

IV. Environmental Impact Analysis

K.2. Public Services – Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services within the Project area and analyzes potential impacts on police services that could occur due to construction and operation of the Project. The analysis focuses on the City of Los Angeles Police Department (LAPD) facilities that currently serve the Project Site and the ability of the LAPD to provide police protection services to the Project. The analysis is based, in part, on information provided by the LAPD.¹ This information includes statistical data regarding police protection facilities, services, and response times, and is included in Appendix L-2 of this Draft EIR. Additional information included in this analysis is also based on the California Vehicle Code (CVC), Los Angeles General Plan Framework, City of Los Angeles Charter and Administrative Municipal Codes, Central City North Community Plan, and the LAPD crime control model computer statistics (COMPSTAT) database, and other data on the LAPD website.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) *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 1992–93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well

¹ Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department (LAPD), letter correspondence dated December 29, 2017. Additional email correspondence dated March 7, 2018. Provided in Appendix L-2 of this Draft EIR.

as other 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 services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

(b) *California Vehicle Code*

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.² This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear 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.

(2) **Regional**

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

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

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate

² 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.

³ County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>. Accessed April 2020.

response by more law enforcement personnel than would be available to LAPD using only its own available resources.

(3) Local

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

The City of Los Angeles General Plan Framework Element (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision or strategy 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.⁴

Chapter 9 of the General Plan Framework addresses infrastructure and public services that are applicable to the Project. The following objectives and goals relate to police services and law enforcement:⁵

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 services 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 9.14.7: 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.

(b) *Central City North Community Plan*

The Land Use Element of the City's General Plan is comprised of 35 Community Plans. The City's Community Plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. 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 City's Community Plans implement the City's General Plan Framework Element at the local level. The City's Community Plans express the goals,

⁴ City of Los Angeles Department of City Planning, *City of Los Angeles General Plan, Citywide General Plan Framework Element*, 1995.

⁵ City of Los Angeles Department of City Planning, *City of Los Angeles General Plan, Citywide General Plan Framework Element*, Chapter 9, Infrastructure and Public Services.

objectives, policies, and programs to address growth within each of the individual communities and depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project Site is located within the boundaries of the Central City North Community Plan.

The Central City North Community Plan, last updated in January 2003, contains the following police protection objectives and policies applicable to the Project:⁶

Chapter III, Land Use Policies and Programs, Police Protection:

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

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

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

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

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

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

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

(c) *City of Los Angeles Charter and Administrative and Municipal Codes*

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter, Article V, Section 570; the City of Los Angeles Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2.

Article V, Section 570 of the City Charter gives the power and duty to LAPD to enforce the penal provisions of the City Charter and City ordinances, as well as state and federal law. The City Charter also gives responsibility to the officers of the LAPD to act as peace

⁶ City of Los Angeles, *Central City North Community Plan*, originally adopted in 2000, amended in 2016. Accessed March 2018.

officers, as defined by state law, and the power and duty to protect lives and property in case of a disaster or public calamity. Section 22.240, Adherence to State Standards for Recruitment and Training of Public Safety Dispatchers, of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter V regulations 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 Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures for new development.

b) Existing Conditions

(1) LAPD Service Areas and Bureaus

The LAPD provides police protection services in the City of Los Angeles, covering approximately 472.93 square miles and includes 21 community police service areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. The LAPD also has a variety of specialized units including Special Weapons and Tactics (SWAT), Off-Road Enforcement, Mounted Unit, Special Operations Support Division, Air Support Division, Art Theft Detail, K-9 Unit, Animal Cruelty Task Force, Gangs and Narcotics Division, and Specialized Enforcement Section (Motors and Commercial Enforcement).⁷

As of April 2020, the departmental staffing resources within the LAPD included 10,005 sworn officers.⁸ Based on a total City population of 4,029,741, the LAPD currently has an officer-to-resident ratio of approximately 2.5 officers for every 1,000 residents.⁹

The Project Site is located within the LAPD's Central Bureau. The Central Bureau covers a 65 square mile area with roughly 842,700 people that includes such diverse communities as Downtown, the Arts District, Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium, and Griffith Park. It borders Burbank, Glendale, Pasadena, and South Pasadena. The Central Bureau oversees operations in five LAPD Areas, including the Central, Hollenbeck, Newton, Northeast and Rampart Areas. The Central Bureau also oversees operations at the Central Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the Central Bureau.¹⁰

⁷ LAPD, Inside the LAPD, http://www.lapdonline.org/inside_the_lapd. Accessed March 2018.

⁸ LAPD, COMPSTAT Citywide Profile 03/29/20-04/25/20. Accessed May 2020.

⁹ $(10,005 \text{ officers}) / (4,029,741 \text{ population} / 1,000 \text{ population}) = 2.48 \text{ officers per } 1,000 \text{ residents, rounded up to } 2.5$.

¹⁰ LAPD, Central Bureau, http://www.lapdonline.org/central_bureau/content_basic_view/1908. Accessed March 2018.

(2) LAPD Central Community Police Station

The Project Site is served by the Central Community Police Station, located at 251 East 6th Street, approximately 1.30 miles northwest of the Project Site, as shown in **Figure IV.K.2-1**, *Location of Central Community Police Station*.

The Central Community Police Station serves an area of approximately 4.5 square miles (e.g., the LAPD Central Area) which includes Chinatown, Little Tokyo, Arts District, South Park-Entertainment District, Central City East, Flower Mart, Toy District, Historic Core, Financial District, Artists Lofts, Olvera Street, Jewelry/Broadway District, Civic Center, and portions of the Fashion District communities.¹¹ As shown in Figure IV.K.2-1, the boundaries of the LAPD Central Area are generally the 110 Freeway to the north, Washington Boulevard and 7th Street to the south, the Metrolink Railroad tracks to the east, and the 110 Freeway to the west. The Central Community Police Station has approximately 370 sworn personnel and 30 civilian support staff assigned and provides service to a residential population of approximately 40,000 residents.¹² The LAPD Headquarters Facility and LAPD Security Division are also within the LAPD Central Area and would be readily available to assist the Central Community Police Station in any investigations or unusual occurrences. Furthermore, as with all municipal police departments in Los Angeles County, the LAPD participates in the mutual aid agreements with other law enforcement agencies within the County, for the shared use of police personnel and resources during emergency and/or conditions of extreme peril. According to the LAPD, there are no current plans to expand the Central Area Division or to build a new facility to service the Central Area.¹³

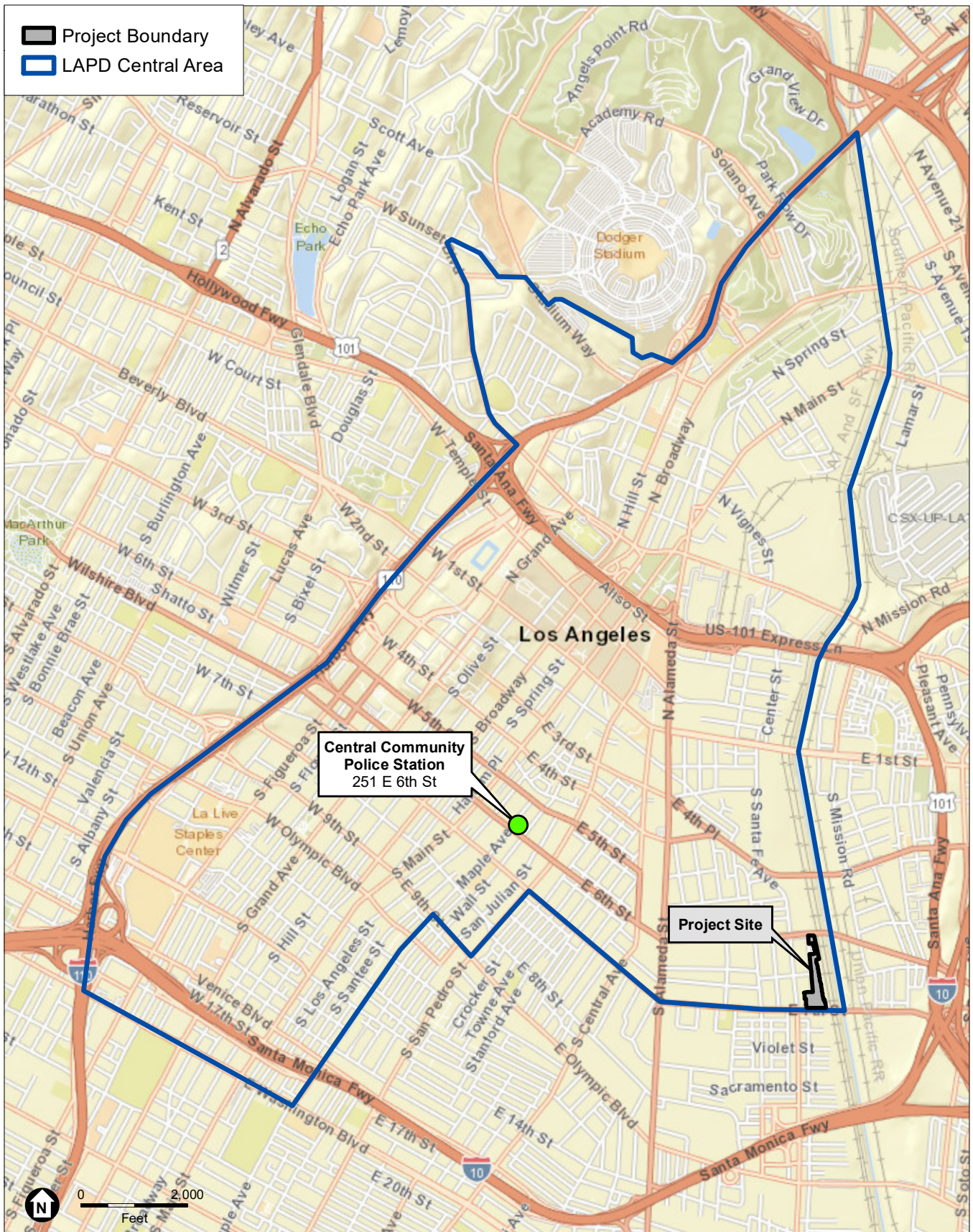
(3) LAPD Crime Statistics

Currently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the General Plan Framework Element (Framework Element) goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model.

¹¹ LAPD, Central Bureau, http://www.lapdonline.org/central_bureau/content_basic_view/9259. Accessed March 2018.

¹² Officer Christopher Gibson, letter correspondence dated December 29, 2017.

¹³ Officer Christopher Gibson, email correspondence dated March 7, 2018.



SOURCE: ESRI 2018; LAPD, Central Bureau 2017

670 Mesquit

Figure IV.K.2-1
Location of Central Community Police Station

Table IV.K.2-1, *Population, Officer, and Crime Comparison (2017)*, lists the resident population, number of sworn officers, officer/resident ratio, number of crimes, and crimes per 1,000 residents for the Central Area and Citywide for the year 2017, the latest annual data available. The average response time for the Central Area during 2016 was 2.7 minutes and 13.7 minutes for emergency and non-emergency calls for services, respectively.¹⁴ The LAPD does not support consideration of Citywide average response times as a measure of police protection services.¹⁵

**TABLE IV.K.2-1
POPULATION, OFFICER, AND CRIME COMPARISON (2017)**

Service Area	Square Miles	Resident Population	Sworn Officers	Officers/ Resident Ratio	Annual Reported Crimes	Crimes per 1,000 Residents
Central Community Police Station	4.5 ^a	40,000 ^a	370 ^a	1/108 ^a	6,669 ^a	167 ^b
Citywide ^c	472.9 ^c	4,007,905 ^c	10,029 ^c	1/400 ^d	129,587 ^c	32 ^e

NOTE(S):

- ^a Officer Christopher Gibson, letter correspondence dated December 29, 2017. Provided in Appendix L-2 of this Draft EIR.
- ^b (6,669 crimes) / (40,000 residents / 1,000 residents) = 167 crimes per 1,000 residents.
- ^c Crime data is provided for 2017, the latest whole year for which annual crime data was available. LAPD, COMPSTAT Citywide Profile, 12/04/17 to 12/31/17, <http://assets.lapdonline.org/assets/pdf/123117cityprof.pdf>. Accessed November 2018. Citywide data represents the most recent year (2017) from which complete data was available.
- ^d 4,007,905 residents/10,029 officers = 400 residents / 1 officer.
- ^e (129,587 crimes) / (4,007,905 residents / 1,000 residents) = 32 crimes per 1,000 residents.

SOURCE: ESA, 2020.

(4) Existing Project Site Features

The Project Site is currently developed with existing one- to four-story freezer, cold storage, and dry storage warehouses with associated office space, loading docks, and surface parking. The Project Site does not include gates to block access from the public to the Project Site after operating hours. The streets surrounding the Project Site include street lights, and surrounding buildings and surface parking lots also include street lights.

¹⁴ Officer Christopher Gibson, letter correspondence dated December 29, 2017.

¹⁵ Officer Christopher Gibson, additional email correspondence dated April 9, 2018.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to 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.

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

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

b) Methodology

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to serve existing and future population in the Project vicinity adequately, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services and potential need for new or expanded police facilities. The analysis presents statistical data for the Central Area and Citywide, including the ratio of crimes to residents and the ratio of sworn police officers to residents. The ratio of police officers to residential population is used by LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for the Project. LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population.

The Project's police service population, which was calculated using Police Service Population Conversion factors in the 2006 L.A. CEQA Thresholds Guide, was used to

determine the population increase resulting from the Project. The 2006 L.A. CEQA Thresholds Guide's Police Service Population Conversion factors account for the number of residents and both commercial and residential visitors who would be present at any one time due to, or generated by, the Project. While the police service population calculates service population for non-residential uses, the LAPD does not provide crime rates or police officer service ratios for non-residential uses and does not use such ratios to measure service levels.

In consideration of the above factors, a determination is made as to whether the LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAPD was consulted and its responses were incorporated regarding 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. 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 will result from a project is determined by whether from the construction of new or expanded fire protection and emergency medical 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. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event In the event that the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

c) Project Design Features

(1) Construction

Refer to Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) in Section IV.L, *Transportation*, of this Draft EIR. In addition, the following Project Design Feature related to police protection services during Project construction will be implemented as part of the Project:

- **POL-PDF-1: Security Features During Construction.** Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed

around the perimeter of the construction site, and security lighting will be provided in and around the construction site.

(2) Operation

The following Project Design Feature related to police protection services during Project operation will be implemented as part of the Project:

- **POL-PDF-2: Security Features During Operation.** The following security features will be implemented during Project operation:
 - Controlled access of the multifamily residential uses, office uses, hotel units, and the residential and hotel common open space areas.
 - Access to commercial and restaurant uses and publicly accessible open space areas will be unrestricted during business hours, but public access will be discontinued after businesses have closed.
 - Facility operations will include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services.
 - Project Site security will include provision of 24-hour video surveillance and full-time security personnel.
 - Duties of the security personnel will include, but would not be limited to, assisting residents and visitors with Project Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property.
 - Project design will include lighting of entryways, publicly accessible areas, and common building and open space residential areas for security purposes.
 - Public amenity areas, including the Mesquit Paseo, Elevated Pedestrian Walkway and River Balconies, Entry Plazas, Northern Landscaped Area, and the Deck (under the Project with the Deck Concept) will be generally open to the public from 6 A.M. to 11 P.M., and will otherwise have restricted access through fencing and gates designed in compliance with LAMC and RIO design standards. These areas will be well lit at night and regularly patrolled by security personnel.

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 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?

(1) Impact Analysis

(a) Construction Impacts

During construction, equipment, building materials, vehicles, and temporary offices would be temporarily located on the Project Site, which could be subject to theft or vandalism. Therefore, when not properly secured, construction sites can result in an increase in demand for police protection services. Consequently, developers typically take precautions to prevent trespassing through construction sites, such as installation of temporary fencing around the construction site to keep potential trespassers out and deployment of roving security guards to prevent problems during a project's construction. When such precautions are taken, there is typically less of a need for local law enforcement at a construction site.

As provided in Project Design Feature POL-PDF-1, these potential impacts would be addressed through a number of security measures to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. Construction fencing with gated and locked entry would be installed around the perimeter of the construction site. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or abused. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project's potential need for police protection services during the construction phase.

A Construction Traffic Management Plan (TRAF-PDF-1) subject to review and approval by the City of Los Angeles Department of Transportation (LADOT) will be incorporated into the Project. The Construction Traffic Management Plan would include elements such as street closure information, detour plans, haul routes, and staging plans and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police responses.

In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to California Vehicle Code Section 21806. Furthermore, Project construction activities would be temporary and intermittent, and construction haul routes would require approval by the Los Angeles Department of Transportation (LADOT) prior to construction. Therefore, Project construction would not result in substantial adverse impacts to emergency response times and emergency access. The Project Site is largely available to access from the adjacent roadways. The majority of the construction staging would occur within the Project Site, limiting potential conflicts with traffic on local streets. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to police protection services would be considered less than significant due in part to the following:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD and LAFD (refer to Project Design Feature TRAF-PDF-1 in Section IV.L, *Transportation*, of this Draft EIR);
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC.

As there would be private security personnel, no additional officers from LAPD would be needed to monitor the Project Site during construction outside of existing officers that patrol the area. Any potential LAPD officers needed to patrol the Project Site would be from the existing officers at the Central Community Police Station. Additionally, the various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. **Therefore, impacts resulting from Project construction would not create the need for new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service. As such, impacts would be less than significant.**

(b) *Operational Impacts*

(i) *Project Police Service Population and Crime Rate*

As shown below in **Table IV.K.2-2, *Project Increases in Police Service Population***, the Project would introduce new resident, visitor, and customer populations and would increase the existing number of employees at the Project Site, which would increase the demand for police protection from LAPD.

**TABLE IV.K.2-2
PROJECT INCREASES IN POLICE SERVICE POPULATION**

Land Use	Amount of Development	Generation Factor (population per unit)	Police Service Population
Residential Uses			
Studio, One-, Two-BR Units	291 units	2.41 persons/unit ^a	702
Three-BR Units	17 units	2.41 persons/unit ^a	41
<i>Subtotal Residential Population Generated</i>			743
Non-Residential Uses^b			
Office	944,055	4 emp/ksf	3,777
Retail	107,294	2 emp/ksf	215
Arts District Central Market	28,858	4 emp/ksf	116
Restaurant	89,577 sf	4 emp/ksf	359
Hotel	236 rm	0.5 emp/rm	118
Studio/Gallery/Gym	155,765	1 emp/ksf	156
<i>Subtotal Non-Residential Population Generated</i>			4,741
Existing Uses			
Freezer/Cooler	161,854 sf	1 emp/ksf	(162)
Office	11,157 sf	4 emp/ksf	(45)
Dry Storage	32,382 sf	0.33 emp/ksf	(11)
<i>Subtotal Estimated Existing Population</i>			(218)
Net Total			5,266

NOTE(S):

sf = square feet; rm = room; emp = employee; ksf = 1,000 square feet

^a Based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).^b The employee generation factors are taken from Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning. Note that the studio/gallery/gym uses the “Health Club” factor provided in Table 1.

SOURCE: ESA, 2021.

As shown in Table IV.K.2-2, based on the Police Service Population Conversion Factors from the L.A. CEQA Thresholds Guide, the Project would generate approximately 743 new residents. The increase in population from 40,000 to 40,743 residents in the LAPD Central Area would reduce the officer to resident ratio from one officer per 108 residents to one officer per 110 residents, assuming no additional officers were hired.¹⁶ This is still significantly above the Citywide average of one officer per 400 residents and does not

¹⁶ 40,000 existing residents + 743 new residents = 40,743 residents/370 existing officers = one officer per 110 residents.

account for benefits provided through Project security personnel and features. Given the one officer per 110 resident ratio with inclusion of the Project, compared to the one officer per 400 resident ratio Citywide, and the Project's security personnel and design features, it appears unlikely that additional officers would be needed to serve the Project. Nonetheless, if it were determined that additional officers would be needed, and if hiring of officers was solely based on maintaining existing service ratios, the Project contribution would be approximately seven additional officers.¹⁷ Although the true need for additional hires would be determined by LAPD through their periodic assessment of staffing in light of multiple factors, seven additional officers would increase the existing officer total of 370 to 373 total officers or an increase of approximately 1.9 percent of officers at the Central Community Police Station.¹⁸

As noted above, LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population. Nonetheless, if the non-residential population were combined with the residential population (police service population), the Project would generate a net total increase of 5,266 people (residents, employees, visitors) who would require police protection services.

(ii) Project Police Service Impact Assessment

It is recognized that LAPD determines the need for new officers based on a variety of factors, which could be influenced by the current ratio of officers to residents in the area, shifts in station and/or patrol boundaries, ongoing staff changes, service populations, crime statistics and technological enhancements.

As provided in Project Design Feature POL-PDF-2, the Project would incorporate a security program to ensure the safety of Project residents and visitors. The buildings would include controlled access to the multi-family residential units, hotel units, office uses, and open space areas common to the residential and hotel uses. Access to commercial and restaurant uses, publicly accessible open space areas, and paseos would be unrestricted during business hours, with public access discontinued after businesses have closed. Facility operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. On-site private security would include provision of 24-hour video surveillance and security personnel. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property, including publicly accessible areas. The Project design would also include lighting of entryways, publicly accessible areas, and common building and open space areas associated with the residential units for security purposes. The Project's numerous security features would be reviewed for further suggestions by the LAPD.

¹⁷ 743 new residents X (one officer per 108 residents) = 7 additional officers.

¹⁸ 7 additional officers/370 existing officers = 1.9 percent.

These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services.

Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards that cannot be lowered by emergency vehicles, etc.) that could impede emergency vehicle access to the Project Site and in the Project vicinity. While the Project would include vacation of Mesquit Street by extending Mesquit Street to the south of Jesse Street to allow for the new publicly accessible paseo, the Project would not require substantial narrowing of adjacent public rights-of-way that may be hazardous to roadway travelers as the space would be intended for pedestrians and would restrict vehicle access. As discussed in further detail in Section IV.K.1, Public Services-Fire Protection, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate emergency vehicle access. These same roads would be used by LAPD vehicles to access the Project Site. Compliance with applicable Los Angeles Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Direct emergency access would be provided along 6th Street and Mesquit Street, including the Mesquit Paseo, as well as 7th Street. The intersection of Jesse Street and Mesquit Street would have removable bollards, at the northern end of the Mesquit Paseo, for emergency services access and for turnaround access. As such, emergency access to the Project Site would be maintained at all times.

It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of freeways, arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the local Project vicinity. Emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to CVC Section 21806 and multiple station response. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

In consideration of the above, and given that LAPD has no known or proposed plans to expand their LAPD Central Area police facilities,¹⁹ the Project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the Project and require construction of new police facilities. Even if expansion of the Central Community Police Station (currently approximately three acres in size) was determined warranted by LAPD, and was foreseeable, the Station site is already developed, and expansion of the Station on an

¹⁹ Officer Christopher Gibson, email correspondence dated March 7, 2018.

infill lot would be anticipated to include development at a scale that is unlikely to result in significant unavoidable impacts. Projects involving the expansion of a police station are anticipated to be addressed pursuant to CEQA through categorical exemptions or (mitigated) negative declarations since they would likely be relatively small additions on infill parcels. Finally, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's general funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate.²⁰

Based on the above analysis, the Project would not generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project would not result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, 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, and impacts would be less than significant.

(c) *Project with the Deck Concept*

As stated in Chapter II, *Project Description*, the Applicant seeks to construct a Deck that extends over a portion of the off-site Railway Properties east of the Project Site. Like the Project, the Project with the Deck Concept would implement Project Design Feature POL-PDF-1 and include a number of security measures to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. Construction fencing with gated and locked entry would be installed around the perimeter of the construction site. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or abused. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project with the Deck Concept's potential need for police protection services during the construction phase. Implementation of the Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) would also be implemented to reduce the potential for incidents that would require police responses. With the inclusion of private security personnel, it is anticipated that no additional officers from LAPD would be needed to monitor the Project Site during construction. Thus, the conclusions regarding impact significance presented above are the same and apply to the Project and the Project with the Deck Concept. As such, impacts under the Project with the Deck Concept would be less than significant.

²⁰ *City of Hayward v. Board of Trustees* (2015) 242 Cal. App. 4th 833.

Impacts associated with police protection services would be essentially the same under the Project or the Project with the Deck Concept. The Project and the Project with the Deck Concept would include the same access, circulation, and supporting police protection features (Project Design Feature POL-PDF-2), as described above. Additionally, the Deck would not include additional household units and residential population to the Project Site that are not already included in the Project analysis above. Thus, the conclusions regarding impact significance presented above are the same and apply to the Project and the Project with the Deck Concept. **As such, impacts under the Project with the Deck Concept would be less than significant.**

(2) Mitigation Measures

Impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding 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.

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 141 related projects that are anticipated to be developed in the Project vicinity. For purposes of this analysis of cumulative impacts on police protection services, only those projects located within the Central Community Police Station service area (e.g., Central Area) are considered as related projects. Projects located in other service areas would be served by their respective police stations. Of the 141 related projects, 115 are located within the Central Area.²¹ The related projects include residential, office, commercial/retail/restaurant, and hotel uses. **Table IV.K.2-3, *Cumulative Population for Police Services***, shows the estimated cumulative residential and non-residential populations for the related projects in the Central Area.

²¹ Related Project Nos. 6, 11, 12, 20, 22, 23, 27, 28, 39, 40, 49, 51, 56, 57, 68, 69, 70, 71, 72, 117, 119, 121, 123, 124, 132, and 134 are located outside the LAPD's Central Area and are not included in the cumulative growth calculations.

**TABLE IV.K.2-3
CUMULATIVE POPULATION FOR POLICE SERVICES**

Land Use	Amount of Development^a	Generation Factor (population per unit)	Residential Population	Non-Residential Population
Related Projects				
Residential	32,728 du	2.41 persons/unit ^b	78,874	
Office	13,325 ksf	4 emp/ksf ^c		53,300
Retail	4,924 ksf	2 emp/ksf ^c		9,848
Hotel	3,352 rooms	0.5 emp/room ^c		1,676
Total Related Projects			78,874	64,824
<i>Proposed Project</i>			743	4,523
Related Projects + Project			79,617	69,345

NOTE(S):

du = dwelling units; ksf = 1,000 square feet

^a Based on Table III-1, Related Project List, in Chapter III, *Environmental Setting*, in this Draft EIR, minus the 26 related projects located outside LAPD's Central Area (e.g., Related Project Nos. 6, 11, 12, 20, 22, 23, 27, 28, 39, 40, 49, 51, 56, 57, 68, 69, 70, 71, 72, 117, 119, 121,123, 124, 132, and 134).

^b Based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).

^c The employee generation factors are taken from Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning.

SOURCE: ESA, 2021.

(a) Construction Impacts

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each project's respective environmental review process conducted by the City. Similar to the Project, each related project would be required to ensure that adequate emergency access to the property and neighboring properties is maintained. Related projects would also be required to implement similar security measures as under the Project to limit access to construction areas, such as hiring private security, installing construction fencing, and including security lighting. The specific type and combination of construction site security features would depend on the phase and duration of construction. The related projects would need to coordinate emergency accessibility with LAPD and/or LADOT, as necessary, to their respective sites to ensure that emergency access would be maintained through temporary lane closures or marked emergency access points. Construction-related traffic generated by the Project and related projects would not adversely affect LAPD service in the Project vicinity as drivers of police and emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, cumulative construction impacts would be less than significant.

(b) Operational Impacts

As indicated in Table IV.K.2-3, the Project (743 residents) plus the related projects (78,874 residents) would increase the service population of LAPD's Central Area by an estimated 79,617 residents.

The new residents generated by the Project and related projects would result in an officer-to-resident ratio of 1:323, assuming no additional officers were hired.²² Therefore, the Project, together with related projects would cumulatively generate increased demand for police protection services from the Central Community Station compared to existing conditions.

However, these are conservative estimates because the related projects' generated populations would not all be net new residents and non-residents (i.e., these population projections do not take into account existing development and the associated existing resident and non-resident populations to be removed due to the development of the related projects). Additionally, the projections do not account for related projects that may not proceed beyond the application phase or ultimately may not be built, may be or built at reduced densities. The projections also do not consider the reduction in criminal activity that is likely to occur as a result of development of the related projects, which include residential, office, commercial/retail/restaurant, and hotel uses as the related projects would seek to activate their frontages and increase the amount of activity around their respective sites. The commercial related projects, such as those with office, retail, and restaurant components, would also be expected to provide on-site security, personnel, and/or design features for their visitors and patrons.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Central Area. Traffic from the Project and related projects has 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 are expected to include design features and may include measures that would serve to reduce traffic congestion. Furthermore, as previously stated, 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, similar to the Project, the related projects would contribute revenue to the City's General fund, which could fund LAPD expenditures as necessary to offset the

²² 40,000 existing residents + 79,617 new residents = 119,617 residents/370 existing officers = 323 residents / 1 officer, or one officer per 323 residents.

cumulative incremental impact on police services. Through this process, LAPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project and related projects would contribute.

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, 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, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and other projects in the service area. 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 typically between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Based on the above, cumulative operational impacts would be less than significant.

(c) *Project with the Deck Concept*

As cumulative impacts associated with police protection services for related projects would be the same under the Project and the Project with the Deck Concept, and as access, circulation, and supporting police protection features, would be essentially the same for the Project and the Project with the Deck Concept, the analysis and conclusions regarding cumulative impact significance presented above are the same under the Project with the Deck Concept. **As such, cumulative impacts on police protection services would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts with regard 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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