

IV. Environmental Impact Analysis

L.2 Public Services – Police Protection

1. Introduction

This section describes the existing police protection services for the Project Site and vicinity, identifies associated regulatory requirements, and evaluates the potential impacts related to implementation of the proposed Project. Specifically, this section addresses the potential environmental impacts of the Project on police protection services in the City of Los Angeles (City). The Project's police protection needs are assessed through consideration of the types of proposed land uses, the demand created by the proposed land uses, and the distance of the Project Site from the nearest police stations. The focus of this analysis is whether the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site are adequate to serve the Project, and the ability of LAPD to provide adequate police protection services to serve the Project while maintaining acceptable service ratios. This section is based on written correspondence from the LAPD, included as Appendix J-2 of this Draft Environmental Impact Report (EIR).

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
- Mutual Aid Operations Plan

- City of Los Angeles General Plan
 - Framework Element
 - Hollywood Community Plan
 - Safety Element
- City of Los Angeles Charter
- City Administrative and Municipal Codes
- LAPD Computer Statistics Unit Program
- LAPD Guidelines and Plan Review

(1) Federal

No federal regulations are relevant to the thresholds discussed below.

(2) State

(a) *California Vehicle Code, Section 21806*

Section 21806 of the California Vehicle Code pertains to emergency vehicles responding to Code 3 incident/calls.¹ 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.

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.

(b) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution 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.” 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 on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates 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 1992–1993 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the Court of Appeals 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

(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.

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

The Office of Emergency Management was established by Chapter 2.68 of the County of Los Angeles Code. It delegates to the County’s Emergency Management Organization the responsibility for organizing and directing the emergency preparedness efforts, including planning and coordinating emergency response plans, overseeing operational readiness for emergency response, training for emergency responses, and providing public education related to emergency response.³

² *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

³ County of Los Angeles, Chief Executive Office, Office of Emergency Management, OEM At A Glance, 2020.

(b) *Mutual Aid Operations Plan*

The County of Los Angeles (County) is required by state law to organize a formal mutual aid agreement between all police departments within its jurisdiction. This agreement is set forth in the Mutual Aid Operations Plan for the County. The Mutual Aid Operations Plan is a reciprocal agreement between signatory agencies (such as the County and City or other local police departments) to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Any formal mutual aid requests by any police department within the County are made with the County Sheriff's Department; however, additional informal agreements may be made directly between the police agencies involved. The Mutual Aid Operations Plan is a formal agreement and has been signed by the Chief of Police of every police department within the County, including the Chief of the LAPD. The Mutual Aid Operations Plan provides a structure of response should an emergency arise, which requires immediate response by more law enforcement personnel than would be available to the LAPD using all other available resources.⁴

(4) Local

(a) *City of Los Angeles General Plan*

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), originally adopted in December 1996 and readopted 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.

Chapter 9 of the Framework Element addresses Infrastructure and Public Services. 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

⁴ County of Los Angeles, Operational Area Response Plan, approved February 17, 1998.

mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

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.

(ii) *Hollywood 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 Framework Element at the local level and consist of both text and an

accompanying generalized land use map. The community plans 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.

(iii) Safety Element

The Safety Element of the General Plan addresses the issue of protection from unreasonable risks associated with natural disasters. The Safety Element provides a conceptual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. It does not specifically address police matters; however, it does identify critical facilities and lifeline systems for the City in case of emergency. Sunset Boulevard and Vermont Avenue, located near and along the Project Site, are selected disaster routes.

(b) City of Los Angeles Charter

The City of Los Angeles Charter, Section 570, gives the LAPD the power and the duty to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The City of Los Angeles 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) City Administrative and Municipal Codes

The City of Los Angeles Administrative Code, Chapter, 11, Section 22.240 requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code for the training of police dispatchers. The Los Angeles Municipal Code (LAMC) Chapter 5, Article 2, includes regulations enforceable by the police related to fire arms, illegal hazardous waste disposal, nuisances (such as excessive noise), and the provision of support to the Department of Building and Safety Code Enforcement inspectors and the Los Angeles Fire Department in the enforcement of the City's Fire, Building, and Health Codes. LAPD is also given the power and the duty to protect residents and property, and to review and enforce specific security-related mitigation measures for new development.

(d) LAPD Computer Statistics Unit Program

The LAPD Computer Statistics (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 multilayer 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.⁵

(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 and seeks to deter crime through the design of buildings and public spaces.⁶ 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.”

⁵ Los Angeles Police Department (LAPD), COMPSTAT, 2021.

⁶ LAPD, Design Out Crime, 2021.

(b) Existing Conditions

(1) LAPD Service Area and Bureaus

The LAPD service area covers 473 square miles with a population of approximately four million residents.⁷ Service is provided by 9,863 sworn officers in 21 area police stations.⁸ Based on the total City population of four million residents, the LAPD currently has an officer-to-resident ratio of approximately 2.5 officers for every 1,000 residents.

LAPD provides police protection services within the City. LAPD divides the City into four bureaus: Central, West, South, and Valley. These four bureaus are further divided into 21 services areas, which are served by the LAPD's 21 community police stations.⁹

(2) LAPD Community Police Station

The Project Site consists of the Kaiser Permanente Los Angeles Medical Center (Medical Center) campus, which is located within the Central Bureau. The term “Medical Center campus” refers to the entirety of the Kaiser Los Angeles facility, which is within a Unified Hospital Development Boundary (see **Figure II-2**, Unified Hospital Development Boundary in Chapter II of this Draft EIR). The Central Bureau includes the following community police stations: Central, Hollenbeck, Newton, Northeast, and Rampart. Within the Central Bureau, the Project Site is served by the Northeast Community Police Station, located at 3353 San Fernando Road, located approximately 2.8 miles northwest of the Project Site. The service area of the Northeast Community Police Station (Northeast Area) spans 29 square miles, encompasses the Project Site, and includes approximately 250,000 residents, 295 sworn personnel, and 16 civilian support staff. Thus, within the Northeast Area of the Central Bureau, the officer-to-resident ratio is approximately one officer for every 1,000 residents, less than half of the Citywide 2.5:1,000 ratio.¹⁰

(3) LAPD Crime Statistics

Table IV.L.2-1 provides crime statistics for the Northeast Area and Citywide for the year-to-date for the week ending April 25, 2020.

⁷ LAPD, COMPSTAT Citywide Profile, 10/11/20 to 11/07/20, 2020.

⁸ LAPD, COMPSTAT Citywide Profile, 10/11/20 to 11/07/2020.

⁹ LAPD, Media Relations Handbook, 2008.

¹⁰ Written correspondence from D.D. Davenport, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, September 17, 2018, to S. Alonso (Dudek), provided in Appendix K-2 of this Draft EIR.

**TABLE IV.L.2-1
CRIME STATISTICS YEAR-TO-DATE 2019 AND 2020**

Violent Crimes	Northeast Area 2020	Northeast Area 2019	Citywide 2020	Citywide 2019
Violent Crimes				
Homicide	5	2	81	80
Rape	11	20	391	492
Robbery	86	73	2,584	3,036
Aggravated Assaults	167	175	4,848	5,090
Total	269	270	7,904	8,698
Property Crimes				
Burglary	193	282	3,965	4,544
Motor Vehicle Theft	309	297	5,646	5,090
BTFV	533	522	9,268	9,698
Personal/Other Theft	355	474	8,243	10,909
Total	1,390	1,575	27,122	30,241
Total Crimes	1,659	1,845	35,026	38,939
Arrests				
Homicide	2	3	101	90
Rape	3	3	87	100
Robbery	27	16	839	882
Aggravated Assault	83	100	2,734	2,850
Burglary	18	17	598	597
Larceny	40	65	1,142	1,626
Motor Vehicle	22	32	884	983
Total	195	236	3,761	3,922

SOURCES: LAPD, COMPSTAT Northeast Area Profile 03/29/20 – 04/25/20, 2020; LAPD, COMPSTAT Citywide Profile 3/29/20 to 4/25/20, 2020.

As shown in Table IV.L.2-1, the Northeast Area had a total of 1,659 crimes and the City had a total of 35,026 crimes from year-to-date April 25, 2020. Based on the 295 sworn personnel in the Northeast Area, the crime-to-officer ratio is approximately 6 crimes to 1 officer. Based on the 9,863 sworn officers in the City, the crime-to-officer ratio is approximately 4 crimes to 1 officer. Thus, the Northeast Area has a higher crime-to-officer ratio than the City as a whole. Further, given the 250,000 residents in the Northeast Area

and a total of 1,659 crimes, the crime to resident ratio is 7 crimes to 1,000 residents. Comparatively, the City the crime per resident ratio is 9 crimes to 1,000 residents.

(4) Emergency Access

According to the Safety Element, Sunset Boulevard, which bisects portions of the Project Site, and Vermont Avenue, which is located on the Project Site's eastern boundary, are selected disaster routes.¹¹ Emergency vehicles currently access the Project Site via local roadways. As described in Section IV.M, Transportation, of this Draft EIR, key roadways providing vehicular access to the Project Site include the following:

- North–South Roads
 - Alexandria Avenue
 - Edgemont Street
 - L Ron Hubbard Way
 - New Hampshire Avenue
 - Vermont Avenue
- East–West Roads
 - Barnsdall Avenue
 - Sunset Boulevard

¹¹ City of Los Angeles, Safety Element of the Los Angeles City General Plan, 1996.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the Project would have a significant impact related to police protection if it would:

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.

This analysis relies on the Appendix G Thresholds. The analysis uses factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The L.A. CEQA Thresholds Guide states three criteria for consideration:

- 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

LAPD evaluates impacts to police protection services on a project-by-project basis, taking into account the ability of police personnel to adequately serve the existing and future population, including residents, workers, and daytime and nighttime visitors. Potential impacts to police protection services are evaluated in this Draft EIR based on existing police services for the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis also reviews the Project characteristics and project design features, including the use of on-site and private security, in assessing the potential effects of the Project on police services, as the need for additional officers can be reduced through on-site security and related project design features. Based on these criteria, a determination was made as to whether the existing police facilities could

accommodate the additional demand for police protection services resulting from the Project without the need for a new facility or the alteration of existing facilities. The determination of impact on existing police services and personnel is based on the potential for the annual crimes per resident in the Northeast Area to exceed current averages due to the addition of the Project.

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.¹² 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 an EIR. The ultimate determination of whether a significant impact to the environment related to police protection services will 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.

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 under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration.

c) Project Design Features

The following project design features (PDFs) will be incorporated into the Project to reduce impacts on police services:

PDF-POL-1: During construction, Kaiser Permanente shall implement appropriate 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 (e.g., nighttime hours, weekends, and holidays) shall also be provided. During construction activities, the Project Contractor shall document the security measures, and the documentation shall be made available to the Construction Monitor.

As discussed in Section IV.M, Transportation, of this Draft EIR, the Project also includes a Construction Staging and Traffic Management Plan (Project Design Feature **PDF-TRF-1**), which would include provisions for maintaining emergency access to the Project Site during construction.

¹² *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal, App. 4th 833, 847

d) Analysis of Project Impacts

Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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?

(1) Impact Analysis

(a) Construction

Construction activities associated with implementation of the proposed Project would occur in a variety of locations, with buildout anticipated for the year 2030. There is the potential for Project construction to create an increase in demand for police protection services, as construction sites can be sources of attractive nuisances, can provide hazards, and can invite theft and vandalism. When not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. This could result in an increase in the demand for police protection services. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep trespassers out. Furthermore, Project Design Feature **PDF-POL-1** would provide security on the Project Site, as needed and appropriate, during all phases of construction with security fencing, lighting, and locked entry to secure the Project Site during construction, regular security patrols during non-construction periods, and other appropriate temporary security measures. Each of these measures would be implemented by Kaiser Permanente and would reduce the need for police protection services during the Project's construction phase.

Project construction could also potentially impact the provision of LAPD services and police response in the Project vicinity as a result of construction impacts to surrounding roadways. As discussed in Section IV.M, Transportation, of this Draft EIR, no greater significant traffic impacts are anticipated to occur during construction. Although construction activities would be short-term and temporary, the Project would implement Project Design Feature **PDF-TRF-1**, which implements a Construction Staging and Traffic Management Plan approved by the City. The Construction Staging and Traffic Management Plan approval would ensure that adequate and safe access remains available within and near the Project during construction activities. Appropriate construction traffic control measures (e.g., detour signage to redirect pedestrians, scheduling receipt of construction materials to non-peak travel periods, and coordinating deliveries to reduce the potential of trucks waiting to unload for protracted periods of

times) would be implemented, as necessary, to reduce construction traffic and ensure that there is adequate emergency access to the Project Site and that traffic flow is maintained on adjacent rights-of-way.

During construction, it is expected that emergency vehicles will continue to use the surrounding street system (particularly North Vermont Avenue and Sunset Boulevard) even though some travel lanes along certain portions of some roadways may be temporarily used for construction staging and/or material delivery. Specifically, as previously discussed under Existing Conditions, vehicular access to the Project Site, including access for emergency vehicles, would be provided via Alexandria Avenue, Edgemont Street, L Ron Hubbard Way, New Hampshire Avenue, Vermont Avenue, Barnsdall Avenue, and Sunset Boulevard. Project construction would not interfere with these roadways, including Sunset Boulevard as the selected disaster route. If required, drivers of emergency vehicles are also trained to utilize center turn lanes, or travel in opposing through lanes to pass through crowded intersections or streets. Drivers of emergency vehicles also have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic. These options could be employed on streets and intersections potentially affected by the Project's construction in a manner that would not impede emergency travel by police emergency vehicles. Thus, the priority given to emergency vehicles on the right-of-way and driver training allow emergency vehicles to negotiate typical street conditions in urban areas, including areas near any temporary travel lane closure(s).

Due to the temporary nature of construction and the project design features, Project construction would not substantially affect emergency response and would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Additionally, the Project would comply with State law and Project Design Features **PDF-POL-1** and **PDF-TRF-1**. **Therefore, Project construction would not result in adverse physical impacts associated with the construction of new or altered facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Impacts to police services from Project-related construction activities would be less than significant.**

(b) Operation

The Project involves the expansion of the existing Medical Center campus by replacing facilities and adding new buildings. The Project would result in a net increase of 401,100 square feet of nonresidential floor area under Option A and 433,100 square feet of

nonresidential floor area under Option B. In addition to the typical safety concerns associated with buildings being visited by the public, hospitals have several specific security concerns including the protection of property, assets, medical equipment, and drugs; protection of patients, including incapacitated patients; and safe control of violent or unstable patients. For security emergencies, the existing Medical Center campus has a Security Services and Command Center Operation, available 24 hours a day, 7 days a week.¹³ Patients must first dial 911, then call the Security Services. As such, LAPD would still be called for response; however, the Security Services and Command Center Operation would provide additional personnel on site. Kaiser Security Services and Command Center Operation would also serve the proposed expanded areas of the Medical Center campus.

Although the Project does not involve residential development that would increase the area's population, Project employment potentially could indirectly result in a slight residential population growth within the LAPD's jurisdiction by the creation of employment opportunities that could draw in new employees not already living in this jurisdiction. Ultimately, the slight increase in on-site and Citywide population could result in increased calls for police protection services. As discussed in further detail in Section IV.K, Population and Housing, the Project would result in 1,807 new employees by 2030 buildout.¹⁴ Conservatively assuming that all 1,807 new employees would move from their place of residence to the Northeast Area, a 1,807-resident increase would represent a 0.72 percent increase in the total number of residents served by the LAPD in the Northeast Area. As previously discussed, the existing officer-to-resident ratio in the Northeast Area is 1 officer to 1,000 residents. Upon implementation of the Project, that ratio would remain 1 officer to 1,000 residents. Therefore, this potential increase in residents would not substantially affect police response times or result in the need for new police facilities.

Using the Northeast Area's ratio of 7 crimes per 1,000 residents, the Project could potentially generate 13 additional annual crimes. This represents a 0.78 percent increase in crimes per year. Utilizing the crime to officer ratio of 6 crimes to 1 officer in the Northeast Area, the Project would require 2 additional officers. However, it is recognized that LAPD determines the need for new officers based on a variety of factors, which could be influenced by shifts in station and/or patrol boundaries, ongoing staff changes, service populations, crime statistics, and technological enhancements. As such, the crimes that could be generated by the Project would represent a nominal increase and would not substantially affect police response times nor the need for new police facilities.

¹³ Kaiser Permanente, Los Angeles Medical Center Services and Amenities, 2021.

¹⁴ Hesse, M., RE: A0147: LAMC Aesthetics – Net Growth Staff Increase, email from M. Hesse (Senior Project Manager, Kaiser Permanente) to R. Thomas (Dudek), May 29, 2019.

With respect to emergency access, the Project would be consistent with all LAMC design, street cross-sections, street turning radii, signage, and other applicable requirements that regulate emergency vehicle access. Kaiser Permanente would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. As such, emergency access to the Project Site and surrounding uses would be maintained at all times, and the increase in traffic generated by the Project would not significantly impact the ability of police vehicles to serve the Project Site. In addition, during the plan check phase, LAPD and other City Departments will review the Project plans. Adherence to these requirements would ensure that adequate emergency access is provided and that potential impacts are less than significant.

Based on the above considerations, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Northeast Area where the Project Site is located. Furthermore, the Project would not result in a significant impact to LAPD access to the Project Site and emergency response. **Therefore, operation of 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, in order to maintain LAPD's capability to serve the Project Site. Impacts to police services from Project operation would be less than significant.**

(2) Mitigation Measures

Impacts related to police protection facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts related to police protection facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

As indicated in Chapter II, Environmental Setting, of this Draft EIR, there are 85 related projects (related projects) in the vicinity of the Project Site. A cumulatively significant impact related to police protection services could occur as a result of population growth within the LAPD service area due to the Project and related projects. A number of related

projects, which could increase population growth, include apartment, retail, restaurant, hotel, condominium, and office uses. As described above, construction activities associated with the Project would be short term and would take precautions to prevent trespassing through construction sites through security fencing, lighting, and locked entry to secure building sites during construction, regular security patrols during non-construction periods, and other appropriate temporary security measures (Project Design Feature **PDF-POL-1**). Once operational, the Project's 1,807 employees would not change the officer-to-resident ratio and could generate a 0.78 percent increase in crimes per year. Given the limited nature of construction and inclusion of Project Design Feature **PDF-POL-1**, and nominal potential increase of crime, the Project would not substantially affect police response times nor the need for new policies facilities.

Nonetheless, this slight increase in on-site and Citywide population, along with the increase in citywide population resulting from related projects, could result in increased calls for police protection services. As previously discussed in Section IV.K, Population and Housing, of this Draft EIR, the related projects and Project (10,975 residential units and 45,476 employment opportunities), would increase the service population of the Northeast Area from 250,000 residents to 325,917 residents. This is a conservative estimate because it assumes the related projects with nonresidential uses would increase the population size served in the Northeast area. The new residents would result in an officer-to-resident ratio of 1 officer to 1,000 residents, which is the same as under the existing conditions. Therefore, the Project with related projects would not cumulatively increase the demand for police protection services.

Using the Northeast Area's ratio of 7 crimes per 1,000 residents, the Project and related projects could potentially generate 75 additional annual crimes. This represents a 4.6 percent increase in crimes per year. Using the crime-to-officer ratio of 6 crimes to 1 officer, in the Northeast Area, the Project and related projects would require 13 additional officers. However, it is recognized that LAPD determined the need for new officers based on a variety of factors, which could be influenced by shifts in station and/or patrol boundaries, ongoing staff changes, service populations, crime statistics, and technological enhancements. As such, the crimes that could be generated by the Project and related projects would represent a nominal increase in crime and would not substantially affect police response times or require new police facilities.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Northeast Area. Traffic from the Project and related projects have the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects would be consistent with all LAMC design, street cross-sections, street turning radii, signage, and other applicable requirements that regulate emergency vehicle

access. Additionally, the Project would implement Project Design Feature **PDF-TRA-1** to reduce potential construction traffic and parking impacts and comply with the City's Transportation Demand Management strategies. Further, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Additionally, the Project would implement Project Design Feature **PDF-POL-1** to ensure that the Project provides sufficient lighting of building entries, walkways, and other points of building entry to allow for pedestrian orientation and clearly identify a secure route of entry during construction. As with the Project, the applicants of the related projects would be required to incorporate appropriate safety features into the design and construction of their respective projects to minimize the potential for crime and to maximize safety, ultimately minimizing the need for police protection services. Each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City in order to adequately address police protection service demands.

Furthermore, the project applicants of the Project and related projects would be required to consult with LAPD during the plan check phase to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. It is anticipated that related projects would implement design features similar to the Project and other necessary measures, which would reduce cumulative impacts to police protection services to less-than-significant levels. As with the Project, effects on LAPD from the increase in population generated by cumulative development of the related projects would be mitigated on a case-by-case basis, with applicants proposing new residential development required to pay property taxes, and go through plan check with LAPD.

The Project and each of the related projects also would be individually subject to comply with all applicable State, LAPD, Department of Building and Safety, and other City requirements regarding emergency access. As is the case under the existing condition, emergency vehicles would access the Project Site and each of the related projects directly from surrounding roadways. As such, emergency access to the Project vicinity would be maintained at all times, and cumulative traffic would not significantly impact emergency vehicle response.

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 of the California Constitution described in Subsection 3.b.(1) above, the

obligation to provide adequate police protection is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including service enhancement that may become necessary to achieve the required level of service, would be identified and additional resources allocated according to the priorities at the time. 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 under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative at this time and is beyond the scope of this document.

Based on the above considerations, the Project's contribution to cumulative impacts to police protection services would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to police protection services were determined to 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 or included, and the impact level remains less than significant.

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