

IV. Environmental Impact Analysis

I.2 Public Services – Police Protection

1. Introduction

This section analyzes whether the Project's new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) May 24, 2022, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix I-2 of this Draft Environmental Impact Report (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, regulations, 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, including:
 - Framework Element
 - Central City Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- Los Angeles Police Department (LAPD) Computer Statistics Unit Program
- Los Angeles Police Department Guidelines and Plan Review

(1) State

(a) *California Vehicle Code, Section 21806*

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

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

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

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

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.

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

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 September 15, 2022.

Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

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

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

SOURCE: City of Los Angeles, General Plan Framework Element, 2001.

(ii) Central City Community Plan

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

The Project Site is located within the Central City Community Plan area. The Community Plan provides two objectives and three policies regarding police protection as shown in **Table IV.I.2-2, *Relevant Central City Community Plan Objectives and Policies***.

**TABLE IV.I.2-2
RELEVANT CENTRAL CITY COMMUNITY PLAN OBJECTIVES AND POLICIES**

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

SOURCE: City of Los Angeles, Central City Community Plan, 2003.

(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. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.³

(e) LAPD Guidelines and Plan Review

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD's Design Out Crime Guidelines, which 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:

³ LAPD, COMPSTAT, http://www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed March 16, 2022.

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.”

b) Existing Conditions

(1) LAPD Service Areas and Bureaus

The LAPD provides police protection services in the City of Los Angeles, covering approximately 468 square miles and including 21 community police service areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. The LAPD also has a variety of specialized units including Special Weapons and Tactics (SWAT), Off-Road Enforcement, Mounted Unit, Special Operations Support Division, Air Support Division, K-9 Unit, Animal Cruelty Task Force, Gangs and Narcotics Division, and Specialized Enforcement Section (Motors and Commercial Enforcement).⁴

Department wide, LAPD has 9,479 sworn personnel and 3,099 civilian employees serving a population of 4,015,940 persons (as of May 2020).⁵ This population equates to a

⁴ LAPD, Inside the LAPD, <https://www.lapdonline.org/lapd-organization-chart/>, accessed September 14, 2022.

⁵ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

resident to office ratio of 423.9 residents for every one officer (423:1). However, this number can be fluid.

The Project Site is located within the LAPD’s Central Community Police Station’s “Geographical Patrol Area,” which is approximately 4.5 square miles and consists of 47 Reporting Districts (RDs). The service boundaries for Central Community Police Station meander along various city streets, but can generally be characterized as follows:

- To the west is the Harbor Freeway (I-110)
- To the north is the Harbor Freeway (I-110)
- To the east is the Los Angeles River
- To the south is the Santa Monica Freeway (I-10), extending to Washington Boulevard.

The Project Site is located within three RDs, consisting of RD 0138, 0148, and 0158. RD 0138 is bounded by Los Angeles Street to the west, 2nd Street to the north, Alameda Street to the east and 4th Street to the south. RD 0148 is bounded by San Pedro Street to the west, 4th Street to the north, Central Street to the east, and 5th Street to the south. RD 0158 is bounded by Stanford Avenue and Central Avenue to the west, 4th Street to the north, Alameda Street to the east, and 7th Street to the south.

(2) LAPD Central Community Police Station

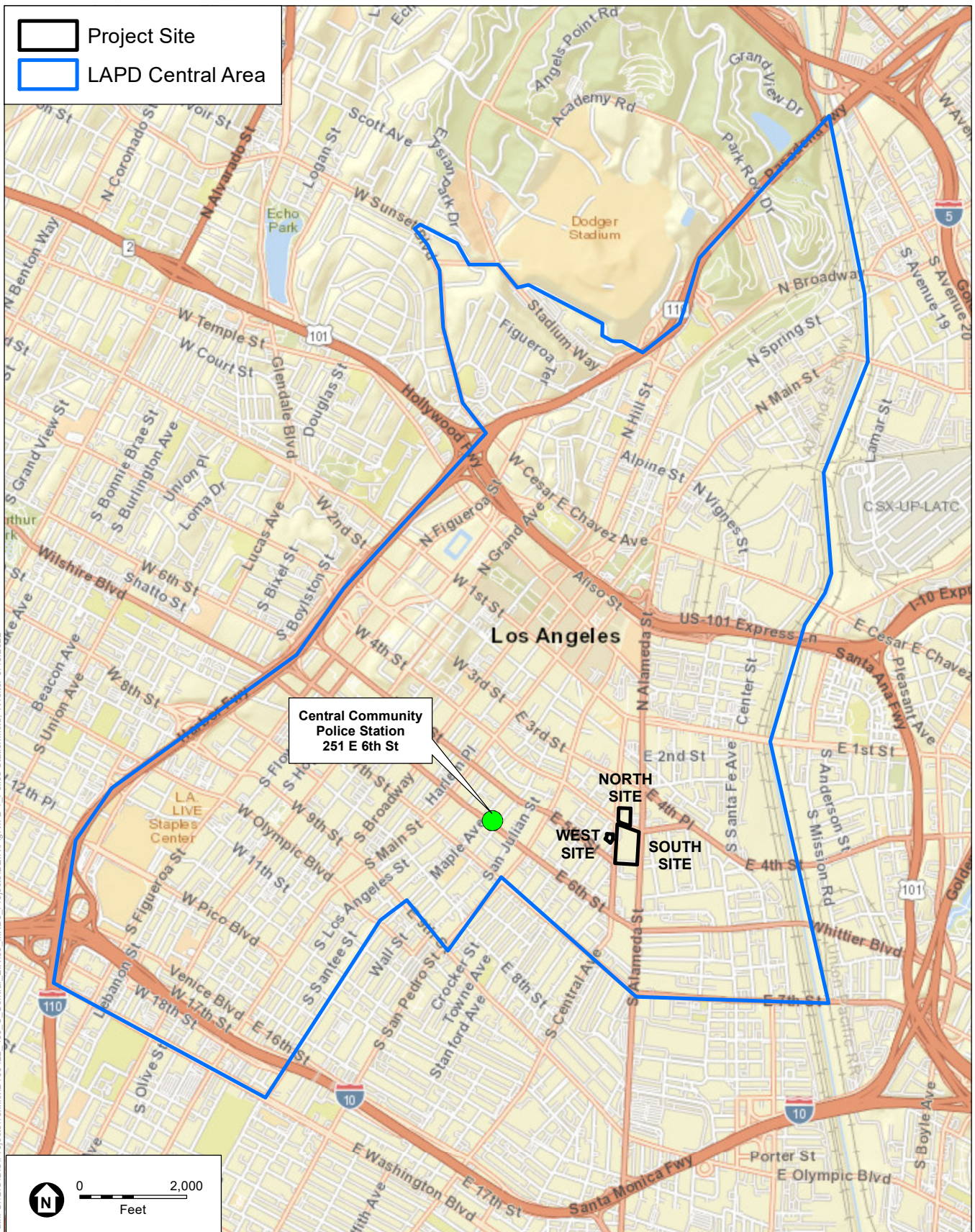
The Project Site is served by the Central Community Police Station, located at 251 East 6th Street, approximately 0.7 mile west of and three minutes from the Project Site,⁶ as shown in **Figure IV.I.2-1**, *Location of Central Community Police Station*.

The Central Community Police Station serves an area including the 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 the Financial District.⁷ The Central Community Police Station has approximately 308 sworn personnel and 11 civilian support staff assigned and provides service to a residential population of approximately 40,000 residents.⁸ The resident to officer ratio is 129.8 residents for every one officer (129.8:1).

⁶ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

⁷ LAPD, <https://www.lapdonline.org/lapd-contact/central-bureau/central-community-police-station/>. Accessed March 19, 2022.

⁸ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.



SOURCE: ESRI 2022, LAPD Central Bureau 2022.

Fourth & Central Project

Figure IV.I.2-1
Location of Central Community Police Station

The LAPD Headquarters Facility and LAPD Security Division are also within the LAPD Central Area and would be readily available to assist the Central Community Police Station in any investigations or unusual occurrences. Furthermore, as with all municipal police departments in Los Angeles County, the LAPD participates in the mutual aid agreements with other law enforcement agencies within the County for the shared use of police personnel and resources during emergency and/or conditions of extreme peril. According to the LAPD, there are no current plans to expand the Central Area Division or to build a new facility to service the Central Area.⁹

(3) Response Times

LAPD correspondence regarding the Project cites COMPSTAT data regarding the Central Divisions average police response time during the four-week period between April 17, 2022, to May 14, 2022, to emergency, high priority calls (Code 3 calls) as 3.3 minutes, with a dispatch median time of 1.8 minutes.¹⁰ The median high priority, non-emergency response time (Code 2) was 13.6 minutes, with a dispatch median time of 6.9 minutes. Low priority, non-emergency calls had a dispatch median time of 20.2 minutes.

Citywide response times during the same four-week period were 4.7 minutes for emergency, high priority calls (Code 3) with a dispatch median time of 1.5 minutes. The median non-emergency, high priority (Code 2) response times were 5.2 minutes with a dispatch time of 16.1 minutes. Low priority, non-emergency response times were 35.4 minutes with a dispatch time of 14.9 minutes.

During this same four-week time period, Central Division answered 525 high priority emergency (Code 3) calls for service, 2,029 non-emergency high priority (Code 2) calls and 1,099 low priority non-emergency calls. Citywide, LAPD answered 7,497 high priority, emergency (Code 3) calls for service, 28,565 medium high priority non-emergency (Code 2) calls and 1,414 low priority non-emergency calls. According to the LAPD, the described response times are adequate performance times for the Central Division.

(4) LAPD Crime Statistics

Currently, the LAPD operates under a COMPSTAT Program that implements the Framework Element's goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model.

⁹ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

¹⁰ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022

Table IV.I.2-3, Population, Officer, and Crime Comparison (2021), lists statistical data provided by the LAPD regarding the Central Division and the City’s resident population, number of sworn officers, office per resident ratio, number of crimes, and crimes per 1,000 residents for the year 2021, the latest full year of available data.

**TABLE IV.I.2-3
POPULATION, OFFICER, AND CRIME COMPARISON (2021)^a**

Service Area	Square Miles	Resident Population	Sworn Officers	Resident: Officer Ratio	2021 Reported Crimes	Crimes per 1,000 Residents
Central Division	4.5 ^a	40,000 ^a	308 ^a	129.8:1 ^a	2,343 Violent Crimes 5,585 Property crimes 7,928 Total Crimes	198.2 ^b
Citywide ^c	472.9 ^c	4,015,940 ^c	9,479	423:1 ^d	30,078 Violent Crimes 90,090 Property Crimes 120,168 Total Crimes	29.9 ^e

NOTE(S):

^a LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022, provided in Appendix I-2 of this Draft EIR.

^b (7,928 crimes) / (40,000 residents / 1,000 residents) = 198.2 crimes per 1,000 residents.

^c Population is current up to May 21, 2020, according to the 2010-2018 American Community Survey and the US Census. It does not include non-residents, but those who responded to the census.

^d 4,015,940 residents/9,479 officers = 423 residents / 1 officer.

^e (120,168 crimes) / (4,015,940 residents / 1,000 residents) = 29.9 crimes per 1,000 residents.

SOURCE: ESA, 2022.

(5) Existing Site Features

The loading dock areas on the North Site do not contain gates or fences to block/restrict access to this portion of the Project Site. The parking/loading areas in the South Site are fenced to prevent public access after operating hours. The West Site parking lot is also fenced to prevent unobstructed public access. The streets surrounding the Project Site include streetlights and on-site parking/loading areas include security lighting and cameras.

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 services if it would:

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

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 *the 2006 L.A. CEQA Thresholds Guide* were 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

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to serve existing and future population in the Project vicinity adequately, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services and potential need for new or expanded police facilities. The analysis presents statistical data for the Central Area and Citywide, including the ratio of crimes to residents and the ratio of sworn police officers to residents. The ratio of police officers to residential population is used by LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for the Project. LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population.

The Project's police service population includes new residents as well as employees at the Project Site. The Project's residential population and number of employees were

calculated based on persons per household rates and employees generation rates by land use, respectively, in City of Los Angeles Department of Transportation's (LADOT) VMT Calculator. See Section IV.H, *Population and Housing*, of this Draft EIR for the calculations of Project residents and employees. While the police service population calculates service population for non-residential uses, the LAPD does not provide crime rates or police officer service ratios for non-residential uses and does not use such ratios to measure service levels.

In consideration of the above factors, a determination is made as to whether the LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAPD was consulted, and its responses were incorporated regarding the Project.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact. 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 this EIR. The ultimate determination of whether there is a significant impact to the environment related to police protection services from a project is determined by whether construction of new or expanded police protection facilities 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 impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

c) Project Design Features

(1) Construction

Refer to Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) in Section IV.J, *Transportation*, of this Draft EIR. In addition, the following Project Design Feature related to police protection services during Project construction will be implemented as part of the Project:

- **POL-PDF-1: Security Features During Construction.** Private security personnel will monitor vehicle and pedestrian access to the construction areas and patrol the Project Site, construction fencing with gated and locked entry will be installed around the perimeter of the construction site, and security lighting will be provided in and around the construction site.

(2) Operation

The following Project Design Feature related to police protection services during Project operation will be implemented as part of the Project:

- **POL-PDF-2: Security Features During Operation.** The Project will incorporate a security program to ensure the safety of its residents, employees, and visitors. Design strategies within the Project design would include, but not be limited to, the following:
 - Hallways and corridors would be straight forward with no dark corners, as possible;
 - Outdoor areas would be exposed to windows and allow for natural surveillance;
 - Clear transitional zones would be provided between public, semi-public and private spaces;
 - Access key cards and cameras would be used, as necessary; and
 - Interior and exterior spaces would be well lit with proper signage to direct the flow of people and decrease opportunities for crime.

In addition, the following security measures would be implemented by the Project:

- Installing and utilizing a security camera network throughout the Project Site.
- Controlled access to all building elevators, residences, and resident-only common areas through electronic access control equipment specific to each user, as possible.
- Training employees on appropriate security policies for the Project's buildings. Duties of the staff would include, but would not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and monitoring the Project Site.
- Providing a security program for the ground level open space areas.
- Access to commercial uses would be unrestricted during business hours, with public access discontinued after businesses, such as retail and restaurant uses, have closed.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction Impacts

During construction, equipment, building materials, vehicles, and temporary offices would be temporarily located on the Project Site, which could be subject to theft or vandalism. Therefore, when not properly secured, construction sites can result in an increase in demand for police protection services. Consequently, developers typically take precautions to prevent trespassing through construction sites, such as installation of temporary fencing around the construction site to keep potential trespassers out and deployment of roving security guards to prevent problems during a project's construction. When such precautions are taken, there is typically less of a need for local law enforcement at a construction site.

As provided in Project Design Feature POL-PDF-1, these potential impacts would be addressed through a number of security measures to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. Construction fencing with gated and locked entry would be installed around the perimeter of the construction site. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or abused. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project's potential need for police protection services during the construction phase.

A Construction Traffic Management Plan (TRAF-PDF-1) subject to review and approval by LADOT will be incorporated into the Project. The Construction Traffic Management Plan would include elements such as street closure information, detour plans, haul routes, and staging plans and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police responses.

In addition, 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 California Vehicle Code Section 21806. Furthermore, Project construction activities would be temporary and intermittent, and construction haul routes would require approval by LADOT prior to construction. Therefore, Project construction would not result in substantial adverse impacts to emergency response times and emergency access. The Project Site is largely available to access from the adjacent roadways (i.e., Central Avenue, Alameda Street, 4th Street). The majority of the construction staging would occur within the Project Site, limiting potential conflicts with traffic on local streets. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to police protection services would be considered less than significant due in part to the following:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD and LAFD (refer to Project Design Feature TRAF-PDF-1 in Section IV.L, *Transportation*, of this Draft EIR);
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC.

As there would be private security personnel, no additional officers from LAPD would be needed to monitor the Project Site during construction outside of existing officers that patrol the area. Any potential LAPD officers needed to patrol the Project Site would be from the existing officers at the Central Community Police Station. Additionally, the various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses. **Therefore, impacts resulting from Project construction would not create the need for new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service. As such, impacts would be less than significant.**

(b) *Operational Impacts*

(i) *Project Police Service Population and Crime Rate*

The Project would introduce new resident, visitor, employee and customer populations and would increase the existing number of employees at the Project Site, which would increase the demand for police protection from LAPD. As discussed in Section IV.H, *Population and Housing*, of this Draft EIR, the Project would provide 1,521 new residential units resulting in 3,423 residents. In addition, the project would result in approximately 1,975 net new employees.

The increase in residential population from approximately 40,000 to 43,423 in the LAPD Central Community Station service area would increase the resident to officer ratio from

129.8:1 to 141:1.¹¹ This is still significantly below the Citywide average of one officer per 423.7 residents. This increase in demand also does not account for benefits provided through Project security personnel and security design features. Given the one officer per 141 resident ratio with inclusion of the Project, compared to the one officer per 423 resident ratio Citywide, and the Project's security personnel and design features, it is unlikely that additional officers would be needed to serve the Project. Nonetheless, if it were determined that additional officers would be needed to maintain the existing ratio, and if hiring of officers was solely based on maintaining existing service ratios, approximately 26 additional officers would be required to maintain the ratio of one officer per 129.8 residents.¹² Although the true need for additional hires would be determined by LAPD through their periodic assessment of staffing in light of multiple factors, 26 additional officers would increase the existing officer total of 308 to 334 total officers or an increase of approximately 8.4 percent of officers at the Central Community Police Station.

As noted above, LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population. Nonetheless, if the non-residential population were combined with the residential population (police service population), the Project would generate a net total increase of 5,398 people (residents, employees, visitors) who would require police protection services.

(ii) Project Police Service Impact Assessment

It is recognized that LAPD determines the need for new officers based on a variety of factors, which could be influenced by the current ratio of officers to residents in the area, shifts in station and/or patrol boundaries, ongoing staff changes, service populations, crime statistics and technological enhancements.

As provided in Project Design Feature POL-PDF-2, the Project would incorporate a security program to ensure the safety of Project residents, employees and visitors. The buildings would include controlled access to the multi-family residential units, hotel units, office uses, and private open space areas. Access to commercial and restaurant uses, publicly accessible open space areas, and paseos would be unrestricted during business hours, with public access discontinued after businesses have closed. Facility operations would include staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. On-site security would include provision of camera surveillance, as needed, and a security program for ground level open space areas. Duties of the security personnel would include, but would not be limited to, assisting residents and visitors with site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property, including publicly accessible areas. The Project design would also include lighting of entryways, publicly accessible areas, and common building and open space areas

¹¹ 43,423 residents ÷ 309 sworn officers = one officer per 141 residents.

¹² 3,423 residents ÷ 129.8:1 residents/officer = 26 officers

associated with the residential units for security purposes. In addition, secure access points would be limited and located in areas of high visibility; outdoor areas would be exposed to windows to allow for natural surveillance; clear transitional zones would be provided between public, semi-public and private spaces; proper signage would be provided to direct the flow of people and decrease opportunities for crime; and hallways and corridors would be designed to minimize dark corners to the extent possible. The Project's numerous security features would be reviewed for further suggestions by the LAPD. These security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries, and would reduce demand for LAPD services.

As discussed in further detail in Section IV.1.1, *Public Services – Fire Protection*, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate emergency vehicle access. These same roads would be used by LAPD vehicles to access the Project Site. Compliance with applicable Los Angeles Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Direct emergency access would be provided to the North and South Sites along Central Avenue, 4th Street, and Alameda Street, and to the West Site from Central Avenue. As such, emergency access to the Project Site would be maintained at all times.

It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site 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 local Project vicinity. Emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to CVC Section 21806 and multiple station response. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

In consideration of the above, the Project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the Project and require construction of new police facilities. The LAPD letter provided in Appendix I-1 of this Final EIR states that, currently, there are no planned improvements to the Central Community police station for the service area and that there are no special police protection requirements needed by law enforcement because of specific attributes of the Project. The LAPD letter further states that the Project would not result in the need for new or altered police facilities.¹³ Finally, the protection of public

¹³ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's general funds. Accordingly, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate.¹⁴

Based on the above analysis, the Project would not generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Furthermore, the Project would not result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, 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, and impacts would be less than significant.

(2) Mitigation Measures

Impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 35 related projects that are anticipated to be developed in the Project vicinity, all of which would be located within the Central Community Station service area. The related projects include residential, office, commercial/retail/restaurant, and hotel uses that would generate population and demand on police services. As analyzed in Section IV.H, *Population and Housing*, of this Draft EIR, the related projects containing residential components would have the potential to generate a cumulative population increase of 17,245 people. The related projects, including the Project's estimated 3,423 residents, would generate a total of 20,668 residents.

As noted above, LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population as an overall police service population.

¹⁴ *City of Hayward v. Board of Trustees* (2015) 242 Cal. App. 4th 833.

(a) Construction Impacts

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each project's respective environmental review process conducted by the City. Similar to the Project, each related project would be required to ensure that adequate emergency access to the property and neighboring properties is maintained. Related projects would also be required to implement similar security measures as under the Project to limit access to construction areas, such as hiring private security, installing construction fencing, and including security lighting. The specific type and combination of construction site security features would depend on the phase and duration of construction. The related projects would need to coordinate emergency accessibility with LAPD and/or LADOT, as necessary, to their respective sites to ensure that emergency access would be maintained through temporary lane closures or marked emergency access points. Construction-related traffic generated by the Project and related projects would not adversely affect LAPD service in the Project vicinity as drivers of police and emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, the Project's contribution to cumulative impacts on police protection during construction would not be cumulatively considerable, and cumulative construction impacts would be less than significant.

(b) Operational Impacts

As indicated above, the residential component of the Project (3,423 residents) plus that of the related projects (17,245 residents) would increase the service population of LAPD's Central Area by an estimated 20,668 residents. As such, the total cumulative service population in LAPD's Central Division would be approximately 60,668 residents, compared to the current service population of approximately 40,000 residents.

The new residents generated by the Project and related projects would result in a resident to officer ratio of approximately 197:1¹⁵ in the Central Division, compared to the current resident to officer ratio of 129.8:1.¹⁶ This increase, however, would be well below the Citywide average of 423:1 resident to officer ratio. The cumulative population increase would likewise generate an increase in the number of Citywide crimes which, at a rate of 29.9 crimes per 1,000 residents, would increase by an estimated 618 crimes annually. Therefore, the Project, together with related projects would cumulatively generate increased demand for police protection services from the Central Community Station compared to existing conditions.

However, these are conservative estimates because the related projects' generated populations would not all be net new residents and non-residents (i.e., these population projections do not take into account existing development and the associated existing

¹⁵ The ratio of 197:1 is derived by dividing 60,668 residents by 308 officers (60,668 ÷ 308 = 197)

¹⁶ See Table IV.1.2-3 in this Section.

resident and non-resident populations to be removed due to the development of the related projects). Additionally, the projections do not account for related projects that may not proceed beyond the application phase or ultimately may not be built, may be or built at reduced densities. The projections also do not consider the reduction in criminal activity that is likely to occur as a result of development of the related projects, which include residential, office, commercial/retail/restaurant, and hotel uses as the related projects would seek to activate their frontages and increase the amount of activity around their respective sites. The commercial related projects, such as those with office, retail, and restaurant components, would also be expected to provide on-site security, personnel, and/or design features for their visitors and patrons. Similar to the Project, related projects with residential or a mix of uses use would also implement project design features such as a security camera network, controlled access to all building elevators, residences, and resident-only common areas through electronic access control; employees trained on appropriate security policies; a security program for open space areas; and well-lit interior and exterior spaces with proper signage to direct the flow of people and decrease opportunities for crime.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Central Division area. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and may include measures that would serve to reduce traffic congestion. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

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. Additionally, similar to the Project, the related projects would contribute revenue to the City's General fund, which may be used to fund LAPD expenditures as necessary to offset the cumulative incremental impact on police services. Through this process, LAPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project and related projects would contribute.

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate police protection services is the responsibility of the City. Through the City’s regular budgeting efforts, LAPD’s resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. According to the LAPD letter contained in Appendix I-2 of this Draft EIR, there are no current planned improvements to the Central Community police station for the service area. In addition, the LAPD letter states that the Project in combination with other past, present, or future projects will not result in the need for new or altered police facilities.¹⁷ If LAPD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are typically between 0.5 and one acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or be reviewed in a Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Based on the above, the Project’s contribution to cumulative operational impacts to police protection services would not be cumulatively considerable. The Project would not result in cumulative adverse impacts associated with the provision of new or physically altered government facilities (i.e., police), need for new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As, such, cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

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

¹⁷ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.