus Program. The COMPSTAT Unit implements the General Plan Framework Element's goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model. COMPSTAT has been shown to reduce crime occurrences in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.¹³

Table IV.J.2-2 on page IV.J.2-10, provides a comparison of the Central Community Police Station service area and citywide data regarding crimes as reported by the LAPD year to date (YTD) for the same reporting period 2022 based on the most recent data made available by the LAPD Community Relationship Division and COMPSTAT. As shown therein, the crime rate for the

¹⁰ Written Correspondence from Michel R. Moore, Chief of Police, Community Relationship Division, Los Angeles Police Department, dated December 6, 2022, **Appendix K** of this Draft EIR.

¹¹ Written Correspondence from Michel R. Moore, Chief of Police, Community Relationship Division, Los Angeles Police Department, dated December 6, 2022, **Appendix K** of this Draft EIR.

¹² Written Correspondence from Michel R. Moore, Chief of Police, Community Relationship Division, Los Angeles Police Department, dated December 6, 2022, **Appendix K** of this Draft EIR.

¹³ LAPD COMPSTAT program, https://lapdonline.org/crime_mapping_and_compstat. Accessed August 22, 2022.

Central Area has accounted for approximately eight percent of violent crimes in the City and approximately five percent of property crimes in the City.¹⁴

Table IV.J.2-2
Crime Statistics for all Central Area Compared to
Citywide^a
2022 Year to Date (YTD)

CRIME	2022 YTD		
	Central	Citywide	% of City
VIOLENT CRIMES			
Homicide	24	354	6.78
Rape	110	1,295	8.49
Robbery	774	8,521	9.08
Aggravated Assault	1,454	18,644	7.80
Total Violent Crimes	2,362	28,814	8.20
PROPERTY CRIMES			
Burglary	584	13,460	4.34
Motor Vehicle Theft	1,202	24,059	5.00
Burglary from Motor Vehicle	3,311	28,408	11.66
Personal/Other Theft	2,859	25,979	11.00
Total Property Crimes	7,956	91,906	8.66
a. Written Correspondence from Michel R. Moore, Chief of Police, Community Relationship Division, Los Angeles Police Department, dated December 6, 2022, Appendix K of this Draft EIR.			

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

¹⁴ Written Correspondence from Michel R. Moore, Chief of Police, Community Relationship Division, Los Angeles Police Department, dated December 6, 2022, **Appendix K** of this Draft EIR.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate police protection impacts:

(1) Police Impacts

- *The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;*
- *The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and*
- *Whether the project includes security and/or design features that would reduce the demand for police services.*

b) Methodology

The environmental impacts of the Project with respect to police protection are determined based on a Project's need for a new or physically altered police station. While current response times, crime statistics, and congestion at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in the Project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the Project would introduce to the area.¹⁵ Using these statistics, it is possible to estimate the future officer-to-population ratio in the area at project buildout and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing level is not considered adequate, the number required to obtain an adequate level of police protection). The analysis also reviews the Project characteristics and security and/or design features, and the use of on-site and private security provisions in assessing the potential effects of the Project on police services, as the need for additional officers can be reduced through on-site security design features. The increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station. The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact.¹⁶ Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to police protection services that would result from a project, is determined by whether the construction of new or expanded police protection facilities is a reasonably foreseeable direct or indirect effect of the project.

¹⁵ City of Los Angeles, Department of City Planning, *L.A. CEQA Thresholds Guide*, September 2006.

¹⁶ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847, <https://caselaw.findlaw.com/ca-court-of-appeal/1719667.html>. Accessed August 22, 2022.

There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. In the event that the City determines that expanded or new police facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332.

c) Project Design Features

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to police protection service. As discussed, in **Section IV.K, Transportation**, of this Draft EIR, pursuant to PDF TR-1, the Project Applicant would implement a Construction Management Plan that would include provisions for maintaining safety and access to the Project Site during construction. Additionally, the following Project Design Features (PDF) would also be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

- **PDF POL-1:** Prior to and during construction, the Project will implement appropriate temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access by the general public. Regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) would also be provided. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.
- **PDF POL-2:** The Project will provide an extensive security program to ensure the safety of residents, employees, and other visitors to the Project Site. The Project will incorporate strategies in design and planning, as well as active security features. On-site security measures during Project operation will include:
 - On-site security personnel whose duties will include but not be limited to the following:
 - Monitoring entrances and exits;
 - Patrol the perimeter of the property;
 - Control and monitor activities in the public spaces and private outdoor areas;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
 - Install security industry standard security lighting at recommended locations including parking structures, pathways, and facing the adjacent alleyway;

- Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas, lobby areas, outdoor open spaces, and parking areas;
 - Provide adequate lighting of parking areas, elevators, and lobbies to reduce areas of concealment;
 - Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points; and
 - Contact information for on-site security staff will be prominently displayed throughout the Project Site.
- **PDF POL-3:** Prior to the issuance of a building permit, the Project Applicant or its successor will consult with LAPD’s Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project’s land uses or size. The overall commercial square footage provided would be increased by 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and a decrease in the number of bicycle spaces from 180 to 179. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

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

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) *Project*

(i) *Construction*

Project construction would not substantially increase the police service population of the Central Area. Although the daytime population at the Project Site during construction would be temporary, construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. When not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters. Consequently, developers typically take precautions to prevent trespassing through construction sites. To provide such security for the Project during construction, a Work Area Plan will be provided and the Project will provide temporary fencing to be installed around the construction site as a Project Design Feature (see PDF POL-1). Deployment of on-site security guards is also an effective strategy in preventing crime during a project's construction, and the provision for regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) for duration of the construction period would also be part of the Project as a Project Design Feature (see PDF POL-1). With these security measures, there will be less need for local law enforcement services at the construction site, thereby reducing the demand for LAPD services.

Short-term Project construction activities would generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and construction worker trips. Additionally, construction activities may involve temporary lane closures. Other implications of construction-related traffic include increased travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could potentially affect emergency response for emergency vehicles traveling to the Project Site and nearby uses along surrounding streets.

The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on 5th Street and Seaton Street may be required during portions of the construction period. However, signs would be posted advising pedestrians of temporary sidewalk closures and providing alternative routes (e.g., if the sidewalk on the east side of Seaton Street adjacent to the Project Site is closed during the construction period, signs would direct pedestrians to use the sidewalk on the west side of Seaton Street as an alternative route).

Furthermore, the Project is estimated to require a net export of approximately 81,000 cubic yards of soil, and thus, would require a haul route permit. The anticipated outbound haul route from the Project Site would be west on 5th Street, north on Alameda Street, and east on 4th Street to the Golden State Freeway (I-5) northbound on-ramp. The anticipated inbound haul route to the Project Site would be from the I-5 south to the I-10 west, exiting on Exit 15B for Alameda Street, merging onto 14th Street, heading north on Alameda Street, and east on 5th Street. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. Hauling of material from the Project Site would occur on weekdays between 7:00 AM. and 6:00 PM (i.e., a 12-hour

period) and Saturdays between 8:00 AM and 2:00 PM (i.e., an 8-hour period). Because a majority of construction traffic would occur during off-peak hours, and is temporary in nature, Project construction is not expected to cause a significant traffic impact at any of the analyzed intersections. Therefore, construction-related traffic generated by the Project would not significantly impact LAPD emergency response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD (see PDF POL-1), and the Project would implement a Construction Management Plan (see PDF TR-1) in **Section IV.K, Transportation** of this Draft EIR). Further, the Project would consult with LAPD’s Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project (see PDF POL-3).

Overall, upon implementation of the Project Design Features, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. **Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD’s capability to serve the Project Site; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during Project construction would be less than significant; no mitigation measures would be required.**

(ii) Operation

The number of calls for police response relating to residential, commercial and vehicle burglaries, damage to vehicles, traffic-related incidents, any on-site sale and consumption of alcohol and crimes against persons could increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. Design features that deter crime, including an extensive security program to ensure the safety of residents, employees, and other visitors, adequate and strategically positioned functional lighting in parking areas, pathways, and lighting up the adjacent alleyway to enhance public safety and minimizing visually obstructed and infrequently accessed “dead zones,” reduce the demand for police services (see PDF POL-2). Consultation with LAPD’s Crime Prevention Unit regarding the incorporation of any additional security measures will further reduce the demand for police services (see PDF POL-3).

a. Officer-to-Population Ratio

Implementation of the Project would result in an increase of residents, site visitors, and employees within the Project Site. As previously identified (under Existing Conditions) above, the Central Community Police Station has 284 sworn officers serving a population of approximately 40,000 residents.¹⁷ Based on LAPD’s estimated total Central Station population of 40,000, the LAPD

¹⁷ Written Correspondence from Michel R. Moore, Chief of Police, Community Relationship Division, Los Angeles Police Department, dated December 6, 2022, **Appendix K** of this Draft EIR.

Central Community Police Station currently has an officer-to-resident ratio of 7.1 officers for every 1,000 residents (284 officers/40,000 residents = 0.0071 x 1,000 = 7.1). The Project Site is currently occupied by three vacant single-story warehouses and associated parking. Currently there are no employees and no residents at the Project Site. The Project involves the construction of 220 live/work units and 46,548 square feet of commercial uses. As identified in **Section IV.I, Population and Housing**, of this Draft EIR, the Project would generate approximately 518 residents and 120 employees.¹⁸ Following development of the Project the residential service population would increase to 40,518 residents resulting in an approximate officer-to-resident ratio of 7.0 officers per 1,000 residents (284 officers/40,518 residents = 0.0070 x 1,000 = 7.0). This represents a less than one percent (0.10%) change in the officer-per-resident ratio of the service area. Additionally, the officer-to-resident ratio of 7.0 officer per 1,000 residents would still be substantially lower than the citywide ratio of 2.5 officers per 1,000 residents.

The negligible increase in the officer-to-population ratio would not require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the impact would be less than significant.

To further prevent the Project from impacting police services in the Central Community Station area, as noted above, the Project would incorporate crime prevention measures into the Project's design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety, installation of closed-circuit television at select locations including (but not limited to) entry and exit points, lobby areas, outdoor open spaces, and parking areas, and provision of on-site security personnel. The measures are incorporated into the Project as PDF POL-2. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and a secure parking structure enclosed within the building. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive involving the Project or the immediate surrounding vicinity.

Additionally, pursuant to PDF POL-3, the LAPD would review the Project design and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand police protection services. Based on the above analysis, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site or necessitate the construction of new or expanded facilities. **Therefore, the Project would not 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 police protection services.**

¹⁸ However, as the ratio is officer per 1,000 residents the increase in number of employees doesn't impact the ratio.

b. Emergency Access

Emergency access to the Project Site would be provided by the existing street system. The Project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access.

As discussed in **Section IV.K, Transportation**, emergency access would be maintained to the Project Site during construction through marked emergency access points and all traffic and access controls would be addressed by a Construction Management Plan, as indicated in PDF TR-1. During operation, the Project would cause significant impacts at three intersections (Alameda Street/3rd Street (Int. No. 6), Alameda Street/6th Street (Int. No. 8), and Alameda Street/7th Street (Int. No. 9)). However, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access the Project Site when responding to an emergency call. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, prior to the issuance of a building permit, the Project Applicant or its successor will consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project (see PDF POL-3). Based on the above analysis, the Project would not substantially affect emergency response as a result of traffic congestion attributable to the Project. **Therefore, the Project would not 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 police protection services.**

(b) Flexibility Option

Under the Flexibility Option, the commercial square footage provided would be increased to 64,313 square feet within the same building parameters and, in turn, there would be a reduction in the overall number of live/work units for a total of 200 units. As discussed in **Section IV.I, Population and Housing**, of this Draft EIR, approximately 470 new residents would occupy the 200 units on the Project Site, compared to 518 new residents with the Project and the Flexibility Option would generate approximately 145 employees compared to the Project's generation of 120 employees. Following development of the Flexibility Option the residential service population would increase to 40,470 residents resulting in an approximate officer-to-resident ratio of 7.0 officers per 1,000 residents ($284 \text{ officers} / 40,470 \text{ residents} = 0.0070 \times 1,000 = 7.0$). This represents a less than one percent change (0.10%) in the officer-per-resident ratio of the service area. Additionally, the officer-to-resident ratio of 7.0 officers per 1,000 residents would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Overall, the design, configuration, construction, and operation of the Flexibility Option would be comparable to the Project.

Similar to the Project, with incorporation of PDF POL-1 and PDF POL-2, along with the fact that LAPD has no known or proposed plans to expand their police facilities within the Arts District area at this time, the Flexibility Option is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the

Flexibility Option such that it would require construction of new police facilities. Furthermore, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. **Therefore, impacts related to police protection services under the Flexibility Option would be less than significant; no mitigation measures are required.**

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to fire protection facilities, would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to police protection services, would be less than significant without mitigation.

4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

a) Impact Analysis

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 17 Related Projects located in the Project vicinity. Cumulative growth in the Project vicinity includes approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. As such, these Related Projects would have the potential to combine with the Project and cumulatively impact the Central Community Police Station. Based on the boundaries of the Central Community Police Station, shown in **Figure IV.J.2-1, Police Station Location and Central Community Police Station Boundaries Map**, 16 of the Related Projects (identified in **Table III-1 in Section III, Environmental Setting**, of this Draft EIR) are within the jurisdiction of the Central Community Police Station. Related Project No. 10 is outside of the Central Community Police Station jurisdiction.

(1) Project

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each Related Project would be addressed as part of each Related Project's development review process conducted by the City. Should Project construction occur concurrently with Related Projects in close proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan, as indicated in

PDF TR-1 (as well as the required construction management plans for the nearby Related Projects), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each Related Project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, construction-related traffic generated by the Project and the Related Projects would not significantly affect LAPD response within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. **Therefore, the Project's contribution to cumulative impacts on either police protection or emergency services during construction would not be cumulatively considerable, cumulative impacts would be less than significant.**

(b) Operation

The geographic scope of the cumulative police protection analysis encompasses the service area for the LAPD in general, and the Central Community Police Station service area specifically. The Project, in combination with the construction and operation of the 17 related projects, would generate approximately 4,221 full- and part-time jobs and approximately 11,111 residents in the general area of the Project Site as indicated in **Table IV.I-6, Total Cumulative Development**, in **Section IV.I, Population and Housing**, of this Draft EIR. The table presents and quantifies the employee and population generated by the Related Projects. Approximately 16 of the related projects (in addition to the Project), accounting for 4,186 full- and part-time jobs and 10,836 residents are located within the boundaries of the Central Community Police Station. Related Project No. 10 is outside of the Central Community Police Station jurisdiction.

When considered with the Project, cumulative development within the service area of the Central Community Police Station (i.e. not inclusive of Related Project No. 10) would add 4,306 full- and part-time jobs and 11,354 residents to the service population. It is assumed that the addition of the 4,306 full- and part-time jobs and approximately 11,354 residents would create demand for additional officers. The current officer-per-resident ratio for the Central Community Police Station is 7.1 officers for every 1,000 residents ($284 \text{ officers} / 40,000 \text{ residents} = 0.0071 \times 1,000 = 7.1$). Adding the projected cumulative estimates to the existing service population and conservatively assuming that all 16 Related Projects within the jurisdiction of the Central Community Police Station are built as currently proposed, the future officer-per-resident ratio could be 5.5 officers per 1,000 residents ($284 \text{ officers} / 51,354 \text{ residents} = 0.0055 \times 1,000 = 5.5$) for the Central Community Police Station. However, as discussed above, the Project's 518 residents (and 120 employees), would result in an officer-to-population ratio of 7.0 officers per 1,000 residents, a less than one percent decrease in the officer-to-population ratio, which is considered minimal, particularly when compared to the potential cumulative total. Further, this projected cumulative police service ratio of 5.5 officers per 1,000 residents is higher than the citywide ratio of 2.5 officers per 1,000 residents. In addition, over time, LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing and possibly station expansions or new stations construction that may become necessary

to achieve desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time.

Similar to the Project, each Related Project would be subject to the City's routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the Regulatory Framework subsection above, the LAPD would also continue to monitor population-growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the Related Projects would implement project design features similar to the Project and other mitigation measures (as necessary), which would reduce cumulative impacts to police protection services.

In addition to the capabilities of the Central Station to serve the Project Site and surrounding areas, including the Related Projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership, and thus the Project, in combination with growth in demand for police protection services. Further, the Project impact analysis determined the impact on police protection would be less than significant.

As discussed previously, LAPD has no known or proposed plans to expand their fire protection facilities within its Central Area. If a new police station, or the expansion, consolidation, or relocation of an existing station, such as the Central Community Police Station (approximately 3 acres in size currently), were determined to be warranted by LAPD, the Downtown area is highly developed, and the site of a police station would foreseeably be an infill lot less than an acre in size, which would meet the requirements for the use of a Class 32 categorical infill exemption (*State CEQA Guidelines* Section 15332). Development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA. With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(a) above, the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be

speculative and beyond the scope of this document. As such, cumulative impacts on police protection would be less than significant.

Since the impact of the Project on its own would be less than significant, and since all Related Projects will be subject to review by the LAPD, and since existing management and regulatory processes adequately identify and address demand for police protection services, the Project would not contribute to a cumulatively significant impact on police protection services. Therefore, based on the above analysis, cumulative impacts related to police protection services would be less than significant.

(2) Flexibility Option

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each Related Project would be addressed as part of each Related Project's development review process conducted by the City. Similar to the Project, should the Flexibility Option construction occur concurrently with Related Projects in close proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Flexibility Option's Construction Management Plan, as indicated in PDF TR-1 (as well as the required construction management plans for the nearby Related Projects), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Flexibility Option, each Related Project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, construction-related traffic generated by the Flexibility Option and the Related Projects would not significantly affect LAPD response within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. **Therefore, the Flexibility Option's contribution to cumulative impacts on either police protection or emergency services during construction would not be cumulatively considerable, cumulative impacts would be less than significant.**

(b) Operation

The geographic scope of the cumulative police protection analysis encompasses the service area for the LAPD in general, and the Central Community Police Station service area specifically. Adding the projected estimates to the existing service population, using the same formula as above, and conservatively assuming that all 16 Related Projects within the jurisdiction of the Central Community Police Station would be built (i.e., not inclusive of Related Project No. 10), cumulative growth, including the Flexibility Option, would generate approximately 4,229 full- and part-time jobs and approximately 10,788 residents in the service area of the Central Community Police Station. Accordingly, cumulative development under the Flexibility Option could result in a future officer-per-resident ratio of 5.6 officers per 1,000 residents (284 officers/50,788 residents = $0.0056 \times 1,000 = 5.6$) for the Central Community Police Station, which would reduce the officer-per-resident ratio from the current 7.1 officers-per-resident. However, the potential 5.6 officers-per-resident ratio is higher than the citywide ratio of 2.5 officers per 1000 residents. Furthermore,

as discussed above, the Flexibility Option's 470 residents, would result in an approximate officer-to-resident ratio of 7.0 officers per 1,000 residents ($284 \text{ officers} / 40,470 \text{ residents} = 0.0007 \times 1,000 = 7.0$), a less than one percent decrease in the current officer-to-population ratio, which is considered minimal, particularly when compared to the potential cumulative total. In addition, over time, LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing and possibly station expansions or new stations construction that may become necessary to achieve desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time.

Similar to the Flexibility Option, each Related Project would be subject to the City's routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the Regulatory Framework subsection above, the LAPD would also continue to monitor population-growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the Related Projects would implement project design features similar to the Flexibility Option and other mitigation measures (as necessary), which would reduce cumulative impacts to police protection services.

In addition to the capabilities of the Central Station to serve the Project Site and surrounding areas, including the Related Projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership, and thus the Flexibility Option, in combination with growth in demand for police protection services. Further, the Flexibility Option impact analysis determined the impact on police protection would be less than significant.

As discussed previously, the LAPD has no known or proposed plans to expand police facilities or construct new facilities within its Central Area. If a new police station, or the expansion, consolidation, or relocation of an existing station were determined to be warranted by LAPD, the Downtown area is highly developed, and the site of a police station would foreseeably be an infill lot less than an acre in size, which would meet the requirements for the use of a Class 32 categorical infill exemption (*State CEQA Guidelines* Section 15332). Development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA. With regard

to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(a) above, the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection would be less than significant.

Since the impact of the Flexibility Option on its own would be less than significant, and since all Related Projects will be subject to review by the LAPD, and since existing management and regulatory processes adequately identify and address demand for police protection services, the Project would not contribute to a cumulatively significant impact on police protection services. Therefore, based on the above analysis, cumulative impacts related to police protection and service would be less than significant.

b) Mitigation Measures

Cumulative impacts related to police protection services for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to police protection services for both the Project and Flexibility Option were determined to be less than significant without mitigation.