

# **IV. Environmental Impact Analysis**

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## **J.2 Public Services—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 February 3, 2021 and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix I of this Recirculated Draft EIR. 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;
- City of Los Angeles General Plan;
  - Framework Element;
  - Community Plan;
- City of Los Angeles Charter;
- Administrative and Municipal Codes; and

- Los Angeles Police Department Computer Statistics Unit Program LAPD Guidelines and Plan Review.

## (1) State

### (a) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.<sup>1</sup> This section of the California Vehicle Code 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

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<sup>1</sup> 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.

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.

(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.<sup>2</sup>

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.

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<sup>2</sup> *County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management*, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed June 8, 2023.

### (3) Local

#### (a) *Los Angeles General Plan*

##### (i) *Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), 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 on page IV.J.2-5. Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services, and includes the following relevant goals, objectives, and policies outlined 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 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.

##### (ii) *Palms–Mar Vista–Del Rey 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.

**Table IV.J.2-1  
Relevant General Plan Police Protection Goals, Objectives, and Policies:  
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.
<hr/> <p><i>Source: City of Los Angeles, 2001.</i></p>	

The Palms–Mar Vista–Del Rey Community Plan describes specific goals and policies related to police protection services and public safety. Policies and objectives relevant to the Project are as follows:

- Objective 8-1: Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
  - Policy 8-1.1: Review with the Police Department proposals for new development projects and land use changes to determine law enforcement needs and requirements.
- Objective 8-2: Increase the community’s and the Police Department’s ability to minimize crime and provide security for all residents.
  - Policy 8-2.1: Support and encourage community based crime prevention efforts through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, and regular communication with neighborhood and civic organizations.

- Policy 8-2.2: Ensure adequate lighting around residential, especially multi-family commercial and industrial buildings to improve security.
- Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.

*(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.

*(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 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. The intent of COMPSTAT is to reduce the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.<sup>3</sup>

*(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.

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<sup>3</sup> LAPD, COMPSTAT, [www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/](http://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/), accessed June 8, 2023.

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;
- 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**

### **(1) LAPD Service Area and Bureaus**

The LAPD service area covers approximately 468 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley

Bureau.<sup>4</sup> These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD's 21 community police stations.<sup>5</sup>

As of February 2021, the departmental staffing resources within the LAPD included 9,479 sworn officers and 3,099 civilian employees.<sup>6,7</sup> Based on a total City population of 4,015,940, the LAPD currently has an officer-to-resident ratio of one officer for every 424 residents.<sup>8</sup>

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.<sup>9</sup> The West Bureau oversees operations in Hollywood, Olympic, Pacific, West Los Angeles, and Wilshire service areas as well as the West Traffic Division. The West Bureau includes the communities of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.<sup>10</sup>

## (2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within the Pacific Area and is served by the Pacific Community Police Station. As shown in Figure IV.J.2-1 on page IV.J.2-9, the Pacific Community Police Station is located at 12312 Culver Boulevard, approximately 1.5 miles northeast of the Project Site. The Pacific Community Police Station service area covers approximately 25.7 square miles and is bounded by the Santa Monica Freeway to the north, the San Diego Freeway to the east, Century Boulevard to the south, and the Pacific Ocean to the west. The Pacific Community Police Station serves a population of approximately 200,000 persons and is staffed by approximately 208 sworn officers and 16 civilian support staff. Based on the police service population of 200,000 persons, the officer-to-resident ratio is approximately 1.0 officer per 1,000 residents. As such, the officer-to-resident ratio in the Pacific Area is lower than the citywide ratio of 2.4 officers per 1,000 residents.

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<sup>4</sup> LAPD, *Organization Chart*, [www.lapdonline.org/lapd-organization-chart/](http://www.lapdonline.org/lapd-organization-chart/), accessed July 7, 2023.

<sup>5</sup> LAPD, *Organization Chart*, [www.lapdonline.org/lapd-organization-chart/](http://www.lapdonline.org/lapd-organization-chart/), accessed July 7, 2023.

<sup>6</sup> *Written correspondence from Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, February 3, 2021. See Appendix I of this Draft EIR.*

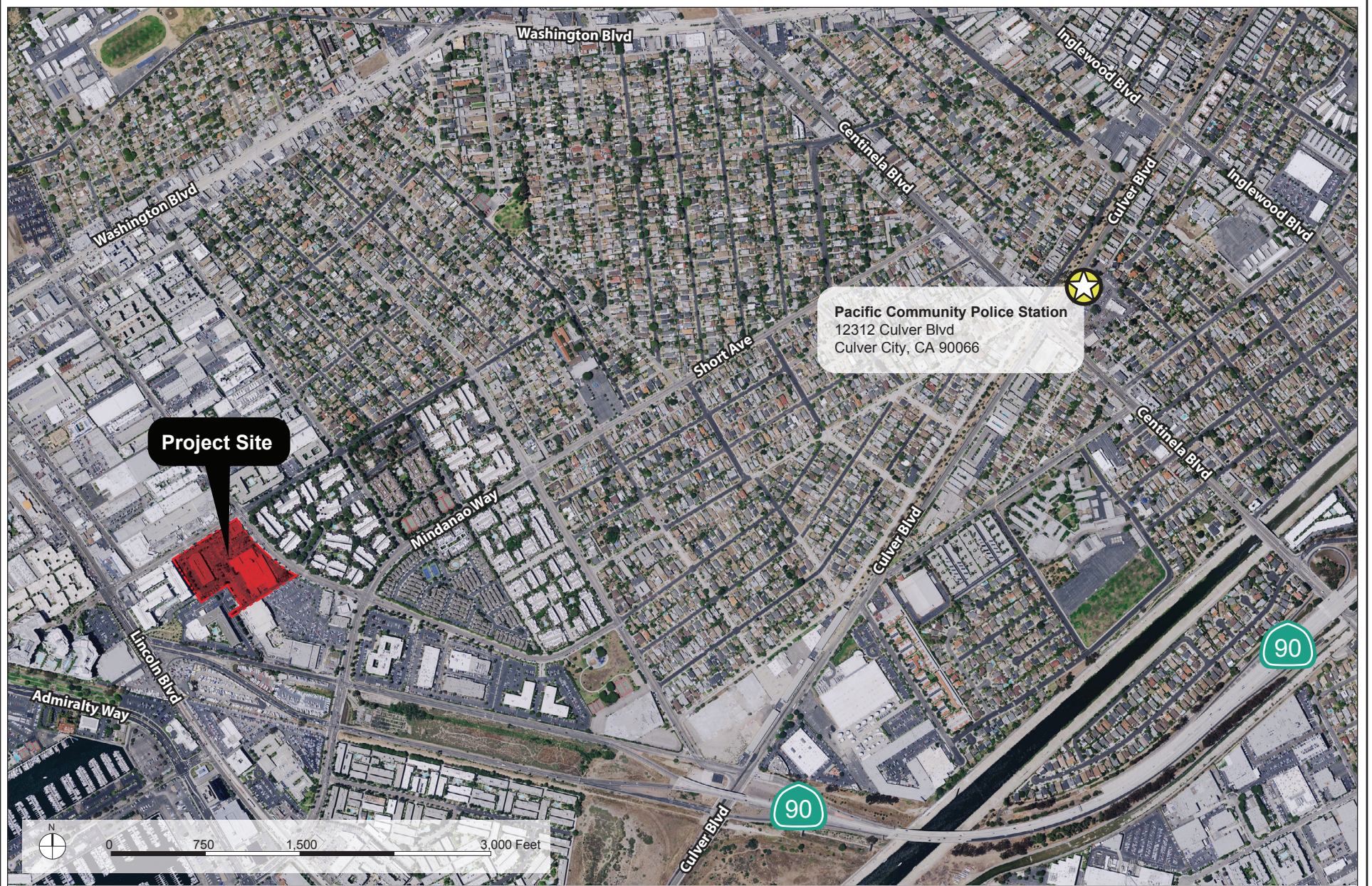
<sup>7</sup> *Written correspondence from Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, February 3, 2021. See Appendix I of this Draft EIR.*

<sup>8</sup> *Written correspondence from Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, February 3, 2021. See Appendix I of this Draft EIR.*

<sup>9</sup> LAPD, *About West Bureau*, [www.lapdonline.org/lapd-contact/west-bureau/](http://www.lapdonline.org/lapd-contact/west-bureau/), accessed June 8, 2023.

<sup>10</sup> *Ibid.*





**Figure IV.J.2-1**  
Police Station Serving the Project Site

The average response time for emergency and non-emergency calls in the Pacific Area in 2022 was 5.6 and 32.4 minutes, respectively.<sup>11</sup>

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to police protection services 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 police protection services.***

For this analysis, the Appendix G Threshold provided above is 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 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate police protection services:

- 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.

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<sup>11</sup> *Written correspondence from Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, February 3, 2021. See Appendix I of this Draft EIR.*

## b. Methodology

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, new or physically altered government facilities. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated population of the Project. The analysis presents statistical averages associated with the police station serving the Project Site and Citywide services and, based on guidance from the LAPD, focuses on the increase in the residential population from the Project. The determination of impact on the capability of existing police services and personnel is based in part on the potential for the annual crimes per resident in the Pacific Area to exceed current averages due to the addition of the Project. Project design features and any mitigation measures that would reduce the impact of the Project on police services are also considered.

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.<sup>12</sup> 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 from a project is determined by whether construction of new or expanded police protection facilities is a reasonably foreseeable direct or indirect effect of the project and, if so, whether it is reasonably foreseeable that such construction would result in physical impacts to the environment.

There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event 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 under CEQA Guidelines Section 15301 or 15332 or be reviewed in a Mitigated Negative Declaration.

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<sup>12</sup> *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal, App. 4th 833, 843, 847.

### c. Project Design Features

The following project design features are proposed with regard to police protection:

- PDF-POL-1:** During construction, the Applicant shall implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures and the documentation shall be made available to the construction monitor.
- PDF-POL-2:** The Project shall include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas.
- PDF-POL-3:** The Project shall provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- PDF-POL-4:** The Project shall provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.
- PDF-POL-5:** The Project shall design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.
- PDF-POL-6:** Prior to the issuance of a building permit, the Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.
- PDF-POL-7:** Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant shall submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

Additionally, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant would implement a work site traffic control plan that would include provisions for maintaining emergency access to the Project Site during construction.

### d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options—Option A and Option B. Under Option A, the

Project proposes the development of 658 multi-family residential units and 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and approximately 13,650 square feet of restaurant space. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. Both development options are evaluated in the following analysis.

***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 would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?***

## (1) Impact Analysis

### *(a) Construction*

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Pacific Area and Pacific Community Police Station. In addition, since the existing uses on the Project Site currently generate a daytime population that may require police protection services, any demand for police protection services generated during construction of the Project would be offset by the removal of the existing uses on the Project Site. Notwithstanding, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1 provided above, temporary security measures, including security fencing, lighting, and locked entry would be implemented to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic, could also potentially affect LAPD response to the Project Site and surrounding area. Specifically, construction activities associated with the Project could affect access for police vehicles along Lincoln Boulevard, Maxella Avenue, and other main connectors and result in travel time delays caused by traffic during the construction phase. However, as discussed in Section IV.K,

Transportation, of this Recirculated Draft EIR, a work site traffic control plan would be implemented during construction of the Project pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the work site traffic control plan would be developed in consultation with the Los Angeles Department of Transportation and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-ways. Construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the vicinity of the Project Site as emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic as provided by California Vehicle Code Section 21806.

Based on the above analysis, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. **As such, construction of 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 service ratios, response times or other performance objectives for police protection services. Impacts on police protection services during construction of the Project would be less than significant.**

*(b) Operation*

As noted above, the Project proposes two development options—Option A and Option B. Under Option A, the Project proposes the development of 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and 13,650 square feet of restaurant space. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space.

As discussed in Section II, Project Description, of this Recirculated Draft EIR, the Project Site is currently occupied by three shopping center-related buildings that together comprise approximately 100,781 square feet. Since the Project Site does not contain any housing units, there are currently no residents on the Project Site that would require LAPD

police protection services. The existing retail and restaurant uses generate a daytime employee population of approximately 218 employees.<sup>13</sup>

Development of 658 multi-family residential units under Option A would result in a net increase of approximately 1,481 residents.<sup>14</sup> In addition, the retail and restaurant uses would generate approximately 82 employees.<sup>15</sup> Overall, Option A would generate an on-site police service population of approximately 1,345 net new persons (residents and employees).

Development of 425 multi-family residential units under Option B would result in a net increase of approximately 957 residents.<sup>16</sup> In addition, the Project's office, retail, and restaurant uses would generate approximately 480 employees.<sup>17</sup> Overall, the Project would generate an on-site police service population of approximately 1,219 net new persons (residents and employees). Therefore, the Project under both Option A and Option B would introduce a new residential, employee, and visitor population to the Project Site, thus increasing the police service population of the Pacific Area.

The Project Site is served by the Pacific Community Police Station located at 12312 Culver Boulevard approximately 1.5 miles northeast of the Project Site. The Pacific

<sup>13</sup> Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the existing retail uses (92,249 square feet) and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the existing restaurant uses (8,532 square feet).

<sup>14</sup> Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "multi-family Residential" population generation rate of 2.25 employees per DU applied to the proposed residential uses (658 DU).

<sup>15</sup> Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the proposed retail uses (13,650 square feet) and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (13,650 square feet).

<sup>16</sup> Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "multi-family Residential" population generation rate of 2.25 employees per DU applied to the proposed residential uses (425 DU).

<sup>17</sup> Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (90,000 square feet), the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the proposed retail uses (20,000 square feet), and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (20,000 square feet).

Community Police Station is staffed by 208 sworn officers and a 16-person civilian support staff. Based on the above, Option A of the Project would generate a greater service population compared to Option B. As such, the Project's estimated net police service population could be up to 1,345 persons, which would increase the existing police service population of the Pacific Area from 200,000 persons to 201,345 persons. Despite the increase in police service population, the officer-to-resident ratio for the Pacific Area would remain at its current level of 1.0 officer per 1,000 residents. Therefore, the Project would not cause a significant change to the officer-to-resident ratio for the Pacific Area.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas. In addition, pursuant to Project Design Features POL-PDF-3, the Project would include proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Furthermore, pursuant to Project Design Feature POL-PDF-4, the Project would provide sufficient lighting in parking areas to maximize visibility and reduce areas of concealment. The Project would also design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. In addition to the implementation of these project design features, which would help offset the Project-related increase in demand for police services, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.

The Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Project-related traffic would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, as provided by Section 21806 of the California Vehicle Code, drivers are to yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon stop and remain stopped until the authorized emergency vehicle has passed. As such, drivers of police emergency vehicles are able to avoid traffic by using sirens and flashing lights to clear a path of travel or by driving in the lanes of opposing traffic. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. Therefore, the traffic generated by the Project would not significantly impact emergency response due to traffic congestion.



Additionally, the Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. Based on the above analysis, the Project would not generate a demand for new LAPD facilities to serve the Project Site and, therefore, LAPD concluded the Project “will not result in the need for new or altered police facilities.”<sup>18</sup> **Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts.**

Furthermore, as described above in the Regulatory Framework, consistent with *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services.

**Based on the above analysis, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Impacts on police protection services would be less than significant.**

## (2) Mitigation Measures

Project-level impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts related to police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant without mitigation.

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<sup>18</sup> *Written correspondence from Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, February 3, 2021. See Appendix I of this Draft EIR.*

## e. Cumulative Impacts

### (1) Impact Analysis

As identified in Section III, Environmental Setting, of this Recirculated Draft EIR, there are 14 related projects located in the vicinity of the Project Site. Of the 14 related projects, 9 of the related projects are located within the City of Los Angeles and fall within the service boundaries of the LAPD Pacific Community Police Station service area. Of the 9 related projects within the LAPD service area, 7 are residential in nature or have residential components. As discussed above, LAPD uses officers per residential population to assess the adequacy of police protection services. As such, these 7 related projects are considered herein.

Related Projects 10 through 13 are located within the City of Culver City, and Related Project 14 is within the County of Los Angeles' jurisdiction. Hence, the need for additional police protection services would be assessed by the City of Culver City and County of Los Angeles in accordance with their respective service guidelines in order to accommodate future population increases in those jurisdictions.

#### *(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 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 developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-ways. In addition, similar to the Project, it is anticipated that each related project would implement standard industry measures to secure the construction site and reduce the potential for theft and vandalism, thereby reducing the demand for police services during construction. In addition, as with the Project, each related project would include standard construction measures such as flag persons which would ensure that emergency access and traffic flow are maintained on adjacent right-of-ways. 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 during construction. As such, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD access within the Project Site vicinity as drivers of police vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Finally, the Project in and of itself would not cause a significant impact to police services during construction. **Therefore, the Project's contribution to cumulative impacts on police protection services during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(b) Operation*

As shown in Table IV.J.2-2 on page IV.J.2-20, growth from the related projects that fall within the boundaries of the Pacific Area is estimated to result in an estimated total service population of 1,604 residents (permanent population).<sup>19</sup> As described above, the Project under Option A would contribute to this cumulative increase by generating an increase in the service population of approximately 1,481 permanent residents. The Project under Option B would contribute to the cumulative increase by generating an increase in the service population of approximately 957 permanent residents. As a result, the Pacific Area's police service population could increase from 200,000 up to 203,085 residents. Despite the increase in police service population, the officer-to-resident ratio for the Pacific Area would remain at its current level of 1.0 officer per 1,000 residents. The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Pacific Area, which could increase based on per capita crime rates. Accordingly, cumulative population growth could increase the demand for LAPD services in the Pacific Area. However, as previously discussed, due to the Project design features that would be implemented as part of the Project and the Project's contribution to the General Fund, the Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site.

Similar to the Project, each related project would be subject to the City's routine permitting process, which includes review by the LAPD to ensure sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the General Plan Framework Element, as discussed in the Regulatory Framework 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 design features similar to the Project, which would reduce cumulative demand for police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate by the City.

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<sup>19</sup> *The population estimates presented herein do not account for the removal of existing uses and their associated daytime/permanent populations and thus are overstated.*

**Table IV.J.2-2**  
**Estimated Residential Service Population from Related Projects within Pacific Area**

<b>No.<sup>a</sup></b>	<b>Project Name/Address</b>	<b>Land Use</b>	<b>Unit/Area</b>	<b>Service Population</b>
1	X67 Lofts 4140 S. Glencoe Ave.	Apartments	67 du	151
2	C1 by CLG 4210 S. Del Rey Ave.	Condominiums	136 du	306
3	R3 by CLG 4091 S. Redwood Ave.	Condominiums	67 du	151
4	G8 by CLG 4040 S. Del Rey Ave.	Apartments	230 du	518
5	INclave Mixed-Use Project 4065-71 Glencoe Ave.	Apartments	49 du	111
7	Stella Phase 2 13488 W. Maxella Ave.	Apartments	65 du	146
8	Thatcher Yard 3233 S. Thatcher Ave.	Affordable Senior Housing	68 du	153
		Affordable Family Housing	30 du	68
<b>Total</b>				<b>1,604</b>
<b>Total Plus Project Option A</b>				<b>3,085</b>
<b>Total Plus Project Option B</b>				<b>2,561</b>
<hr/> <i>du = dwelling units</i> <i>Numbers may not sum precisely due to rounding.</i> <sup>a</sup> <i>Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III., Environmental Setting, of this Recirculated Draft EIR.</i> <sup>b</sup> <i>Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1.</i> <i>Source: Eyestone Environmental, 2023.</i>				

With regard to emergency response, the Project and related projects would introduce new uses in the Project area that would generate additional traffic. Any resulting traffic congestion would have the potential to impact emergency access to the Project Site and surrounding properties. As discussed above, the Project is not anticipated to substantially affect emergency response in the Pacific Area, and the Project would not contribute to a cumulative impact relative to emergency access. Moreover, the drivers of emergency vehicles would continue to have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with California Vehicle Code Section 21806.

Additionally, consistent with the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At

this time, the LAPD has not identified any new station construction or the need for new or expanded facilities in the area as a result of this Project or other projects in the service area and has concluded that the Project “individually or combined with other past, present, or future projects, will not result in the need for new or altered police facilities.”<sup>20</sup> If LAPD determines that new facilities are necessary at some point in the future, 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 CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document.

**Based on the above, the Project would not result in cumulative adverse impacts associated with the provision of new or physically altered government facilities (i.e., police), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, cumulative impacts on police protection services would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts related to police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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<sup>20</sup> *Written correspondence from Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, February 3, 2021. See Appendix I of this Draft EIR.*