

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 3, 2018, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix L of this Draft Environmental Impact Report (Draft EIR). Additional information included in this analysis is based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

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

- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management (OEM)
- City of Los Angeles General Plan
 - Framework Element
 - Central City North Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes

- Los Angeles Police Department (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

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.

safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

(c) California Penal Code

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of 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.

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 January 5, 2022.*

(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.

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 General Plan 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) *Central City North Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. As discussed in Section IV.H, Land Use, of this Draft EIR, the Project Site is located within the Central City North Community Plan area. The Central City North Community Plan, adopted on December 15, 2000 and amended on September 7, 2016, describes specific goals and policies related to police

**Table IV.J.2-1
Relevant General Plan Police Protection Goals, Objectives, and Policies—Framework Element:
Chapter 9, Infrastructure and Public Services**

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

protection services and public safety. Policies and objectives relevant to the Project are as follows³:

- Objective 8-1: To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.
 - Policy 8-1.1: Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.
- Objective 8-2: To increase the community's and the Police Department's ability to minimize crime and provide adequate security.

³ *City of Los Angeles, Central City North Community Plan, adopted December 15, 2000, amended September 7, 2016.*

- Policy 8-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch and the Senior Lead Officer Program), through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, assistance in the formation of new neighborhood watch groups, and regular communication with neighborhood and civic organizations.
- Policy 8-2.2: Ensure that landscaping around buildings be placed so as not to impede visibility.
- Policy 8-2.3: Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.

(b) City of Los Angeles Charter

The City Charter at Section 570 gives the power and 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 Los Angeles Fire Department (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. COMPSTAT has effectively and significantly reduced the occurrence of

crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.⁴

(e) LAPD Guidelines and Plan Review

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

⁴ LAPD, COMPSTAT Division – Crime Mapping, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/, accessed September 27, 2022.

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.⁵ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD's 21 community police stations.⁶ Each geographic bureau is comprised of four to five geographic areas/police stations.⁷

As of December 2021, the departmental staffing resources within the LAPD included 9,521 sworn officers. Based on a total City population of 4,015,546 the LAPD currently has an officer-to-resident ratio of approximately 2.37 officers for every 1,000 residents.⁸

The Project Site is located in the Arts District area of Downtown Los Angeles at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street within LAPD's Central Bureau. The Central Bureau covers a territory of approximately 65 square miles, contains approximately 842,700 residents, and oversees operations in the Central, Hollenbeck, Newton, Northeast, and Rampart service areas along with the Central Traffic Division.⁹

(2) LAPD Community Police Station

Within the Central Bureau, the Project Site is located within the Newton service area and is served by the Newton Community Police Station located at 3400 South Central Avenue, approximately 2.8 miles southwest of the Project Site.¹⁰ The location of the police station that serves the Project Site is depicted in Figure IV.J.2-1 on page IV.J.2-9. The Newton Community Police Station has a service area of approximately 9 square miles and serves the neighborhoods of Fashion District, South Park District, and Pueblo Del Rio

⁵ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed January 5, 2022.

⁶ LAPD, *Your LAPD by Bureau, Division, and Community, Find Your Local Police Station*, www.lapdonline.org/find-your-local-police-station/, accessed January 5, 2022.

⁷ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed January 5, 2022.

⁸ LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 11/28/21 to 12/25/21*.

⁹ LAPD, *Your LAPD by Bureau, Central Bureau*, www.lapdonline.org/lapd-contact/central-bureau/, accessed January 5, 2022.

¹⁰ Written correspondence from Darnell D. Davenport, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, December 3, 2018. See Appendix L of this Draft EIR.

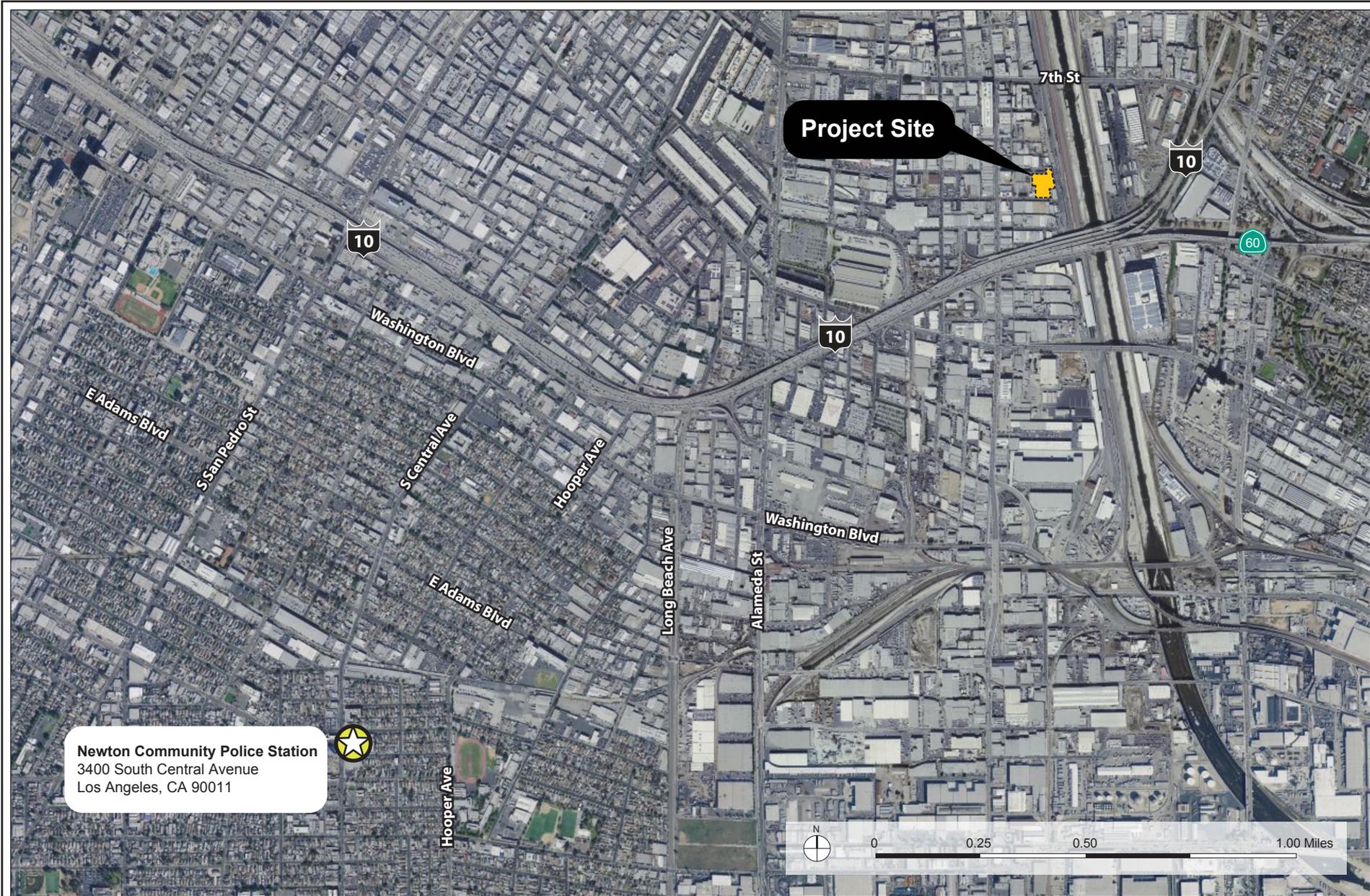


Figure IV.J.2-1

Police Station Serving the Project Site

Housing Development.¹¹ This station serves a population of approximately 150,000 persons and is staffed by approximately 323 sworn officers and 32 civilian support staff.¹² The average response time for service in the Newton Area in 2018 was 4.1 minutes for emergency calls and 29.9 minutes for non-emergency calls.¹³ Based on data made available by the LAPD Community Relationship Division, the service population of the Newton Area is approximately 150,000 persons, and the officer-to-resident ratio is approximately 2.15 officers per 1,000 residents in the Newton Area. As such, the officer-to-resident ratio in the Newton Area is slightly lower than the citywide ratio of approximately 2.37 officers per 1,000 residents.^{14,15}

(3) LAPD Crime Statistics

Table IV.J.2-2 on page IV.J.2-11 provides a comparison of the Newton Community Police Station service area and citywide data regarding crimes as reported by the LAPD based on only residential populations. As shown therein, based on the most recent data made available by COMPSTAT for the year 2021, approximately 5,712 crimes were reported within the Newton Community Police Station service area and 117,702 crimes were reported citywide. Based on the service population of the Newton Community Police Station, approximately 38.1 crimes per 1,000 residents were reported in the Newton Community Police Station service area and 29.3 crimes per 1,000 residents were reported citywide.

Based on the number of sworn officers staffing the Newton Community Police Station (323 sworn officers), the 2021 ratio of crimes per officer is 17.68 crimes per officer in comparison to a citywide ratio of 12.36 crimes per officer (9,521 sworn officers citywide).^{16,17} Thus, the Newton Area has a higher crime per officer ratio compared to the citywide ratio.

¹¹ LAPD, *Your LAPD by Division, Newton Community Police Station*, www.lapdonline.org/lapd-contact/central-bureau/newton-community-police-station/, accessed January 5, 2022.

¹² Written correspondence from Darnell D. Davenport, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, December 3, 2018. See Appendix L of this Draft EIR.

¹³ Written correspondence from Darnell D. Davenport, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, December 3, 2018. See Appendix L of this Draft EIR.

¹⁴ $(323 \text{ sworn officers} / 150,000 \text{ residents}) \times 1,000 = 2.15 \text{ officers per } 1,000 \text{ residents}$.

¹⁵ $(9,521 \text{ sworn officers} / 4,015,546 \text{ residents}) \times 1,000 = 2.37 \text{ officers per } 1,000 \text{ residents}$.

¹⁶ $5,712 \text{ crimes} / 323 \text{ sworn officers} = 17.68 \text{ crimes per officer}$.

¹⁷ $117,702 \text{ crimes} / 9,521 \text{ sworn officers} = 12.36 \text{ crimes per officer}$.

**Table IV.J.2-2
2021 Part I Crimes—Newton Area and Citywide**

	Crimes^a	Resident Population	Crimes per 1,000 Residents
Newton Area	5,712	150,000	38.1
Citywide	117,702	4,015,546	29.3

^a Crime data includes homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft.

Source: LAPD, COMPSTAT Unit, COMPSTAT Newton Area Profile 11/28/21–12/25/21 and COMPSTAT Citywide Profile 11/28/21–12/25/21. Note that the date ranges in this source citation are in the title of the COMPSTAT Area Profile reports used which are published monthly—the data in this table is from the YTD column of the reports which covers the last few days of 2020 through 12/25/21.

The Project Site is currently developed with three buildings totaling 39,328 square feet of light industrial, office and creative floor area. The Project Site also contains shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, designated areas for storage of industrial byproducts, and surface parking. These existing on-site uses and associated estimated 108¹⁸ employees currently generate a small (primarily daytime) demand for police protection service from the Newton Community Police Station.

3. Project Impacts

a. Thresholds of Significance

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

¹⁸ Based on the employee generation factors from the City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Specifically: 0.001 employees per square foot for the 16,222 square feet of existing light industrial floor area (16 employees); and 0.004 employees per square foot for the existing 23,106 square feet of office and creative office floor area (92 employees). 16 + 92 = 108.

In assessing impacts related to police protection in this section, the City uses Appendix G as the thresholds of significance. The factors identified below from the City's *L.A. CEQA Thresholds Guide* are used where applicable and relevant to assist in analyzing the CEQA Guidelines Appendix G thresholds. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate 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(s) 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. Project design features and any mitigation measures that would reduce the impact of the Project on police services are also described. Estimates of the numbers of residents and employees to be generated by the Project are based on the generation factors for the proposed uses in the City's VMT Calculator Documentation.

The need for or deficiency in adequate police services in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional police services resulting in the need to construct new police 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. Whether there is a significant impact to the environment related to police services that will result from a project is determined by whether the construction of new or expanded police facilities, which would cause significant environmental impacts, is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of police facilities in the Project 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 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

c. Project Design Features

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, and locked entry.

Project Design Feature POL-PDF-2: The Project will include private on-site security, alarm systems, a closed circuit security camera system, and keycard entry for the building and the parking areas.

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

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

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

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant will submit a diagram of the Project Site to the LAPD's Newton 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 Newton Area. In addition, since the existing uses on the Project Site, which include three buildings totaling 39,328 square feet of light industrial, office and creative floor area with an estimated 108¹⁹ total existing employees, currently generate a daytime population that generates a demand for LAPD police protection services, any demand for police protection services generated during construction of the Project would be offset by the removal of the existing uses on the Project Site. Furthermore, the daytime population 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. Therefore, pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be reduced, resulting in less demand for police protection services and associated government facilities.

Project construction activities could also potentially impact LAPD police protection services and response within the Newton Area due to construction impacts on the surrounding roadways. As discussed in Section IV.K, Transportation, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane narrowing, temporary sidewalk 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. could affect police response to sites surrounding the Project Site and along Bay Street, Sacramento Street, and other /streets in the Project area due to travel time delays caused by traffic during the construction phase. However, any such impacts would be temporary and would end upon the completion of construction activities. Also, given the permitted hours of construction

¹⁹ Based on the employee generation factors from the City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Specifically: 0.001 employee per square foot for the 16,222 square feet of existing light industrial floor area (16 employees); and 0.004 employee per square foot for the existing 23,106 square feet of office and creative office floor area (92 employees). 16 + 92 = 108.

and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan and Worksite Traffic Control Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site, and that the free flow of traffic is mainlined along the streets in the Project area, during construction activities. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response within the Project 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 analysis, upon implementation of the project design features and regulatory requirements, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would exceed the capability of the LAPD to serve the Project Site. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD’s capability to serve the Project Site; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Furthermore, the Project would not cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to Project construction. Therefore, impacts on police protection during Project construction would be less than significant.

(b) Operation

As previously discussed, the LAPD determines service capacity based on the potential for the annual crimes per resident to exceed current averages due to the addition of a Project. As discussed in Section II, Project Description, of this Draft EIR, upon buildout, the Project Site would include a three-building creative office campus on a 1.70-acre site that would include 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant space. The Project does not include the development of residential uses. As such, the Project would not directly affect the existing officer-to-resident ratio within the Newton Area. However, the Project would introduce a new employee and visitor population to the Project Site which could result in an indirect demand for LAPD police protection service in the Newton Area.

As discussed above, the Project Site is served by the Newton Community Police Station located at 3400 South Central Avenue, approximately 2.8 miles southwest of the Project Site. The Newton Community Police Station is staffed by 323 sworn officers and a 32-person civilian support staff. As shown in Table IV.J.2-3 on page IV.J.2-16, the

**Table IV.J.2-3
Estimated Project Service Population for the Project Site**

Land Use	Units	Conversion Factor ^a	Total Police Service Population
Existing			
Creative Office/Office	23,106 sf	0.004	92
Light Manufacturing	16,222 sf	0.001	16
<i>Total Existing</i>			108
Proposed at Buildout			
Creative Office	217,189 sf	0.004	869
Retail/Restaurant	5,000 sf	0.004	20
<i>Total Proposed</i>			889
Project Net Police Service Population (Proposed – Existing)			781
<hr/> <p><i>du = dwelling units</i> <i>sf = square feet</i> <i>Totals may not sum due to rounding.</i> ^a <i>Number of employees is based on the employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i> <i>Source: Eyestone Environmental, 2022.</i></p>			

Project’s estimated net police service population would be 781 persons attributable to potential employment opportunities generated by the proposed uses. Long-term operation of the Project would result in an increase of employees and visitors within the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. However, since the Project does not propose any residential units, the existing officer-to-resident ratio, which is currently 2.15 officers per 1,000 residents, would remain unchanged by the Project. Therefore, the Project would not change the officer-per-resident ratio for the Newton Area.

In addition, as provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include several operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a private on-site security, alarm systems, closed circuit camera system, and keycard entry for the creative office building and parking areas. In addition, the Project would include proper lighting of buildings and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3, and would also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment, as set forth

by Project Design Feature POL-PDF-4. Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Furthermore, as specified in Project Design Feature POL-PDF-6, the Applicant would submit a diagram of the Project Site to the LAPD's Newton Area Commanding Officer that includes access routes and any additional information that might facilitate police response. The Project's design features would help offset the Project-related increase in demand for police services and minimize the need for new or altered facilities.

Furthermore, 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.²⁰

Overall, as provided by the LAPD in their letter included in Appendix L of this Draft EIR, a project of this size could have a "minor impact" on police services in the Newton Area.

Regarding police emergency vehicle response, the Project would introduce new uses to the Project Site which would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial delay in emergency response to the Project area due to traffic congestion. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways.

Regarding police emergency access, 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. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Therefore, the Project would not adversely affect police emergency response due to Project design and traffic congestion.

²⁰ *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

Lastly, as discussed above in Subsection 3.b, Methodology, in conformance with California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.²¹

Based on the above analysis, the Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, Project operation would not necessitate the provision of new or physically altered government 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 with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts with regard to police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2025 (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, a total of 72 related projects are located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 72 is a conservative assumption, as some of the related projects may not be built out by 2025, may never be built, or may be approved and built at reduced densities. To provide a conservative

²¹ *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal, App. 4th 833, 843.

forecast, the future baseline forecast assumes that Related Project Nos. 1 through 72 are fully built out by 2025, unless otherwise noted. Additionally, much of this growth has been anticipated by the City and incorporated into the combined update to the Central City and Central City North Community Plans, known as the DTLA 2040 Plan (or the Downtown Community Plan Update, currently in process).²² Of the 72 related projects, 10 fall within the boundaries of the Newton Area and are served by the Newton Community Police Station.

(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, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan and Worksite Traffic Control Plan, as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. Since the implement of these plans would ensure both the free flow of traffic around, and that emergency access to the Project Site and adjacent properties is maintained, during the construction period, the Project would not have significant impacts on emergency access and safety. 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 within the Project Site vicinity as drivers of police vehicles have the ability to avoid traffic, pursuant to CVC Section 21806. Finally, the Project in and of itself would not cause a significant impact to police services during construction. **Therefore, the Project's contribution to cumulative construction-related police protection impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, would not be cumulatively considerable. As such, cumulative construction-related police protection impacts would be less than significant.**

²² *Regarding the DTLA 2040 Plan: (1) an EIR was prepared for it; (2) the City Planning Commission recommended approval of it on September 23, 2021; (3) the City Council has yet to adopt it; and (4) it is subject to change. According to the DTLA 2040 webpage, (accessed September 15, 2021), an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.*

(b) Operation

As shown in Table IV.J.2-4 on page IV.J.2-21, , the residential component of related projects that fall within the boundaries of the Newton Area and that would be served by the Newton Community Police Station would generate approximately 4,557 residents. Accordingly, the Newton Area police service population would increase from 150,000 to 154,557 residents. The related projects that are non-residential in nature would introduce a new employee and visitor population to the police service population of the Newton Area. However, as no residential uses are proposed, these related projects would not increase the LAPD residential service population in the Newton Area.

The degree of cumulative population growth could increase the demand for LAPD services in the Newton Area. However, as described above, the Project would include 217,189 square feet of office space and 5,000 square feet of retail and restaurant space. The determination of impact on capability of existing police services is based in part on the increase in residential service population due to the addition of a project. Thus, the Project's incremental impact would not be cumulatively considerable since the Project does not propose the development of residential uses, which would directly affect the officer-to-resident ratio in the Newton Area. In addition, the Project would implement project design features to enhance on-site safety and reduce the Project's operations-related police protection service demand. Therefore, the Project's contribution to cumulative operational police protection impacts would not be cumulatively considerable.

Similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a required 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.²³ In addition, it is anticipated that the related projects 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 projects, 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.

²³ *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–2021.*

**Table IV.J.2-4
Estimated Resident Service Population from Related Projects within Newton Area**

No.^a	Project Name	Land Use^b	Size	Conversion Factor^c	Resident Service Population	
4	826 S. Mateo St.	Live/Work Condos	90 du	2.25 res/du	203	
10	1800 E. 7th St.	Apartments	122 du	2.25 res/du	275	
17	785 S. Town Ave	Joint Living and Work Quarters	60 du	2.25 res/du	135	
19	City Market Project 1057 S. San Pedro St.	Apartments	945 du	2.25 res/du	2,126	13
36	1000 S. Mateo St.	Apartments	113 du	2.25 res/du	254	
39	2110 Bay Development 2110 Bay St.	Apartments	110 du	2.25 res/du	248	
49	1200 S. Santa Fe	Apartments	53 du	2.25 res/du	119	
61	655 San Pedro St.	Apartments	81 du	2.25 res/du	182	
64	1024 S. Mateo St.	Apartments	104 du	2.25 res/du	234	
65	2143 E. Violet St.	Apartments	347 du	2.25 res/du	781	
Related Projects Residential Service Population					4,957	
Project Residential Service Population					0	
Total Residential Service Population for Related Projects and Project					4,557	
<hr/> <p><i>res = residents</i> <i>du = dwelling units</i> <i>Totals may not sum due to rounding.</i></p> <p>^a <i>Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.</i></p> <p>^b <i>Based on guidance from the LAPD, the analysis focuses on the increased population associated with residential uses.</i></p> <p>^c <i>The conversion factor applied is the multi-family residential factor (i.e., 2.25 res/du) from LADOT and DCP, City of Los Angeles VMT Calculator Documentation, Table 1, May 2020.</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>						

With regard to police emergency response, the Project, related projects, and other future development within the Central City North Community Plan area would introduce new uses to the Project Site that would generate additional traffic in the vicinity of the Project Site. Traffic from the Project, related projects, and other future development within the Central City North Community Plan area would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays

caused by the additional traffic. As discussed previous Project-level analysis, the Project is not anticipated to substantially affect existing police emergency response in the Newton Area. Hence, the Project's contribution to police emergency response impacts would not be cumulatively considerable. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. As is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Additionally, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City.²⁴ Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. 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 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. 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, the Project's contribution to cumulative impacts on police protection during construction and operation would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

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

²⁴ (2015) 242 Cal.App.4th 833.

(3) Level of Significance After Mitigation

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