

IV. Environmental Impact Analysis

J.2. Public Services – Police Protection

1. Introduction

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

2. Environmental Setting

a) Regulatory Framework

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

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

(1) State

(a) *California Vehicle Code, Section 21806*

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

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

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

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

(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

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.*

conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

(2) Regional

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

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.²

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

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Framework Element*

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

Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.J.2-1, Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies**, below. Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services, and includes the following relevant goals, objectives, and policies outlined below in Table X. 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

² *County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, Accessed December 2021.*

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

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

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

(ii) Central City Community Plan

The Land Use Element of the City’s General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City’s General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans’ texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans’ maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

Chapter III of the City’s Central City Community Plan (adopted January 8, 2003), Chapter III, Land Use Policies and Programs, Government and Public Facilities, Police Protection contains the following police protection objectives and policies applicable to the Project:³

Objective 5-1: To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.

³ *City of Los Angeles, Department of City Planning, Central City Community Plan, 2003.*

Objective 5-2: To inform developers, design professionals, and the public of the possible reduction of criminal opportunities when crime prevention principles are developed during the initial planning stages of a development.

(b) City of Los Angeles Charter

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

(c) Administrative and Municipal Codes

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

(d) Los Angeles Police Department Computer Statistics Unit Program

The LAPD COMPSTAT was created in 1994 and implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.⁴

(e) LAPD Guidelines and Plan Review

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD's Design Out Crime Guidelines, which incorporates techniques of Crime Prevention Through Environmental Design (CPTED) and seeks to deter crime through the design of buildings and public spaces (LAPD 2017d). 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;

⁴ LAPD, COMPSTAT, http://www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed February 18, 2021.

- Controlling and monitoring activities in the parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings; and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

b) Existing Conditions

(1) LAPD Service Area and Bureaus

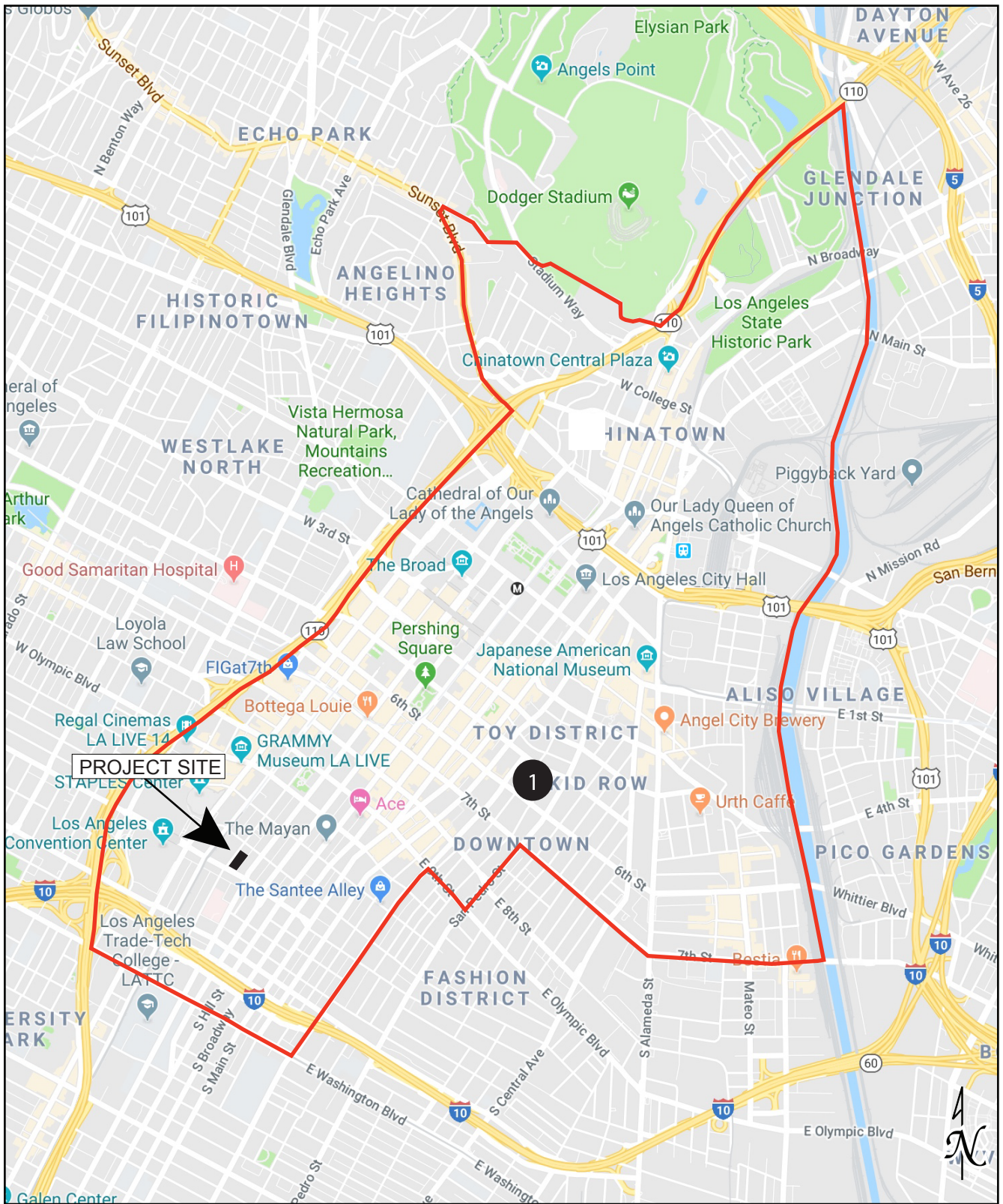
The LAPD provides police protection services in the City and is divided into four geographically-defined bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD’s 21 community police stations. As of June 2019, the departmental staffing resources within the LAPD included 10,005 sworn officers. Based on LAPD’s estimated total City population of 4,007,147, the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.⁵

The Project Site is located in the LAPD’s Central Bureau. The Central Bureau covers a 65-square-mile area with roughly 842,700 people and includes the communities of Downtown, Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium, and Griffith Park.⁶ The Central Bureau oversees operations in five LAPD Areas, including the Central, Hollenbeck, Newton, Northeast, and Rampart areas. The Central Bureau also oversees operations of the Central Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the Central Bureau.⁷

⁵ Los Angeles Police Department, *COMPSTAT Citywide Profile 5/26/2019 to 6/22/2019*, accessed July 11, 2019.

⁶ Los Angeles Police Department, *Central Bureau Map*.

⁷ Los Angeles Police Department, *About Central Bureau Website*, accessed: July 11, 2019.



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

— Central Community Police Station Boundary

Source: Google Maps, September 2018.

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

(2) LAPD Community Police Station

The Project Site is currently served by the Central Community Police Station, located at 251 E. 6th Street, approximately 1.9 roadway miles northeast of the Project Site, within the Reporting District (RD) 0182,⁸ as shown in **Figure IV.J.2-1, Police Station Location and Central Community Police Station Boundaries Map**. The Central Community Police Station serves an approximately 4.5-square-mile area (the LAPD Central Area) and is responsible for all police operations in downtown Los Angeles.⁹ The Central Area includes Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Financial District, Arts District, Olvera Street, Jewelry District, the Convention Center, and the Fashion District neighborhoods. As shown on **Figure IV.J.2-1**, the boundaries of the Central Area are Stadium Way and the Pasadena/Harbor Freeway to the north, Washington Boulevard and 7th Street to the south, the Los Angeles River to the east, and the Harbor Freeway to the west.

The Central Community Police Station has 370 sworn personnel and 30 civilian support staff and provides service to a population of approximately 40,000 residents.¹⁰ When situations arise requiring increased staffing, additional officers can be called in from other LAPD community police stations.¹¹ Furthermore, as with all municipal police departments in Los Angeles County, the LAPD participates in the Mutual Aid Operations Plan for Los Angeles County, a reciprocal agreement between signatory agencies including local police departments to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. LAPD has not identified any current plans to expand the Central Community Police Station or increase the number of personnel assigned to the Central Area.¹²

Table IV.J.2-2, Population, Officer, and Crime Comparison (2019 Year to Date), lists the resident population, number of sworn officers, officer-to-resident ratio, number of crimes, crime/resident ratio, and crime/officer ratio for the Central Area and citywide. As shown in **Table IV.J.2-2**, the officer-to-resident ratio within the Central Area and citywide is 1:108 and 1:401, respectively; the number of crimes per 1,000 residents within the Central Area and citywide is 87.9 and 14.3, respectively; and the number of crimes per officer within the Central Area and citywide is 9.5 and 5.7, respectively, to date for 2019.

⁸ Correspondence from Captain Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, dated July 15, 2019. See **Appendix I** of this Draft EIR.

⁹ Los Angeles Police Department, Central Community Police Station, About Central Area Website, accessed July 11, 2019.

¹⁰ Correspondence from Captain Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, dated July 15, 2019. See **Appendix I** of this Draft EIR.

¹¹ Los Angeles Police Department, Los Angeles Police Department Manual, Volume 4, 120.40.

¹² Correspondence from Captain Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, dated July 15, 2019. See **Appendix I** of this Draft EIR.

**Table IV.J.2-2
Population, Officer, and Crime Comparison (2019 Year to Date)**

Service Area	Square Miles	Resident Population	Officers	Officer: Resident Ratio	Crimes	Crime per 1,000 Residents	Crime: Officer Ratio
Central Area ^a	4.5	40,000	370	1:108	3,514	87.9	9.5:1
Citywide ^b	473	4,007,147	10,005	1:401	57,093	14.3	5.7:1
<p><i>a Los Angeles Police Department, COMPSTAT Central Area Profile 5/26/2019 to 6/22/2019, accessed July 11, 2019.</i></p> <p><i>b Los Angeles Police Department, COMPSTAT Citywide Profile 5/26/2019 to 6/22/2019, accessed July 11, 2019.</i></p>							

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

Table IV.J.2-2 on provides a comparison of the Central Community Police Station service area and citywide data regarding crimes as reported by the LAPD year to date (YTD) for 2019 based on the most recent data made available by the LAPD Community Relationship Division and COMPSTAT. LAPD's Central Area had the highest number of violent and property crime increases in the City. As shown in **Table IV.J.2-2**, the Central Area has a higher ratio of officers per resident but experiences both a higher number of crimes per resident and per officer. This percentage has remained essentially consistent for at least the past three years¹³.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State *CEQA Guidelines* Appendix G (Appendix G), the Project could have a significant impact related to police service if it were to:

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

¹³ LAPD COMPSTAT program.

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

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

b) Methodology

The environmental impacts of the Project with respect to police protection are determined based on a Project's need for a new or physically altered police station and whether those facilities would cause significant environmental impacts. While current response times, crime statistics, and the LOS at surrounding intersections are relevant background information, these data alone are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in the Project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-resident ratio in the area, and the number of persons that the Project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-resident ratio in the area at project buildout and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing level is not considered adequate, the number required to obtain an adequate level of police protection). The need for additional officers can be reduced through on-site security design features. The increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station. If new facilities or physically-altered police stations are required, the analysis would then assess whether the construction would cause significant environmental impacts.

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.¹⁴ To the extent a project generates demand for additional police services that results in the need to construct new facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact needs to be evaluated within the project EIR and mitigated (if feasible), if found to be significant. The ultimate determination of whether a significant impact to the environment related to police services would result from a project is determined by whether construction of new or expanded police facilities is reasonably foreseeable as a direct or indirect effect of the project.

¹⁴ *City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.*

There are no current capital improvement plans for the construction or expansion of police facilities in the LAPD's Central Area. Therefore, the City makes the following assumptions based on existing zoning standards and historical development of police facilities, that in the event the City determines that expanded or new police facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332, Negative Declaration or Mitigated Negative Declaration.

c) Project Design Features

The following Project Design Features would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

- **POL-PDF 1:** During construction, the Project shall implement a Work Area Plan that will involve temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access by the general public. Regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.
- **POL-PDF-2:** Prior to the issuance of a building permit, the Project applicant shall submit Project plans to LAPD for review and incorporate the recommended crime prevention features. Specifically, the Project shall:
 - Provide 24-hour 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; and
 - Controlling and monitoring activities in the parking facilities.
 - Provide secured building access/design to residential areas (electronic keys specific to each user);
 - 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 and parking areas;
 - Maintaining all security camera footage for at least 30 days, and providing such footage to LAPD as needed;
 - Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;

- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points;
 - Design public spaces to be easily patrolled and accessed by safety personnel;
 - Design entrances to, and exits from the building, to be open and in view of surrounding sites; and
 - Limit visually obstructed and infrequently accessed “dead zones.”
- **POL-PDF-3:** Prior to the issuance of a demolition permit, the Applicant or its successor shall develop an Emergency Procedures Plan to address emergency concerns and practices for each construction phase and ongoing during operations. The plan shall include access routes, gate access codes, and any additional information required to facilitate potential LAPD response to the Project Site and shall be subject to review by LAPD.

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, 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 are temporary and would therefore, not be expected to generate a permanent population increase that would increase the demand for police service in the Central Area. Additionally, the demand for police protection services during construction of the Project would be offset by the removal of the existing commercial industrial uses on the Site. Nevertheless, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. However, consistent with standard construction best practices, as detailed in POL-PDF-1, the Project would prepare a Work Area Plan, which would require temporary fencing to be installed around the construction site to prevent trespassing and low-level security lighting and locked entries. Furthermore, the Project would utilize regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) for the duration of the construction period (see POL-PDF-1) to reduce opportunities for theft and vandalism. Such measures would minimize any increase in demand for police protection over existing conditions.

Project construction activities could also potentially impact LAPD police protection services and response times within the Central Area due to construction impacts on the surrounding roadways.

However, as discussed in **Section IV.K, Transportation**, of this Draft EIR, traffic generated by construction workers and trucks would occur primarily during off-peak hours and travel lanes adjacent to the Site would be maintained in each direction or safety measures (such as flagmen) would be implemented to ensure safe travel on the adjacent streets. Furthermore, most construction staging would occur on the Project Site; thus, limiting the potential for the slowing of traffic on area streets and the potential for affecting LAPD emergency response. Additionally, construction-related traffic generated by the Project would not significantly impact LAPD emergency response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, as detailed in **Section IV.K**, a Construction Management Plan, which would be subject to review and approval by the City of Los Angeles Department of Transportation (LADOT), would be prepared for the Project to ensure adequate and safe access both within and near the Project Site during construction activities. In accordance with this plan, emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD.

Based on the above, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. In addition, Project construction would not cause a substantial increase in emergency response times as a result of increased traffic congestion. As such, Project construction would not require the construction of new or physically altered government facilities, in order to maintain LAPD's capacity to serve the Project Site. **Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts and construction-related impacts on police protection services would be less than significant.**

(b) *Operation*

(i) *Service Population and Crime Rates*

The Project Site would continue to be served by the Central Community Police Station, located at 251 E. 6th Street, approximately 1.9 roadway miles northeast of the Project Site. Operation of the Project would introduce a new residential, employee, and visitor population to the Project Site and increase the police service population of the Central Area.¹⁵ As detailed in **Section IV.I, Population and Housing**, of this Draft EIR, the Project would result in an increase of 328 residents at the Site. With the increase of approximately 328 residents from the Project, the residential service population would increase to approximately 40,328 residents. Given this increase, there would be a need for approximately three additional sworn officers to maintain the existing officer-to-resident population service ratio of 1:108. If the LAPD does not hire any new officers for the Central Area, the officer-to-resident population service ratio would be reduced to 1:109. With implementation of the Project, the resulting service ratio of 1:109 would still be well

¹⁵ When calculating service ratios, LAPD considers only the residential service population of the service area.

above the citywide average of 1:401 and would represent an incremental change of approximately 0.5 percent from existing conditions. Thus, the Project would not substantially reduce the officer-to-resident ratio in the Central Area.

Based on the assumption that the annual crime rate would remain constant at 87.9 crimes per 1,000 residents, the Project's residential service population could potentially generate approximately 27 new crimes per year. This would increase the annual number of crimes reported in the Central Area from 3,514 to 3,541 reported crimes per year, an increase of approximately 0.7 percent. Additionally, the proposed hotel and commercial uses of the Project, such as retail and restaurant/bar, could increase the number of crimes reported in the area. If the LAPD does not hire any new officers for the Central Area, the number of crimes per officer would increase from 9.5 crimes per officer to 9.6 crimes per officer, an increase of approximately 1.1 percent. Thus, the Project would not substantially increase the number of reported crimes or the number of crimes per officer in the Central Area.

Furthermore, the Project would incorporate numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, pursuant to Project Design Feature POL-PDF-2, the Project would design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; lobby areas to be visible from public streets or entry ways; publicly accessible facilities to be located in convenient and accessible locations; and public spaces to be easily patrolled and accessed by on-site security personnel. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and a secure parking structure enclosed within the building. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive involving the Project or the immediate surrounding vicinity, which in turn would minimize the need for new or physically altered facilities.

(ii) Emergency Access

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including W. Pico Boulevard and S. Hope Street. Travel lanes would be maintained in each direction throughout the operation of the Project, and emergency access would not be impeded. Furthermore, the Project would not greatly affect emergency vehicles as police units are most often in a mobile state and normally have a variety of options to avoid traffic.

In addition, prior to issuance of a demolition permit, the Central Area Commanding Officer would be provided with an Emergency Procedures Plan that would include access routes and any additional information that may facilitate police response to the Project Site (see POL-PDF-3). Operation of the Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. The Project would also not permanently alter the existing roadways adjacent to or within the vicinity of the Site, such as through the removal or re-striping of lanes, that could potentially result in a change to the emergency access of surrounding properties. Accordingly, Project operation,

including traffic generated by the Project, would not cause a substantial increase in emergency response times to the Project Site or within the Central Area.

(iii) Conclusion

Based on the above, the Project would not be expected to significantly alter the officer-to-resident ratio or amount of crime in the Central Area. Accordingly, 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 include design features and security measures that would decrease the number of service calls the LAPD would be expected to receive for the land uses proposed for the Site. In addition, the Project would not adversely affect LAPD emergency response as a result of roadway or access alteration or increased traffic congestion attributable to the Project. Accordingly, the addition of a new police facility or the expansion, consolidation, or relocation of an existing facility, would not be anticipated or needed to maintain police service to the Project Site. Furthermore, if a new police station or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, the Central City community is highly developed and the site of a new police station would likely be on an infill lot with its own environmental clearance. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that requires mitigation.¹⁶ Additionally, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City General Fund. The Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. **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 and operation-related impacts on police protection services would be less than significant.**

(2) Mitigation Measures

Impacts regarding police protection services would be less than significant. 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.

¹⁶ *Hayward Planning Association et al. v. Board of Trustees of the California State University, Court of Appeal, First District, Division 3, California, decided November 30, 2015.*

e) Cumulative Impacts

Section III, Environmental Setting, of this Draft EIR lists 172 Related Projects that the City has identified as potential development within the Project Site vicinity. For the purposes of this cumulative impacts analysis, the geographic scope of this cumulative analysis encompasses only the 172 Related Projects that are located within the Central Community Police Station Service Area.

(1) Impact Analysis

(a) Construction

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

(b) Operation

With regard to operation, **Table IV.J.2-3, Cumulative Population for Police Services – Central Community Police Station**, shows the estimated residential populations associated with the cumulative development within the Central Community Police Station service area. As shown on **Table IV.J.2-3**, the Project's increase of 328 residents plus the Related Projects' 103,479 residents would cumulatively generate an increase of approximately 103,807 residents within LAPD's Central Community Police Station service area. However, as stated above, the City does not have an adopted officer-to-resident ratio as a level of service performance standard.

**Table IV.J.2-3
Cumulative Population for Police Services – Central Community
Police Station**

Land Use	Population
Related Projects	103,479
Project	328
Cumulative Development	103,807
<i>Based on Table III-1, List of Related Projects, in Section III, Environmental Setting, of this Draft EIR.</i>	
<i>Source (table): EcoTierra Consulting, 2022.</i>	

Conservatively assuming that all 172 Related Projects within the jurisdiction of the Central Community Police Station would be built as currently proposed, when the additional 103,807 residents are combined with the existing population, the future officer-to-resident ratio would be 1:389 in contrast to the current ratio of 1:108. Although the new residents resulting from the Project and the 172 Related Projects that would be located within the Central Community Police Station service area would reduce the officer-to-resident ratio by more than half, it would still be above the citywide average of 1:401. In addition, the proposed uses of the related projects are largely residential, office, and commercial/retail, with other miscellaneous uses, which are uses that would not create a substantial unique new demand on police services. Furthermore, similar to the Project, the Related Projects would be required to demonstrate general conformance with applicable General Plan goals, objectives, and policies pertaining to police services as part of environmental review. As part of this process, the Related Projects would be required to consult and coordinate with LAPD to implement sufficient security measures to reduce potential impacts during operation to police protection services. Similarly, many of the Related Projects would also be expected to provide on-site security, personnel and/or other design features that would reduce demand for police protection services.

Furthermore, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(d) above, the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. In accordance with police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the regulatory framework above, the LAPD would also continue to monitor population-growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. 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 Fund. The Project, as well as the Related Projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

If the expansion of the Central Community Police Station (approximately three acres in size currently) was determined warranted by LAPD, and was foreseeable, the Station site is already

developed, and the off-site expansion of the Station on an infill lot would be anticipated to include development at a scale that is unlikely to result in significant impacts. However, 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 expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 2 acres in size, and (3) would likely qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332, Negative Declaration or Mitigated Negative Declaration and would not be expected to result in significant impacts. Accordingly, the potential need for additional police protection services is not an environmental impact that the Project would be required to mitigate.

Since the impact of the Project on its own would be less than significant and since all Related Projects would be required to consult and coordinate with LAPD to implement sufficient security measures to reduce potential impacts to police protection services, the Project would not contribute to a cumulatively significant impact on police protection services. **Based on the above analysis, the Project's contribution to cumulative impacts related to police services would not be cumulatively considerable, and cumulative impacts on police services would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding police protection services would be less than significant. 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.