

IV. Environmental Impact Analysis

H.2 Public Services – Police Protection

1. Introduction

This section of the Draft EIR analyzes whether the Project's new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) and includes statistical data regarding police protection facilities and services and response times. This is included in Appendix I-2, of this Draft EIR. Additional information included in this analysis is also based on LAPD crime control model computer statistics (COMPSTAT) database and other data available 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 Charter
- City of Los Angeles General Plan Framework Element
- Wilshire Community Plan
- City of Los Angeles Administrative and Municipal Codes
- Los Angeles Police Department Computer Statistics Unit Program
- Los Angeles Police Department 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 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 pedestrian 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 services, 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 Trustee 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

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.

police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²

(c) *California Penal Code*

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

(2) Regional

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

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 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 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.

(b) *City of Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), originally adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure

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

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 January 27, 2020.

and public services. Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.H.2-1, *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies***, below. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

**TABLE IV.H.2-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT INFRASTRUCTURE AND PUBLIC
SERVICES GOALS, OBJECTIVES, AND POLICIES**

Goal/Objective/Policy	Description
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.

SOURCE: City of Los Angeles, 2001.

(c) *Wilshire Community Plan*

The Land Use Element of the City of Los Angeles General Plan is comprised of 35 community plans. 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 community plans implement the Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans express the goals, objectives, policies, and programs community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project is located within the Wilshire Community Plan Area. The Wilshire Community Plan was completed in 1976, revised in 1988, and adopted on September 19, 2001. The Wilshire Community Plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west. The Wilshire Community Plan sets forth planning goals and objectives to maintain the community's distinctive character. The LAPD provides police protection within the Wilshire Community Plan Area. LAPD facilities serving the Wilshire Community Plan Area include the Wilshire Community Police Station, and four additional Police Department stop-in sites. The Wilshire Community Plan provides one goal, four policies, and two objectives regarding police protection, as shown in **Table IV.H.2-2, *Relevant Wilshire Community Plan Goals, Objectives, and Policies***

**TABLE IV.H.2-2
RELEVANT WILSHIRE COMMUNITY PLAN GOALS, OBJECTIVES, AND POLICIES**

Goal/Objective/Policy	Description
Goal 8	Continue to provide the Wilshire Community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidence of crime, and provide other necessary law enforcement services.
Objective 8-1	Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
Policy 8-1.1	Consult with the LAPD in the review of development projects and land use changes to determine law enforcement needs.
Objective 8-2	Improve the ability of the community and police department to minimize crime and provide adequate security for all residents.
Policy 8-2.1	Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with existing policing, foot and bicycle patrols, community watch programs and regular communication with neighborhood and civic organizations.
Policy 8-2.2	Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.
Policy 8-2.3	Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.

SOURCE: City of Los Angeles, 2001.

(d) City of Los Angeles 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. 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 regards to new development.

(e) 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

(f) *Los Angeles Police Department Guidelines and Plan Review*

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD's Design Out Crime Guidelines, which incorporates techniques of Crime Prevention Through Environmental Design (CPTED) and seeks to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to provide on-site security personnel whose duties shall include, but not be limited to, the following:

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

b) Existing Conditions

(1) LAPD Service 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. Each bureau is further defined by divisions and into

⁴ Los Angeles Planning Department (LAPD), COMPSTAT, http://www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed January 29, 2021.

reporting districts. 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).⁵

As of August 23, 2020, the departmental staffing resources within the LAPD include 9,878 sworn officers.⁶ Based on a total City population of 4,029,741, the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.⁷

The Project Site is located within the jurisdiction of the West Bureau, Wilshire Division, of the LAPD. The West Bureau covers approximately 124 square miles with a population of approximately 840,400 residents, and overseas operations in the communities of Hollywood, Wilshire, Pacific, and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.⁸ The West Traffic Division is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau. The West Bureau oversees operations at five community police stations: the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station.⁹ The Wilshire Community Police Station, which is the nearest to the Project Site, serves the Project Site and is described in more detail below.

(2) LAPD Wilshire Community Police Station

The Project Site is served by the Wilshire Community Police Station, located at 4861 West Venice Boulevard, approximately 2.5 miles southeast of the Project Site, as shown in **Figure IV.H.2-1, Location of Wilshire Community Police Station**. The Wilshire Community Police Station's boundaries encompass 13.97 square miles (Wilshire Community Area), consists of 57 Reporting Districts (RD), and includes the communities of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Park, Larchmont Village, Little Ethiopia, Melrose, Mid-City, Mid-Wilshire, Miracle Mile, Park La Brea, South Carthay, Wellington Square, Wilshire Center, Wilshire Vista, and Windsor Square.¹⁰ The Project Site is located within RD 722.

⁵ LAPD, Inside the LAPD, http://www.lapdonline.org/inside_the_lapd, accessed January 27, 2020.

⁶ LAPD, COMPSTAT Citywide Profile 08/23/20–09/19/20.

⁷ LAPD, COMPSTAT Citywide Profile 08/23/20–09/19/20.

⁸ LAPD, About West Bureau, http://www.lapdonline.org/west_bureau/content_basic_view/1869, accessed January 27, 2020.

⁹ LAPD, West Bureau Community Police Stations, http://www.lapdonline.org/west_bureau/content_basic_view/1871, accessed January 27, 2020.

¹⁰ LAPD, Wilshire Community Police Station, http://www.lapdonline.org/wilshire_community_police_station, accessed January 27, 2020.

The Wilshire Community Police Station has approximately 267 sworn personnel and 13 civilian support staff that serve a population of approximately 249,200 persons. The officer to resident ratio is one officer to every 933 residents (1:933).¹¹ Additionally, there are special service teams available within the LAPD to service the Wilshire Community Area.

In the event a situation arises requiring increased staffing, additional officers can be called in from other LAPD area police stations (the other closest stations within the West Bureau being the Olympic Community Police Station, the Hollywood Community Police Station, the Pacific Community Police Station, and the West Los Angeles Community Police Station).¹² As with all municipal police departments in Los Angeles County, the LAPD also participates in the Mutual Aid Operations Plan for Los Angeles County (refer to further discussion provided under **Subsection IV.H.2.2.a, Regulatory Framework**, above). The Mutual Aid Operations Plan is a reciprocal agreement between signatory agencies (in this case, the Los Angeles County Sheriff's Department, which provides police services under contract to the City of West Hollywood, or other local police departments) to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril.

The emergency response system of the Wilshire Community Police Station is directly linked to the LAPD Communication Dispatch Center. The Communication Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which 911 emergency calls for service are received (includes police, fire, and paramedic). According to the LAPD, the average response time to emergency (high priority or Code 3) calls for service in the Wilshire Community Area is 4.2 minutes. The average response time to medium high priority (Code 2) calls for service was 13.6 minutes and the average response time for low priority, non-emergency calls for service in the Wilshire Community Area is 33.6 minutes.

These response times were taken from the statistics submitted by the Wilshire Division for the four-week period between January 12, 2020 through February 8, 2020.¹³

¹¹ Michael R. Moore, Chief of Police; Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division; Officer James Nichols, Community Outreach and Development Division, Crime Prevention Through Environmental Design Section (CPTED); LAPD Correspondence, dated February 20, 2020. Provided in Appendix I-2 of this Draft EIR.

¹² LAPD, Operations – West Bureau. Prepared by LAPD/PRD/GIS MAPPING January, 2009.

¹³ Michael R. Moore, Chief of Police; Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division; Officer James Nichols, Community Outreach and Development Division, Crime Prevention Through Environmental Design Section (CPTED); LAPD Correspondence, dated February 20, 2020. Provided in Appendix I-2 of this Draft EIR.

(3) LAPD Crime Statistics

Currently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT, short for “computer statistics,” is a multi-faceted system for managing police operations. COMPSTAT looks outwardly at crime and its effects in the community, while at the same time looking within the organization to identify best practices in managing police personnel and risk management issues.¹⁴ COMPSTAT Plus is based on the COMPSTAT program that was created in 1994 by then Police Commissioner of the New York Police Department and former LAPD Chief William J. Bratton.

The COMPSTAT Division of the LAPD implements the 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. COMPSTAT has been shown to reduce crime occurrences in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.¹⁵ With its specialized crime control model, the COMPSTAT system implements a multi-layer approach to police protection services through statistical and geographical information system analysis of trends in crime.

Table IV.H.2-3, *Population, Officer, and Crime Comparison (2019)*, lists the resident population, number of sworn officers, officer/resident ratio, number of crimes, and crimes per 1,000 residents for the Wilshire Community Area and Citywide for year 2019, the latest data available. As reported therein, the officer to resident population ratios within the Wilshire Community Area and Citywide are 1:933 and 1:400, respectively, and the number of crimes per 1,000 residents within the Wilshire Community Area and Citywide is 26 and 27, respectively.¹⁶

¹⁴ LAPD, COMPSTAT Webpage, http://www.lapdonline.org/harbor_news/content_basic_view/6363, accessed April 22, 2020.

¹⁵ LAPD, COMPSTAT Plus, http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 27, 2020.

¹⁶ Michel R. Moore, Chief of Police; Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division; Officer James Nichols, Community Outreach and Development Division, CPTED; LAPD Correspondence, dated February 20, 2020. Provided in Appendix I-2 of this Draft EIR.

**TABLE IV.H.2-3
POPULATION, OFFICER, AND CRIME COMPARISON (2019)**

Service Area	Square Miles	Resident Population	Sworn Officers	Officers/ Resident Ratio	Annual Reported Crimes	Crimes per 1,000 Residents
Wilshire Community Area	13.97 ^a	249,200 ^b	267 ^b	1/933 ^b	6,367 ^c	26 ^d
Citywide	472.9 ^e	4,029,741 ^e	10,073 ^e	1/400 ^f	108,893 ^b	27 ^g

^a LAPD, About Wilshire, http://www.lapdonline.org/wilshire_community_police_station/content_basic_view/1723, accessed January 27, 2020.

^b LAPD Correspondence, dated February 20, 2020. Provided in Appendix I-2 of this Draft EIR.

^c Crime data is provided for 2019 (the latest whole year for which annual crime data was available).

^d 6,367 crimes/ 249,200 residents = 0.026 x 1,000 = 26 crimes per 1,000 residents.

^e LAPD, COMPSTAT Citywide Profile 12/22/19–01/18/20. This number differs compared to the previously listed 9,878 sworn officers as of August 23, 2020, as based on the latest COMPSTAT data.

^f 4,029,741 residents/10,073 officers = 400 residents/1 officer.

^g 108,893 crimes/4,029,741 residents = 0.027 X 1,000 = 27 crimes per 1,000 residents.

SOURCE: ESA, 2020.

As reported by the LAPD, as a whole, Citywide crime has declined for the second consecutive year in 2019.¹⁷ According to LAPD Chief Michel Moore, this decrease was attributed to a number of factors, including the LAPD's emphasis on community policing and partnering with organizations such as the Gang Reduction and Youth Development Foundation to work at the neighborhood level and working with city officials and civilian groups on several initiatives, for example, to place more homeless people in shelters and create more storage units for their belongings. In 2019, the LAPD increased its efforts to use more non-lethal tools to fight crime and had a 70 percent homicide clearance rate, as well as a 7.8 percent decrease in property crime. Burglaries and motor vehicle theft dropped 16.7 percent and 11.1 percent respectively.¹⁸

In 2015, overall crime increased in all categories, with violent crime increasing Citywide by 20 percent and property crime increasing by 10 percent.¹⁹ According to the LAPD, many factors contribute to the increases, including increased

¹⁷ Los Angeles Times, California, Crime in L.A. dropped again in 2019. Police credit community outreach and gang intervention, December 31, 2019, <https://www.latimes.com/california/story/2019-12-31/crime-in-los-angeles-drops-2019-police-community-partnerships-and-gang-intervention>, accessed February 4, 2020.

¹⁸ Los Angeles Times, California, Crime in L.A. dropped again in 2019. Police credit community outreach and gang intervention, December 31, 2019, <https://www.latimes.com/california/story/2019-12-31/crime-in-los-angeles-drops-2019-police-community-partnerships-and-gang-intervention>, accessed February 4, 2020

¹⁹ LAPD, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016 http://www.lapdonline.org/home/news_view/60015, accessed January 7, 2019.

homelessness and drug use; the recent approval of California Proposition 47 and AB 109, which reduced penalties for certain offenses such as drug possession and minor thefts to misdemeanors; stricter reporting of aggravated assaults under the federal Uniform Crime Report system; and increased outreach to victims of domestic violence, which is traditionally an underreported crime.²⁰ However, in 2018, overall crime throughout the City was down in all categories except for personal theft.²¹ For example, violent crime was down about four percent compared to 2017, and property crime decreased by two percent.

To help minimize crime throughout the City, numerous efforts have been implemented over recent years. According to the LAPD, these include, but are not necessarily limited to, training and deploying specially-trained officers assigned to LAPD's Metropolitan Division, who are flexibly deployed to rapidly respond to crime spikes and proactively prevent crimes throughout the City; increasing the number of Domestic Abuse Response Teams; expanding the Gang Reduction and Youth Development (GRYD) program to include twice as many GRYD zones that provide prevention and intervention services to at-risk youth; combining City and County efforts to reduce homelessness by increasing available housing and providing additional support services; and doubling the number of specially-trained teams of police officers and mental health professionals to respond to incidents involving a mental health crisis.²²

Table IV.H.2-4, *LAPD Wilshire Community Area Crime Statistics (2019)*, summarizes the crime statistics for the Wilshire Community Area from 2019 (the latest whole year for which annual crime data is available). As indicated therein, crimes in the Wilshire Community Area totaled 6,367, with most of the crimes related to personal and other theft.

²⁰ LAPD, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016 http://www.lapdonline.org/home/news_view/60015, accessed January 7, 2019.

²¹ Los Angeles Times, Crime is down in Los Angeles for the first time in five years, December 29, 2018, <https://www.latimes.com/local/lanow/la-me-lapd-crime-stats-20181229-story.html>, accessed February 14, 2020.

²² LAPD, LAPD Statement on Crime Fighting Strategies, January 20, 2016, http://www.lapdonline.org/home/news_view/60015, accessed January 7, 2019.

**TABLE IV.H.2-4
LAPD WILSHIRE COMMUNITY AREA CRIME STATISTICS (2019)**

Crime	Wilshire Community Area	
	Number	Percent of Wilshire Community Area Crime ^a
Homicide	2	0%
Rape	57	1%
Robbery	417	7%
Aggravated Assault	521	8%
Burglary	845	13%
Motor Vehicle Theft	496	8%
Burglary From Motor Vehicle	1,990	31%
Personal/Other Theft	2,039	32%
Total	6,367	100%

^a Percentages are rounded.

SOURCE: LAPD Correspondence, dated February 20, 2020. Provided in Appendix I-2 of this Draft EIR.

(4) Existing Project Site Features

The Project Site is currently developed with a 5,738-square-foot vacant educational building, an 8,225-square-foot Big 5 Sporting Goods store, and associated surface parking.²³ Surface parking is located on the eastern portion of the Project Site and at the center of the Project Site between the two buildings, and to the rear of the Big 5 Sporting Goods store. No existing housing or other commercial uses are located on the Project Site.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to police protection services if it would:

²³ The 5,738-square-foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

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.

The need for or deficiency in adequate police protection in and of itself is not a CEQA impact, but rather a social and/or economic impact.²⁴ Where a project causes a need for additional police protection 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. 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 one acre in size, and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

b) Methodology

The analysis of impacts on police protection addresses the Project’s effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, 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

²⁴ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

for the Wilshire Community 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.

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 net 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.

The Big 5 Sporting Goods store is used on a daily basis as retail-commercial use. While temporary visitors are generated by the Big 5 Sporting Goods store, the existing visitors would already be accommodated by existing police service to the Project Site. The existing visitors and employees associated with the Big 5 Sporting Goods store would not create a new demand on police services. Therefore, it is assumed that all new police service population that would require LAPD protection services would represent a net increase over current conditions. 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 their responses were incorporated regarding the Project.

c) Project Design Features

(1) Construction

Refer to Project Design Features TRAF-PDF-2 (Construction Traffic Management Plan) and TRAF-PDF-3 (Construction Worker Parking Plan) in **Section IV.I, 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.** During construction, the Project Site shall be fenced and gated with surveillance cameras to monitor the site during off hours. Security lighting shall also 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.** During operation of the Project, access to the parking structure shall be controlled through gated entries, and the entry areas shall be well illuminated. Project Site security shall include controlled keycard access to medical office spaces, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).

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*

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 become a distraction for local law enforcement from more pressing matters that require their attention. This could 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 less of a need for local law enforcement at the construction site.

The Project Site is easily accessed from the adjacent roadways. The Project Site would need to be secured during construction in order to avoid potential theft. Fencing and other security features, such as perimeter fencing, lighting, and security guards (as necessary), would be provided at the Project Site during construction, thereby reducing the potential need for LAPD services (refer to Project Design Feature POL-PDF-1). 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. This is especially

important since the Project Site is located at the intersection of multiple streets that have an active walking and/or driving environment. 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 building construction phase.

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. 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 for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD;
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. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

A Construction Traffic Management Plan, subject to review and approval by the City of Los Angeles Department of Transportation (LADOT), would be incorporated into the Project as provided in Project Design Feature TRAF-PDF-2. The Construction Traffic Management Plan would include 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. Also, a separate Construction Worker Parking Plan would be prepared pursuant to Project Design Feature TRAF-PDF-3. The Construction Worker Parking Plan would specify specific locations construction workers are allowed to park, so as to not interfere with emergency vehicle access.

Any potential LAPD officers needed to patrol the Project Site would be from the existing officers at the Wilshire Community Police Station. It is not anticipated that any additional officers from LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. 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.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically-altered government 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. Therefore, impacts to police protection during Project construction would be less than significant.

(b) Operation

The Project would demolish a total of 13,963 square feet of existing uses, comprised of the 5,738 square-foot vacant educational building and the 8,225-square-foot Big 5 Sporting Goods store commercial building, and associated surface parking lots that currently occupy the Project Site.²⁵ The Project would develop up to approximately 145,305 square feet of floor area, comprised of 140,305 square feet of medical office space and 5,000 square feet of ground floor retail-commercial space, of which up to 4,000 square feet may be a restaurant and 1,000 square feet may be other commercial uses, such as a pharmacy, and 418 parking spaces. As there are no proposed residential uses, the Project would only contribute to increasing the number of non-resident site populations (visitors and employees).

As shown below in **Table IV.H.2-5, Project Increases in Police Service Non-Residential Population**, the Project would introduce new visitor populations and would increase the existing number of employees at the Project Site, which would increase the demand for police protection from the LAPD. As discussed in **Subsection IV.H.2.2, Environmental Setting**, the Project Site is served by the Wilshire Community Police Station, which has approximately 267 sworn personnel. This station currently serves a population of approximately 249,200 people and reported 6,367 total crimes in 2019. This represents an officer-to-population ratio of approximately 1:933 and an annual crime rate of 0.026 crimes per capita. The Project does not propose any residential uses and would therefore not directly generate any new residential population in the Wilshire Community Area. With the addition of the Project, the Wilshire Community Area would continue to serve a population of 249,200 residents with 267 officers; thus, maintaining the officer to resident population ratio of 1:933.

²⁵ The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

**TABLE IV.H.2-5
PROJECT INCREASES IN POLICE SERVICE NON-RESIDENTIAL POPULATION**

Land Use	Amount of Development	Generation Factor (population per unit) ^a	Police Service Population
<i>Non-Residential Uses</i>			
Medical Offices	140,305 sf	4 persons/1,000 sf	561
Retail/Commercial	5,000 sf	3 persons/1,000 sf	15
<i>Subtotal Non-Residential Population Generated</i>			<i>577</i>
<i>Existing Uses</i>			
Retail/Commercial	8,225 sf	3 persons/1,000 sf	25
Educational	5,738 sf	3 persons/1,000 sf	17
<i>Subtotal Non-Residential Population Generated</i>			<i>42</i>
Net Total Police Service Population			535

sf = square feet

^a The generation factors for non-residential uses are based on the Police Service Population Conversion Factors from the 2006 L.A. CEQA Thresholds Guide. As stated in **Subsection IV.H.2.3.b, Methodology**, above, the Project-generated police service population was calculated based on the 2006 L.A. CEQA Thresholds Guide, which includes the number of residents and visitors per unit or 1,000 square feet that would be present at any one time during Project operation.

SOURCE: ESA, 2020.

As shown in Table IV.H.2-5, the estimated net non-resident service population associated with the 140,305 square feet of medical office space and 5,000 square feet of ground floor retail-commercial space would be 535 people. However, LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is incorporated into the overall community service ratio based on the residential population. The City does not separately consider non-residential population increases when calculating increased demand for police services. Moreover, the Project's operational demand for police protection services would be offset as the result of the security services, which would help patrol the Project Site and surrounding area; and the proposed security features set forth in Project Design Feature POL-PDF-2. As provided in Project Design Feature POL-PDF-2, the Project would control access to the parking structure and entry areas into the building would be well illuminated. Project Site security would also include controlled keycard access to medical office spaces, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV). Implementation of these security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services.

According to the LAPD, there are no current plans to expand the Wilshire Community Police Station or increase the number of personnel assigned to the Wilshire Community Area.²⁶ Nonetheless, operational impacts on police protection services would be less than significant.

As previously discussed, the average emergency response time within the Wilshire Community Area is 4.2 minutes for emergency calls, 13.6 minutes for medium high priority (Code 2) calls and 33.6 minutes for low priority, non-emergency calls for service. Given this, along with reduced demand for police services as the result of on-site security personnel and design features, and given the close proximity of the Project Site to the Wilshire Community Police Station (3.01 miles), emergency response times are not expected to significantly increase under the Project and are expected to remain below the citywide average. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area. Accordingly, Project operational impacts associated with emergency response times and emergency access would be less than significant.

Based on the above analysis and with implementation of Project Design Feature POL-PDF-2, development of the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. **Therefore, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered 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. Therefore, impacts to police protection during Project operation would be less than significant.**

(2) Mitigation Measures

Impacts regarding police protection services would be less than significant. Therefore, no mitigation measures are required.

²⁶ Michael R. Moore, Chief of Police; Aaron C. Ponce, Commanding Officer, Community Outreach and Development Division; Officer James Nichols, Community Outreach and Development Division, CPTED; LAPD Correspondence, dated February 20, 2020. Provided in Appendix I-2 of this Draft EIR.

(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 four related projects (two in the City of Los Angeles, one in the City of Beverly Hills, and the Metro Purple Line Extension which is in both the City of Los Angeles and the City of Beverly Hills) that are anticipated to be developed within a 0.25-mile radius of the Project Site. For purposes of this analysis of cumulative impacts on police protection services, only those projects located within the Wilshire Community Area are considered as related projects. Projects located in other service areas would be served by their respective police stations. Of the four related projects, three are located within the Wilshire Community Area. The remaining related project is located within the City of Beverly Hills and is, therefore, not considered in this cumulative analysis as the Project would not contribute to the use of police protection services provided outside of the City. The related projects in the Wilshire Community Area include residential, retail, and infrastructure uses.

(a) Construction

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 implement a construction traffic management plan 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 installing construction fencing and gating 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.

(b) Operation

As discussed above, the related projects in the Wilshire Community Area include residential, retail, and infrastructure uses. **Table IV.H.2-6, Cumulative Population for Police Services**, shows the estimated cumulative residential and non-residential populations for the related projects in the Wilshire Community Area. As indicated in Table IV.H.2-6, the Project would represent the highest or most conservative net new non-residential population on the Project Site. Thus, the Project (535 non-residents) in addition to the related projects (429 residents and 35 non-residents) would increase the service population of LAPD’s Wilshire Community Area by an estimated 429 residents and 570 non-residents. The net new residential population generated by the related projects plus the project could generate an additional 11 crimes per year in the Wilshire Community Area, assuming the same crime per capita rate as existing conditions.²⁷ The net new residential plus non-residential population of the Project plus related projects could generate an additional 26 crimes per year in the Wilshire Community Area.²⁸

**TABLE IV.H.2-6
CUMULATIVE POPULATION FOR POLICE SERVICES**

Land Use	Amount of Development	Generation Factor (population per unit) ^a	Residential Population	Non-Residential Population
Related Projects^b				
Residential	143 du	3 persons/unit	429	
Retail	11,685 sf	3 persons/1,000 sf		35
Total Related Projects			429	35
<i>Project Generation</i>			<i>0</i>	<i>535</i>
Related Projects + Project			429	570

du = dwelling units; sf = square feet

^a The generation factors are based on the Police Service Population Conversion Factors from the 2006 L.A. CEQA Thresholds Guide. As stated in **Subsection IV.H.2.3.b, Methodology**, above, the police service population was calculated based on the 2006 L.A. CEQA Thresholds Guide, which includes the number of residents and visitors per unit or thousand square feet that would be present at any one time during Project operation.

^b Related Project No. 4 (Metro Purple Line Extension) was not included in this cumulative analysis table as it is an infrastructure project and no LAPD generation rates are provided for this type of use.

SOURCE: ESA, 2020.

²⁷ 429 new residents X 26 crimes/1,000 residents = 11 additional crimes per year.

²⁸ 999 new residents X 26 crimes/1,000 residents = 26 additional crimes per year.

The new residents generated by the related projects would result in an officer-to-resident ratio of 1:935 and would require an additional 0.45 officers to maintain the existing ratio of 1:933.²⁹ If the non-residential population were assumed to be residents, the officer-to-resident ratio would result in an officer-to-resident ratio of 1:937 and would require an additional 1.07 officers to maintain the existing ratio of 1:933.³⁰ Therefore, the Project together with related projects would cumulatively generate increased demand for police protection services from the Wilshire Community Police 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 do not proceed beyond the application phase or ultimately are not built. 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 Wilshire Community 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, related projects are anticipated to include adequate security features similar to the Project's, including mitigation measures, if appropriate, that would serve to reduce cumulative impacts to police protection service. 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, in accordance with Section 21806 of the CVC. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Additionally, the Project and the related projects would contribute revenue to the City's General Fund which could fund LAPD expenditures as necessary to offset the 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

²⁹ 249,200 existing residents + 429 new residents = 249,629 residents/267 existing officers = one officer per 935 residents. 429 new residents X (one officer per 933 residents) = 0.45 additional officers.

³⁰ 249,200 existing residents + 999 new residents = 250,199 residents/267 existing officers = one officer per 937 residents. 999 new residents X (one officer per 933 residents) = 1.07 additional officers.

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 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), provided in **Subsection IV.H.2.a)(1)(b), California Constitution Article XIII, Section 35**, 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 due to 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 one 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. As such, cumulative impacts on police protection services would be less than significant.

(c) *Conclusion*

Based on the above, the Project's contribution to impacts associated with the provision of new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts 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.

This page intentionally left blank