

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) dated December 12, 2021, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix J.2 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding police protection at the State, regional, and local levels. Described below, these include:

- California Vehicle Code Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management (OEM)
- City of Los Angeles General Plan
 - Framework Element
 - Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- LAPD Computer Statistics Unit (COMPSTAT) 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 incidents/calls.¹ This section of the California Vehicle Code states the following:

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

(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

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.

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

(c) California Penal Code

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

(2) Regional

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

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 October 1, 2021.

Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.J.2-1 on page IV.J.2-5. Chapter 9 of the Framework addresses Infrastructure and Public Services, and includes the following relevant goals, objectives, and policies outlined below in Table IV.J.2-1. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

(ii) Palms–Mar Vista–Del Rey Community Plan

The Land Use Element of the City’s General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City’s Framework Element 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. The Project site is located within the Palms–Mar Vista–Del Rey Community Plan area.

The Palms–Mar Vista–Del Rey Community Plan (Community Plan), adopted on November 20, 1985 and updated in 1997, includes the following objectives and policies that are relevant to police protection:

- Objective 8-1: Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
- Policy 8-1.1: Review with the Police Department proposals for new development projects and land use changes to determine law enforcement needs and requirements.
- Objective 8-2: Increase the community’s and the Police Department’s ability to minimize crime and provide security for all residents.

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

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.	

- Policy 8-2.1: Support and encourage community based crime prevention efforts through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, and regular communication with neighborhood and civic organizations.
- Policy 8-2.2: Ensure adequate lighting around residential, especially multi-family commercial and industrial buildings to improve security.
- Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.

(b) City of Los Angeles Charter

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

(c) Administrative and Municipal Codes

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

(d) Los Angeles Police Department Computer Statistics Unit Program

The LAPD COMPSTAT Program was created in 1994 and implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. 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.³

(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 incorporate techniques of Crime Prevention Through Environmental Design (CPTED) and seek to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to:

- Provide on-site security personnel whose duties shall include, but not be limited to, the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems;
 - Controlling and monitoring activities in parking facilities;

³ LAPD, COMPSTAT, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/, accessed January 11, 2022.

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

b. Existing Conditions

(1) LAPD Service Area and Bureaus

The LAPD service area covers approximately 468 square miles and is divided into four geographic bureaus: the Central Bureau, the West Bureau, the South Bureau, and the Valley Bureau.⁴ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD’s 21 community police stations. Each geographic bureau is comprised of four to seven geographic areas/police stations.⁵

As of December 2021, the departmental staffing resources within the LAPD included 9,422 sworn officers and 3,328 civilian employees. Based on a total City population of 3,966,936 the LAPD currently has an officer-to-resident ratio of one officer for every 421 residents.⁶

⁴ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed January 11, 2022.

⁵ LAPD, *LAPD Organization Chart*, https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/12/Org_chart_DP12_11232021.pdf, accessed January 11, 2022.

⁶ *Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.*

The Project site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.⁷ The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles service areas.⁸ The West Bureau also oversees the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile, as well as West Bureau Homicide Division.⁹

(2) LAPD Community Police Station

Within the West Bureau, the Project site is located within the Pacific Division's service area, which is served by the Pacific Community Police Station. As shown in Figure IV.J.2-1 on page IV.J.2-9, the Pacific Community Police Station is located at 12312 Culver Boulevard, approximately 0.7 mile northwest of the Project site. The Pacific Community Police Station service area covers approximately 25.7 square miles and is generally bounded by the Santa Monica Freeway to the north, the San Diego Freeway and National Boulevard to the east, West Imperial Highway to the south, and the Pacific Ocean to the west.¹⁰

The Pacific Community Police Station serves a population of approximately 203,379 persons and is staffed by approximately 302 sworn officers and 14 civilian support staff.¹¹ The average response time for emergency and non-emergency calls of the Pacific Community Police Station in 2021 was 6.0 and 42.3 minutes, respectively.¹² Based on the police service population of 203,379 residents, the officer-to-resident ratio of the Pacific Community Police Station is one officer for every 673 residents. Note that the LAPD evaluates service capacity using resident population only and does not consider employees or other visitors.¹³

⁷ LAPD, West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed November 11, 2021.

⁸ LAPD, West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed November 11, 2021.

⁹ LAPD, West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed November 11, 2021.

¹⁰ Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.

¹¹ Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.

¹² Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.

¹³ Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.



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

3. Project Impacts

a. Thresholds of Significance

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

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

This analysis relies upon the Appendix G Threshold listed above. 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 question. The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to police protection services:

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

b. Methodology

According to the City's L.A. CEQA Thresholds Guide, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, new or physically altered government facilities. As such, the determination of significance relative to impacts on police protection services is based on the evaluation of existing police protection services for the police station serving the Project site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical averages associated with the police station serving the Project site and citywide services and, based on guidance from the LAPD, focuses on the increase in the residential population from the

Project. The determination of impact on the capability of existing police protection services and personnel is based in part on the potential for the annual crimes per resident in the Pacific service area to exceed current averages due to the addition of the Project. Project design features that would reduce the impact of the Project on police protection services are also described.

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. Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to police protection services is determined by whether construction of new or expanded police facilities is reasonably foreseeable to be a direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event 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 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration.

c. Project Design Features

The following project design features are proposed to increase Project site security and minimize the Project's demand for police protection services:

Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures, including security fencing, lighting, locked entry, and regular security patrols during non-construction hours.

Project Design Feature POL-PDF-2: The Project will include security measures for entry into the building and parking area, including a keycard system.

Project Design Feature POL-PDF-3: The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.

Project Design Feature POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project will design entrances to and exits from the building, open spaces around the building, and pedestrian walkways to be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: The Applicant will consult with LAPD regarding the incorporation of additional feasible crime prevention features into the building design and operation. Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

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 (i.e., police), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

(1) Impact Analysis

(a) Construction

As population generated at the Project site during construction would be temporary in nature, construction of the Project would not generate a permanent population on the Project site that could substantially increase the police service population of the Pacific Community Police Station service area. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, during construction, the Applicant would implement temporary security measures, including security fencing, lighting, locked entry to secure the Project site, and regular security patrols during non-construction hours. With implementation of these security measures, the potential demand on police protection services at the Project site associated with theft and vandalism during construction would be reduced.

Construction activities could also potentially affect LAPD response times due to reduced capacities of adjacent streets. As discussed in Section IV.K, Transportation, of

this Draft EIR, while most construction activities are expected to be primarily contained within the boundaries of the Project site, parking lane and/or temporary sidewalk closures are anticipated. However, as discussed in Section IV.K, Transportation, of this Draft EIR, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access is available within and in the surrounding vicinity of the Project site during construction activities. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to California Vehicle Code Section 21806, drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Accordingly, construction-related traffic generated by the Project would not significantly impact LAPD response times to the Project site.

Based on the above, construction activities associated with the Project would not generate a demand for additional police protection services that would necessitate the provision of new or physically altered government facilities. Accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

As previously discussed, the LAPD only considers the residential population within their service area to evaluate service capacity (e.g., police officers to resident service ratio). The Project includes the construction of a new eight-story office building with a total floor area of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. As such, the Project would not introduce a new residential population to the Project site that could generate a direct demand for police protection services. Therefore, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the Pacific Community Police Station service area or affect the existing officer-to-resident ratio in the service area of the Pacific Community Police Station.¹⁴ Therefore, the Project would not affect service capacity.

The Project would introduce a new employee and visitor population to the Project site. The Project site is currently occupied with a 23,072-square-foot office building and two accessory buildings of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street, and an 87,881-square-foot office building at 12541 W. Beatrice Street. As part of

¹⁴ When calculating service ratios, LAPD considers only the residential service population of the service area.

the Project, the existing structures at 12575 W. Beatrice Street would be removed while the existing office building at 12541 W. Beatrice Street would be retained, resulting in a net increase of 169,240 square feet of floor area. In addition, as discussed in the Initial Study included as Appendix A of this Draft EIR, development of the Project would result in approximately 670 new employees.¹⁵

Overall, LAPD has concluded that a project of this size could have a minor impact on police protection services in the Pacific Division service area.¹⁶ As provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous design and operational features to enhance safety within and immediately surrounding the Project site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project will include a keycard entry to the parking areas and the building to ensure the safety of its tenants and site visitors. In addition, the Project will provide lighting of the proposed building and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into the building, as set forth by Project Design Feature POL-PDF-3, as well as provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment, as set forth by Project Design Feature POL-PDF-4. Furthermore, Project Design Feature POL-PDF-5 will require the Project to design entrances to and exits from the building, spaces around the building, and pedestrian walkways to be open and in view of surrounding sites. Lastly, as specified in Project Design Features POL-PDF-6, the Applicant will consult with LAPD regarding the incorporation of additional feasible crime prevention design and operational features and submit a diagram of the Project site to the LAPD showing access routes and other information that might facilitate police response. In addition to the implementation of these site security features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The project design features, as well as the Project's contribution to the General Fund, which constitutes about 12 percent of the LAPD annual budget, would help offset the Project-related increase in demand for police protection services.

The Project would introduce new uses, which would generate additional traffic in the vicinity of the Project site. As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency access to the Project site, would be provided via

¹⁵ *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The existing office uses to be removed produces 121 employees (30,260 square feet X 0.004 = 121). The Project would produce 791 employees (office 196,100 square feet X 0.004 = 784) + (retail 3,400 square feet X 0.002 = 7). Therefore, the Project would produce 670 new net employees.*

¹⁶ *Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.*

four vehicular access points. Specifically, vehicular access to the Project site would continue to be provided from Beatrice Street and Jandy Place. On Jandy Place, the Project would include one driveway to access the parking garage with one lane in each direction, in addition to a driveway dedicated to truck deliveries, which is located on the northwestern corner of the Project site. These two driveways would replace the one existing driveway along Jandy Place. On W. Beatrice Street, the Project would provide one driveway to access the parking garage with two lanes entering and one lane exiting the garage, in addition to the existing driveway on Beatrice Street that currently serves the building at 12541 W. Beatrice Street.

As discussed in detail in Section IV.K, Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Further, Project traffic or driveway design would not cause congestion that would impede access to the Project site (see Draft EIR, page IV.K-34). Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operation of the Project. As discussed in detail in Section IV.K. Transportation, of this Draft EIR, the Project would not cause or substantially extend vehicle queuing at the intersections analyzed and, therefore, would not cause any constraint on emergency access. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

LAPD has confirmed that the Project would not require any new facilities and that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain police protection service.¹⁷

Based on the above analysis, operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered

¹⁷ *Written correspondence from Officer James Nichols, CPD, Community Outreach and Development Division, Los Angeles Police Department December 12, 2021. See Appendix J.2 of this Draft EIR.*

police protection facilities, need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. As such, Project operational police protection impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to police protection 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

Cumulative growth in the greater Project area through 2025 (the Project's anticipated buildout year) includes one specific known development project, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, only one potential related project has been identified in the vicinity of the Project site for inclusion in the cumulative impact analysis for this EIR. This related project, known as Del Rey Pointe, is located less than 0.25 mile northwest of the Project site at 5000 S. Beethoven Street and includes the development of 236 multi-family residential apartment units. The projected growth reflected by this related project is a conservative assumption, as it may not be built out by 2025, may never be built, or may be approved and built at a reduced density. To provide a conservative forecast, the future baseline forecast assumes that this related project is fully built out by 2025. This related project falls within the boundaries of the Pacific Community Police Station service area, is served by the Pacific Community Police Station, and includes residential uses, as mentioned above.¹⁸

¹⁸ *When calculating service ratios, LAPD considers only the residential service population of the service area.*

(1) Impact Analysis

(a) Construction

In general, impacts to LAPD services and facilities during the construction of the related project would be addressed as part of the related project's development review process conducted by the City. Should Project construction occur concurrently with that of the nearby related project, coordination among these multiple construction sites would be required and implemented through each development's construction management plan, as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, the related project would 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 to reduce potential impacts to police protection services. Furthermore, given the short-term and intermittent nature of construction activities, construction-related traffic generated by the Project and the related project would not significantly impact LAPD response times within the Project site vicinity as drivers of emergency vehicles have the ability to avoid traffic as previously described above, pursuant to CVC Section 21806. **Therefore, cumulative construction impacts on police protection services would be less than significant.**

(b) Operation

As shown in Table IV.J.2-2 on page IV.J.2-18, based on a household size factor of 2.25 persons per household, the residential component of the one related project, which falls within the boundaries of the Pacific Community Police Station service area, would generate approximately 531 residents. When considering this estimate, the Pacific Division's police service population would increase from 203,379 to 203,910 residents upon buildout of the related project, which would in turn slightly decrease the officer-to-resident ratio for the Pacific Area from the current ratio of 1 officer per 673 residents to 1 officer per 675 residents.

As described above, the Project does not include residential uses and would not add to this additional estimated residential population from the related project. Furthermore, as previously discussed, while the daytime population in the Pacific Community Police Station service area is anticipated to increase as a result of the Project, the Project would implement Project Design Features POL-PDF-1 through POL-PDF-6 to reduce the demand for police protection services on the Project site. Therefore, the Project's incremental impact is not cumulatively considerable.

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

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Employment Service Population	Residential Service Population
1	Del Rey Pointe 5000 S. Beethoven Street	Apartments	236 du		531
Related Project Residential Service Population					531
Project Service Population		Office Retail	165,840 sf ^d 3,400 sf	663 7	0
Total Service Population for Related Project and Project				670	531

du = dwelling units

sf = square feet

^a Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III., Environmental Setting, of this Draft EIR.

^b Based on guidance from the LAPD, the analysis focuses on the increased population associated with residential uses. For informational purposes, this table describes the increase in service population associated with office and retail uses.

^c For residents, the generation rate of 2.25 persons per unit for “Multi-Family Residential” land use was used based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

^d This table shows the net increase in Employment Service Population for the Project. However, to be conservative, the gross increase in Residential Service Population for the related project is used.

Source: Eyestone Environmental, 2023.

Additionally, similar to the Project, the related project would be subject to the City’s routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the 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. In addition, it is anticipated that the related project would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Furthermore, the Project, as well as the related project, would generate revenues to the City’s General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

With regard to emergency response, the Project and related project, would introduce new uses in the Project area that would generate additional traffic. Any resulting traffic congestion would have the potential to increase emergency vehicle response times to the Project site and surrounding properties due to travel time delays. As discussed above, the Project is not anticipated to substantially affect emergency response times in the Pacific Community Police Station service area, and the Project would not contribute to a cumulative impact relative to emergency response times. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

Lastly, consistent with the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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