

IV. Environmental Impact Analysis

G.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 May 11, 2023, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix H.2 of this Draft EIR. Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

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

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

- LAPD Guidelines and Plan Review

(1) State

(a) *California Vehicle Code, Section 21806*

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

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

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

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

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.

found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

(c) California Penal Code

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

(2) Regional

(a) County of Los Angeles Office of Emergency Management

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

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

(3) Local

(a) City of Los Angeles General Plan

(i) Framework Element

The City of Los Angeles General Plan Framework Element (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

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 May 24, 2023.*

amendments of the City's Community Plans Specific Plans, zoning ordinances, and other local planning programs.

Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.G.2-1 on page IV.G.2-5. Specifically, Chapter 9 (Infrastructure and Public Services) of the General Plan Framework addresses infrastructure and public services and includes the following relevant goals, objectives, and policies outlined below in Table IV.G.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) Central City Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework 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.

As discussed in Section IV.E, Land Use and Planning, of this Draft EIR, the Project Site is located within the Central City Community Plan (Community Plan) area. The Central City Community Plan, last updated in 2003, includes the following objectives and policies that are relevant to police protection:

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

**Table IV.G.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.
<hr/> <p><i>Source: City of Los Angeles, City of Los Angeles General Plan Framework Element, 2001.</i></p>	

- Policy 5-1.1: Consult with the Police Department as part of the review of significant development projects and General Plan amendments affecting land use to determine the impact on law enforcement service demands.
- Policy 5-1.2: Promote the establishment of Police facilities and programs which provide police protection at a neighborhood level.
- Objective 5-2: To inform developers, design professionals, and the public of the possible reduction of criminal opportunities when crime prevention principles are developed during the initial planning stages of a development.
 - Policy 5-2.1: Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.

(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 firearms, 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 Computer Statistics Unit (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. The intent of COMPSTAT is to reduce 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 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:
 - Monitoring entrances and exits;

³ LAPD, COMPSTAT, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/, accessed October 9, 2023.

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

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 served by the LAPD’s 21 community police stations.⁵

According to LAPD’s correspondence, the departmental staffing resources within the LAPD included 9,035 sworn officers.⁶ Based on a total City population of 3,985,516, the LAPD currently has an officer-to-resident ratio of 1 officer for every 115 residents (115:1).⁷

⁴ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed October 9, 2023.

⁵ LAPD, *Bureau and Division Map*.

⁶ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H.2 of this Draft EIR.

⁷ $(9,035 \text{ officers} \div 3,985,516 \text{ residents}) \times 1,000 = 2.3 \text{ officers per } 1,000 \text{ residents}$.

The Project Site is located in the Central Bureau, which covers a territory of approximately 65 square miles with a population of approximately 842,700 residents.⁸ The Central Bureau oversees operations in the Central, Hollenbeck, Newton, Northeast, and Rampart service areas as well as the Central Traffic Division.⁹

(2) LAPD Community Police Station

Within the Central Bureau, the Project Site is located within the LAPD's Central Area and is served by the Central Community Police Station located at 251 East 6th Street, approximately 1.2 miles southeast of the Project Site.¹⁰ The location of the police station that serves the Project Site is depicted in Figure IV.G.2-1 on page IV.G.2-9. The Central Community Police Station service area covers approximately 4.5 square miles and is bounded by Stadium Way and the Pasadena Freeway to the north, Washington Boulevard and 7th Street to the south, the Los Angeles River to the east, and the Harbor Freeway to the west.^{11,12} Some of the communities in this service area are Bunker Hill/Historic Core, Central City East, Chinatown, Civic Center, Downtown Los Angeles, Fashion district, Jewelry District, Little Tokyo, Solano Canyon, South Park-Entertainment, Toy District, Old Bank District Artists' Lofts, and Financial District.¹³

Based on data made available by the LAPD's Public Engagement Section and Crime Prevention Through Environmental Design Section, the Central Area includes a service population of approximately 40,000 residents and is staffed by approximately 345 sworn officers and 17 civilian support staff. Based on the police service population of 40,000 residents, the officer-to-resident ratio of the Central Community Police Station is approximately 8.6 officers per 1,000 residents.¹⁴ As such, the officer-to-resident ratio in the Central Area is higher than the citywide ratio of 2.3 officers per 1,000 residents.

⁸ LAPD, *About Central Bureau*, www.lapdonline.org/lapd-contact/central-bureau/, accessed October 9, 2023.

⁹ LAPD, *About Central Bureau*, www.lapdonline.org/lapd-contact/central-bureau/, accessed October 9, 2023.

¹⁰ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H.2 of this Draft EIR.

¹¹ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H.2 of this Draft EIR.

¹² LAPD, *Central Division Map*, August 23, 2021.

¹³ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H.2 of this Draft EIR.

¹⁴ $(345 \text{ officers} \div 40,000 \text{ residents}) \times 1,000 = 8.6 \text{ officers per } 1,000 \text{ residents}$

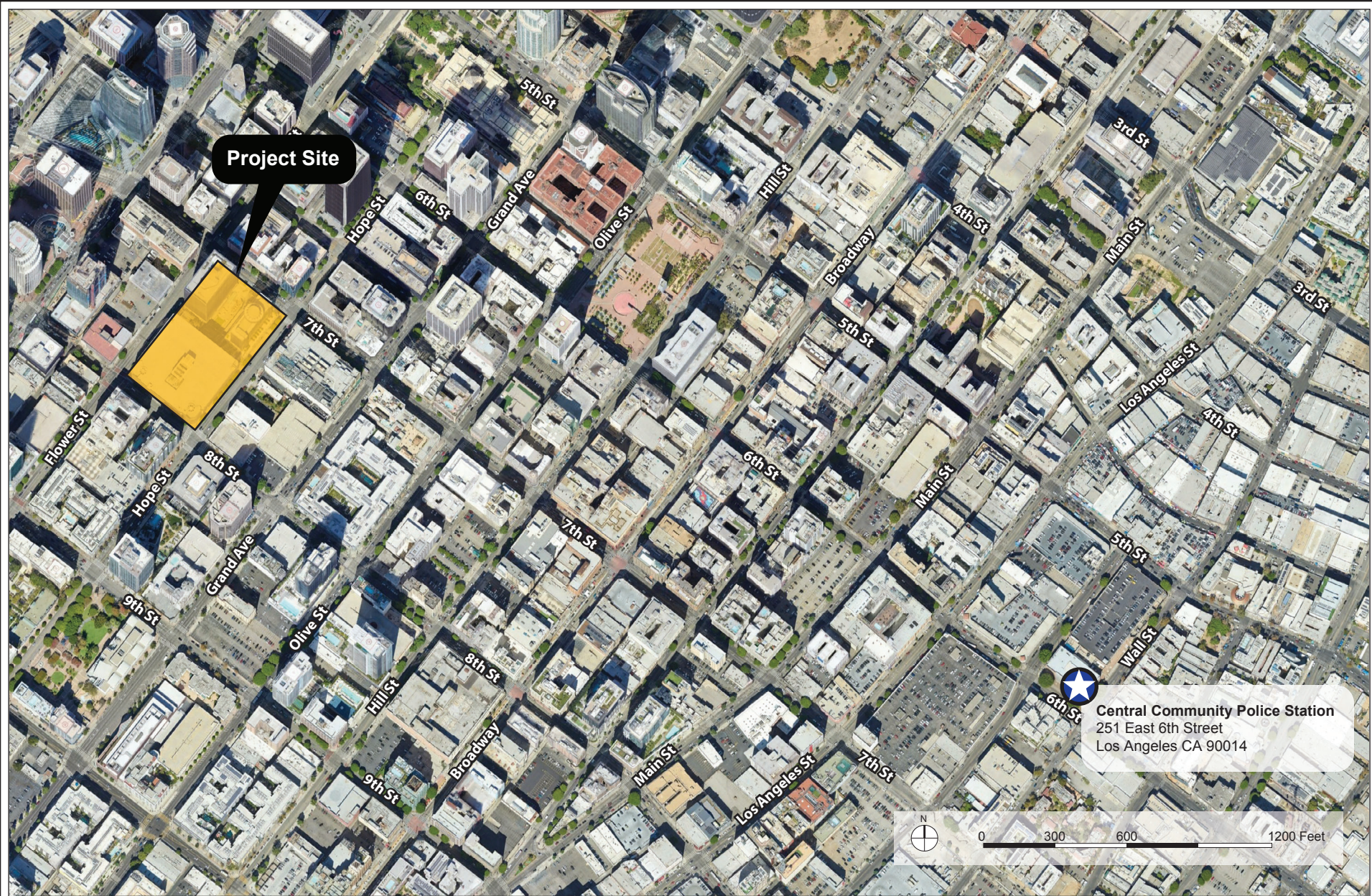


Figure IV.G.2-1
Police Station in the Vicinity of the Project Site

Source: Google Earth Pro, 2024; Eystone Environmental, 2024.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, 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.

For this analysis, the Appendix G threshold provided above is relied upon. The analysis utilizes factors and considerations identified in the *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 *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 services is based on the evaluation of existing police 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 a Project. Project design features that would reduce the impact of the Project on police services are also considered.

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 that project's CEQA document. 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 (MND). However, the ultimate determination of a project's impacts related to police protection is based on whether construction of new or expanded police facilities is a reasonably foreseeable direct or indirect effect of the project. Since there are no current capital improvement plans for the construction or expansion of police facilities in the impact area, further analysis, including a specific location, would be speculative and beyond the scope of this document.

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 of the new building, the Applicant will implement temporary security measures, including security fencing, lighting, and locked entry of construction areas.

Project Design Feature POL-PDF-2: During operation, the Project will provide a dedicated security team for the new tower.

Project Design Feature POL-PDF-3: During operation, the Project will include a closed-circuit security camera system for the new tower.

Project Design Feature POL-PDF-4: The Project will provide lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route to the points of entry into the building.

Project Design Feature POL-PDF-5: The Project will provide lighting of parking areas, elevators, and the residential lobby to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-6: The Project entrances to and exits from the new tower, open spaces around new tower, and the relocated pedestrian walkway along Hope Street will be designed, to the extent practicable, to be open and in view of surrounding sites.

Project Design Feature POL-PDF-7: Upon completion of construction of the new building and prior to the issuance of a building permit for the new building, the Project Applicant will submit a diagram of the Development Area to the LAPD Central 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

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Central Area since the daytime population generated at the Project Site during construction would be temporary in nature. 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, the Applicant would implement temporary security measures, including security fencing, lighting, and locked entry to secure construction areas of the Project Site during construction of the new building. 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.

Project construction activities could also potentially affect LAPD police protection services and response times within the Central Area due to construction impacts on the surrounding roadways. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. As discussed in Section IV.H, Transportation, of this Draft EIR, a Construction Traffic Management Plan (CTMP) 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 near the Project Site during construction activities. As part of the CTMP, the majority of

construction-related traffic, including hauling activities, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response to the Project Site and vicinity as 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.

Based on the above, construction of the Project would not 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. Therefore, impacts with respect to police protection services during Project construction would be less than significant.

(b) Operation

As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. The Project would introduce a new residential and visitor population to the Project Site, which would increase the residential population within LAPD's Central Area.

As discussed in Section II, Project Description of this Draft EIR, the Project would construct 466 new residential units. Based on generation factors from the LADOT's VMT Calculator, the Project would generate approximately 1,049 residents.¹⁵

With the increase in the police service population, the officer-to-resident ratio for the Central Area would decrease from approximately 8.6 officers per 1,000 residents to approximately 8.4 officers per 1,000 residents. Accordingly, the Project would not cause a substantial change in the officer-to-resident ratio for the Central Area.

In addition, the Project would introduce new uses to the Project Site, which would generate additional traffic in the vicinity of the Project Site. As such, Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic congestion. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. Furthermore, the area surrounding the Project Site

¹⁵ *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

includes an established street system, consisting of freeways, arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Accordingly, the street system surrounding the Project Site is not considered substandard. The Project would not modify existing 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. Moreover, pursuant to CVC 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.

Overall, as indicated by LAPD (see Appendix H.2 of this Draft EIR), the Project would not require any special police protection requirements and would not result in the need for new or altered police facilities.¹⁶ Therefore, the Project's impact on police services would be less than significant.

Additionally, as provided in Subsection 3.c., Project Design Features, above, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Features POL-PDF-2 and POL-PDF-3, the Project will expand existing security measures provided for the Project Site by providing a dedicated security team and a closed-circuit security camera system for the new tower. In addition, the Project would provide lighting of building entries and walkways to provide for pedestrian orientation and to clearly identify a secure route to the points of entry into the building, as set forth by Project Design Feature POL-PDF-4, as well as provide sufficient lighting of parking areas within the parking structure, elevators, and new residential lobby to maximize visibility and reduce areas of concealment, as set forth by Project Design Feature POL-PDF-5. Furthermore, pursuant to Project Design Feature POL-PDF-6, entrances to and exits from the new tower, open spaces around the new tower, and the relocated pedestrian walkway along Hope Street will be designed, to the extent practicable, to be open and in view of surrounding sites.

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

¹⁶ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H.2 of this Draft EIR.*

staffing in the community, if and as deemed appropriate. The proposed project design features, as well as the Project's contribution to the General Fund, would help offset the Project's demand for police services.

Furthermore, as described under Subsection 2.a(2)(b)., consistent with Section 35 of Article XIII of the California Constitution, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the above analysis, Project operation would not 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 LAPD's capability to serve the Project Site. Thus, impacts to police protection services 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 2031 (the Project's anticipated buildout year) includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, there are 44 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 44 is a conservative assumption, as some of the related projects may not be built out by 2031, may never be built, or may be approved and/or built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 44 are fully built out by 2031. Of the 44 related projects, 27 related projects fall within the

boundaries of the Central Area, are served by the Central Community Police Station, and include residential uses.

(1) Impact Analysis

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Should Project construction occur concurrently with that of nearby related projects, 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, each 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 projects would not significantly impact LAPD response times within the Project Site vicinity as drivers of police vehicles have the ability to avoid traffic, 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.G.2-2 on page IV.G.2-17, growth from the related projects that fall within the boundaries of the Central Area is estimated to result in a police service population of approximately 26,102 residents. With the addition of the Project's total estimated service population of 1,049 persons, the total cumulative service population would be 27,151 persons in the Central Area. It is noted that the estimated service population for the related projects is also conservative because it does not account for the removal of existing uses and their associated existing service demand. Notwithstanding, when considering these estimates, the Central Area's police service population would increase from 40,000 to 67,151, which would in turn decrease the officer-to-resident ratio for the Central Area from the current ratio of 8.6 officers per 1,000 residents to 5.1 officers per 1,000 residents. Accordingly, cumulative population growth could increase the demand for LAPD services in the Central Area.

With regard to emergency response, the Project and related projects 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 in the Central Area due to travel time delays. However, as discussed above, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel

**Table IV.G.2-2
Estimated Service Population from Related Projects within Central Area**

No.	Project Name/Address	Land Use	Unit/Area	Service Population
1	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartments	436 du	981
2	945 West 8th Street 945 W. 8th St.	Apartments	781 du	1,757
3	8th/Grand/Hope Project 754 S. Hope St.	Condominium	409 du	920
5	Mixed-Use 840 S. Olive St.	Condominium	303 du	682
6	845 Olive & 842 Grand Mixed-Use 845 S. Olive St.	Apartments	208 du	468
7	1018 West Ingraham Street 1018 W. Ingraham St.	Apartments	43 du	97
8	949 South Hope Street Mixed-Use Development 949 S. Hope St.	Apartments	236 du	531
9	Metropolis Mixed-Use 899 S. Francisco St.	Condominium	836 du	1,881
11	Alexan South Broadway 850 S. Hill St.	Apartments	305 du	686
12	Olympic Towers 813 W. Olympic Blvd.	Condominium	374 du	842
14	Hill Street Mixed-Use 920 S. Hill St.	Apartments	239 du	538
15	5th & Hill 323 W. 5th St.	Apartments	31 du	70
20	940 South Hill Mixed-Use 940 S. Hill St.	Apartments	232 du	522
22	Broadway Mixed-Use 955 S. Broadway	Apartments	163 du	367
24	Fig Central 1101 S. Flower St.	Condominium	504 du	1,134
25	Olympia Mixed-Use 1001 Olympic Blvd.	Apartments	879 du	1,978
26	Angels Landing Mixed-Use 332 S. Olive St.	Residential	432 du	972
27	Mixed-Use 601 S. Main St.	Apartments	452 du	1,017
28	1045 South Olive Street 1045 S. Olive St.	Condominium	800 du	1,800
29	Olympic & Hill Mixed-Use 1030 S. Hill St.	Apartments	700 du	1,575
30	Equity Residential Mixed-Use 340 S. Hill St.	Apartments	406 du	914
		Affordable Housing	22 du	50

Table IV.G.2-2 (Continued)
Estimated Service Population from Related Projects within Central Area

No.	Project Name/Address	Land Use	Unit/Area	Service Population
32	Mixed-Use 400 S. Broadway	Apartments	450 du	1,013
34	Amacon Project 1133 S. Hope St.	Condominium	208 du	468
38	11th & Hill Project 1115 S. Hill St.	Condominium	172 du	387
39	Hotel/Restaurant 1099 S. Grand Ave.	Apartments	160 rm	360
43	Residential 350 S. Figueroa St.	Apartments	570 du	1,283
44	Mack Urban (Site 2 & 3) 1105 S. Olive St.	Site 2: Apartment	537 du	1,208
		Site 3: Apartment	713 du	1,604
Related Projects Residential Service Population				26,102
Project Service Population				1,049
Total Residential Service Population for Related Projects and Project				27,151
<hr/> <i>Source: Eyestone Environmental, 2024.</i>				

or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. As such, the Project and related projects are not anticipated to substantially affect emergency response times in the Central Area, and the Project would not contribute to a cumulative impact relative to emergency response times.

Overall, as indicated by LAPD (see Appendix H.2 of this Draft EIR), the Project, individually or combined with related projects, would not result in the need for new or altered police facilities.¹⁷ Therefore, the Project's impact on police services would be less than significant.

In addition, due to the project design features that would be implemented as part of the Project and related projects and the Project's and related projects' contribution to the 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

¹⁷ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H.2 of this Draft EIR.*

appropriate, the Project and related projects are not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Central Area. Additionally, similar to the Project, each 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. The Project and related projects would also be consistent with police protection-related objectives and policies set forth in the Community Plan, including, but not limited to consulting with LAPD to determine the impact on law enforcement service demands and promoting the safety and security of personal property through proper design and effective use of the built environment. 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.¹⁸

Furthermore, 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.

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 projects 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.

¹⁸ *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

(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.