

## **IV. Environmental Impact Analysis**

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### **H.2 Public Services—Police Protection**

#### **1. Introduction**

This section analyzes whether new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated May 11, 2023, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix H of this Draft Environmental Impact Report. Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

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

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

- 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 incident/calls.<sup>1</sup> This section of the California Vehicle Code states the following:

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

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

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

<sup>1</sup> 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.

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.<sup>2</sup>

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.

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<sup>2</sup> County of Los Angeles Chief Executive Office, Office of Emergency Management, *About Emergency Management*, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed May 23, 2023.

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

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

The Project Site is located within the Central City North Community Plan area.<sup>3</sup> The Central City North Community Plan, adopted on December 15, 2000, and amended on September 7, 2016, includes the following objectives and policies that are relevant to police protection:

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<sup>3</sup> *The City of Los Angeles Department of City Planning updated the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (also known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. On May 3, 2023, the Los Angeles City Council voted unanimously to approve the DTLA 2040 Plan. Following City Council approval, the implementing ordinances will be reviewed and finalized by the City Attorney to ensure clarity of regulations and consistency with State law, a process which can occur over an approximate six-month to one-year period.*

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

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

- Objective 8-1: 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 land use changes to determine law enforcement needs and demands.
- Objective 8-2: Increase the community's and the Police Department's ability to minimize crime and provide adequate security.
- Policy 8-2.1: Support and encourage community based crime prevention efforts through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs, and regular communication with neighborhood and civic organizations.
- Policy 8-2.2: Ensure 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.

- Policy 8-2.4: Ensure that recreational facilities in multiple family residential complexes are designed to provide adequate visibility security.

*(b) City of Los Angeles Charter*

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

*(c) Administrative and Municipal Codes*

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

*(d) Los Angeles Police Department Computer Statistics Unit Program*

The LAPD Computer Statistics Unit (COMPSTAT) Program was created in 1994 and implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. The intent of COMPSTAT is to reduce the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.<sup>4</sup>

*(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

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<sup>4</sup> LAPD, COMPSTAT, [www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/](http://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/), accessed May 25, 2023.

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.”

## **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.<sup>5</sup> These four geographic bureaus are further divided into 21 geographic areas,

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<sup>5</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/lapd-organization-chart/](http://www.lapdonline.org/lapd-organization-chart/), accessed May 25, 2023.

which are serviced by the LAPD's 21 community police stations.<sup>6</sup> Each geographic bureau is comprised of four to five geographic areas/police stations.<sup>7</sup>

As of May 2023, the departmental staffing resources within the LAPD included 9,035 sworn officers.<sup>8</sup> Based on a total City population of approximately 3,985,516, the LAPD currently has an officer-to-resident ratio of approximately one officer for every 441 residents.<sup>9</sup>

The Project Site is located in the Central Bureau, which covers a territory of approximately 65 square miles with a population of approximately 842,700 residents.<sup>10</sup> The Central Bureau oversees operations in the Central, Hollenbeck, Newton, Northeast, and Rampart service areas.<sup>11</sup> The Central Bureau also oversees the Central Traffic Division.<sup>12</sup>

## (2) LAPD Community Police Station

Within the Central Bureau, the Project Site is located within the LAPD's Central Area and is served by the Central Community Police Station located at 251 East 6th Street, approximately 0.8 mile west of the Project Site. The location of the police station that serves the Project Site is depicted in Figure IV.H.2-1 on page IV.H.2-9. The Central Community Police Station service area covers approximately 4.5 square miles and consists of 48 Reporting Districts. LAPD's Central Bureau includes the downtown communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Artist Lofts, Olvera Street, the Financial District, the Jewelry District, the Convention Center, and the Fashion District.<sup>13</sup> As of May 2023, based on a four-week period between April 9, 2023 to May 6, 2023, the average police response time for emergency, high priority calls in the Central Area

<sup>6</sup> LAPD, LAPD Office of Operations, <https://www.lapdonline.org/office-of-the-chief-of-police/office-of-operations/>, accessed June 7, 2023.

<sup>7</sup> LAPD, LAPD Organization Chart, [www.lapdonline.org/lapd-organization-chart/](http://www.lapdonline.org/lapd-organization-chart/), accessed May 25, 2023.

<sup>8</sup> Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H of this Draft EIR.

<sup>9</sup> The City population referenced in this section is current as of October 1, 2021, according to 2010-2020 American Community Survey and the 2020 US Census for year 2020, consistent with the written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H of this Draft EIR.

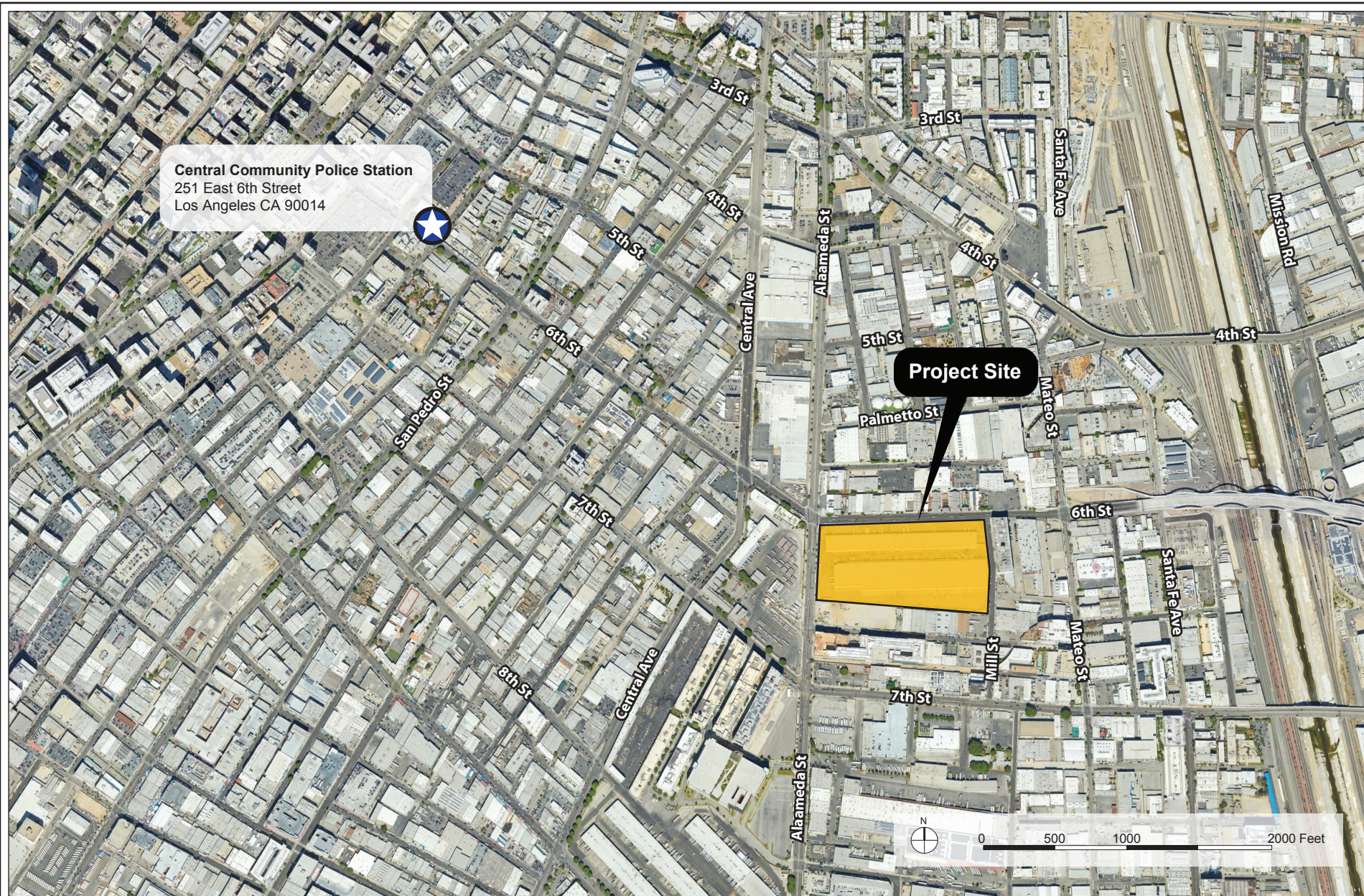
<sup>10</sup> LAPD, About Central Bureau, [www.lapdonline.org/lapd-contact/central-bureau/](http://www.lapdonline.org/lapd-contact/central-bureau/), accessed May 25, 2023.

<sup>11</sup> LAPD, About Central Bureau, [www.lapdonline.org/lapd-contact/central-bureau/](http://www.lapdonline.org/lapd-contact/central-bureau/), accessed May 23, 2023.

<sup>12</sup> LAPD, About Central Bureau, [www.lapdonline.org/lapd-contact/central-bureau/](http://www.lapdonline.org/lapd-contact/central-bureau/), accessed May 25, 2023.

<sup>13</sup> LAPD, About Central Bureau, [www.lapdonline.org/lapd-contact/central-bureau/](http://www.lapdonline.org/lapd-contact/central-bureau/), accessed May 25, 2023.





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



was 3.5 minutes; 15.6 minutes for medium high priority calls; and 37.5 minutes for non-emergency calls.<sup>14</sup>

The Central Community Police Station serves a population of approximately 40,000 residents and is staffed by approximately 345 sworn officers and 17 civilian support staff. Based on the police service population of 40,000 residents and approximately 345 sworn officers, the officer-to-resident ratio of the Central Community Police Station is approximately one officer for every 115 residents. As such, the officer-to-resident ratio is higher than the citywide ratio of one officer for every 441 residents.

### 3. Project Impacts

#### a. Thresholds of Significance

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

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

For this analysis, the Appendix G Threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold question.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to police protection services:

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

<sup>14</sup> Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H of this Draft EIR.

- Whether the project includes security and/or design features that would reduce the demand for police services.

## b. Methodology

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

The need for or deficiency in adequate police protection in and of itself is not a CEQA impact but, rather, a social and/or economic impact. Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in that project's CEQA document. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

## c. Project Design Features

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

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

**Project Design Feature POL-PDF-2:** During operation, the Project will incorporate a 24/7 security plan to ensure the safety of its employees and visitors. The Project's security plan will include, but will not be limited to, the following design features:

- Secured points of entry, involving the use of key card passes and other pedestrian and vehicular access controls, where not manned;
- A 24-hour security camera network to provide visual surveillance of outdoor areas, parking facilities, and other activity areas, such as the lounges and auditorium;
- Private on-site security staff and regular security patrols of the Project Site; and
- Appropriate staff training on security protocols, including site and building access control and managing and monitoring fire/life/safety systems.

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

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

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

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

## d. Analysis of Project Impacts

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

### (1) Impact Analysis

#### (a) Construction

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Central Community

Police Station since the daytime population generated at the Project Site during construction would be temporary in nature. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, as under existing conditions. Therefore, Project construction would not contribute to an increased demand for police protection services, and impacts would be less than significant. In addition, pursuant to Project Design Feature POL-PDF-1 listed above, the Applicant would also implement temporary security measures during construction, including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be further reduced.

Project construction activities could also potentially affect LAPD police protection services within the Central Area by adding construction traffic to the street network and by necessitating partial lane closures for installation of required utility and street improvements. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would not be impeded. Therefore, impacts related to emergency access during Project construction would be less than significant. In addition, as discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access is available within and near the Project Site during construction activities. Additionally, given standard construction industry working hours, it is anticipated that the majority of construction-related traffic, including hauling activities would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. As part of the Construction Traffic Management Plan, appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response to the Project Site and vicinity as emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

**Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Therefore, impacts with respect to police protection services during Project construction would be less than significant.**

*(b) Operation*

As discussed in Section II, Project Description, of this Draft EIR, the Project includes the development of a new production studio campus. The Project would introduce a new employee and visitor population to the Project Site and increase the police service population of the Central Area/Central Community Police Station. However, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the Central Area. In addition, the employment opportunities that would be generated by the Project would include a range of full-time and part-time positions, which may be filled, in part, by employees already residing in the vicinity of the Project Site and who are already included in the residential population of the Central Area. Other positions may be filled by persons who would commute and who would not relocate their place of residence as a result of working on the Project Site. Overall, given the LAPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio for the Central Area.

Given that the Project would not affect the officer-to-resident ratio for the Central Area, the Project would not result in a need to construct any new police facilities or modify any existing facilities, and impacts would be less than significant. Additionally, as provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. In addition to these project design features, it is noted that as a production studio campus the Project in and of itself would enhance security within the Project Site and surrounding area compared to existing conditions through the development of a closed studio campus with guarded entries where access would need to be granted prior to entering the Project Site, consistent with other production studios in the City. Also, as set forth in Project Design Feature POL-PDF-2, the Project would include a 24/7 security plan to ensure the safety of its employees and site visitors. This security plan will include secured entry points, a 24 hour security camera network, private on-site security staff, and appropriate staff training on security protocols. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of the buildings, walkways, and parking areas to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the buildings. The Project would also design entrances to and exits from the buildings and open spaces around the building to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site to the LAPD showing access routes and other information that might facilitate police response.

In addition to the implementation of the above project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, etc.) that

could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police protection services. Overall, as concluded in the written correspondence from LAPD, there are currently no planned improvements to the Central Area Community Police Station and/or its protection facilities. Additionally, LAPD concluded that at this time there are no special police protection requirements needed by law enforcement because of the specific attributes of the Project. Lastly, LAPD determined that the Project, individually, or combined with other past or present projects, would not result in the need for new or altered police facilities.<sup>15</sup>

The Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. 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 have the ability of circulating around traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. As discussed in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, to the Project Site would be provided from two large, gated driveways along 6th Street (referred to as the West Gate and the East Gate), and two additional driveways on Mill Street. An Emergency Vehicle only access driveway would also be located at Alameda Street along the south perimeter of the Project Site, exiting at Mill Street. The Project's driveways and internal circulation would be designed to meet all applicable Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Additionally, operation of the Project would not include the installation of barriers in the vicinity of the Project Site (e.g., fixed bollards, etc.) that could impede emergency access in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Moreover, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need

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<sup>15</sup> Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H of this Draft EIR.

for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

**Based on the above analysis, Project operation would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Therefore, impacts with regard to police protection services would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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

# e. Cumulative Impacts

## (1) Impact Analysis

Cumulative growth in the greater Project area through 2026 (the Project's anticipated buildout year) includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, there are 21 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project No. 1 through 21 is a conservative assumption, as some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City and is part of the Central City North Community Plan update, known as the DTLA 2040 Plan. To provide a conservative forecast, the future baseline forecast assumes that Related Project No. 1 through 21 are fully built out by 2026.

### *(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 related



projects in the immediate vicinity of the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan (Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR), as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each related project would implement similar design features during construction and 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. Furthermore, the Project vicinity and general Central City North Community Plan area are urbanized areas, with services provided by various existing police stations in the area. Furthermore, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD access within the Project Site vicinity as drivers of police 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. 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 impacts on police protection services during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(b) Operation*

As shown in Table IV.H.2-2 on page IV.H.2-18, it is estimated that the related projects would result in a total police service population of approximately 21,435 persons, including both residents (permanent population) and employees (daytime population). When considering only residential population, the related projects are estimated to generate 7,393 new residents. The Project does not include residential uses and would not add to this additional estimated residential population from the related projects. With the additional residential population associated with the related projects, the Central Area police service population would increase from approximately 40,000 residents to 47,393 residents, which would decrease the officer-to-resident ratio from the current ratio of one officer per 115 residents whether or not the Project is implemented.

While the Project and the related projects would increase the demand for LAPD services and facilities, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-6, which together would ensure that Project demand for LAPD services/facilities is minimized. In addition, replacing the existing uses with a closed production studio campus would enhance security within the Project Site. Similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes review by the LAPD to ensure 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 discussed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional

**Table IV.H.2-2  
Estimated Service Population from Related Projects**

<b>No.</b>	<b>Project Location</b>	<b>Land Use</b>	<b>Size</b>	<b>Population Rate<sup>a</sup></b>	<b>Service Population</b>
1	1525 E. Industrial St.	Mixed/Use	336,304 sf	0.004	1,345
		Live/Work	334 du	2.25	752
		Leasing/Amenity Area	7,458 sf	0.002	15
		Creative Office Uses	24,744 sf	0.004	99
		Restaurant	4,042 sf	0.004	16
2	1340 E. 6th St.	Apartments	170 du	2.25	383
		Retail	16,518 sf	0.002	33
3	668 S. Alameda St.	Live/Work	475 du	2.25	1,069
		Grocery Store	15,105 sf	0.004	60
		Retail and Studio Space	27,063 sf	0.002	54
		Restaurant	27,063 sf	0.004	108
		Gallery	700 sf	0.002	1
4	527 S. Colyton St.	Live/Work	475 du	2.25	1,069
		Retail/Restaurant	12,396 sf	0.002	25
		Leasable Arts/Production Space	12,396 sf	0.004	50
		Production Space	512 sf	0.004	2
5	1800 E. 7th St.	Residential	122 du	2.25	275
		Commercial	9,500 sf	0.002	19
		Amenity Space	5,885 sf	0.002	12
6	1100 E. 5th St.	Live/Work (11% Very Low Income)	220 du	3.14	691
		Open Space	22,725 sf	0.002	45
7	676 S. Mateo St.	Live Work	159 du	2.25	358
		Commercial	45,873 sf	0.002	92
8	520 S. Mateo St.	Live/Work	475 du	2.25	1,069
		Restaurant	10,000 sf	0.004	40
		Retail	10,000 sf	0.002	20
		Office	105,000 sf	0.004	420
9	1129 & 1101 E. 5th St., 445–457 S. Colyton St., 450–456 S. Seaton St.	Live/Work Condominiums	129 du	3.14	405
		Hotel	113 rm	0.5	57
		Commercial	81,326 sf	0.002	163
10	400 S. Alameda St.	Hotel	66 rm	0.5	33
		Restaurant	3,800 sf	0.004	15
		Specialty Retail	840 sf	0.002	2
		Screening Room	890 sf	0.004	4
11	2053 E. 7th St.	Hotel	103 rm	0.5	52
12	655 S. Mesquit St.	Office	188,954 sf	0.004	756
		Commercial	4,325 sf	0.002	9

**Table IV.H.2-2 (Continued)**  
**Estimated Service Population from Related Projects**

No.	Project Location	Land Use	Size	Population Rate <sup>a</sup>	Service Population
13	405 S. Hewitt St.	Commercial Office	311,682 sf	0.004	1,247
		Ground Floor Restaurant	8,149 sf	0.004	33
		Museum	7,800 sf	0.002	16
14	656 S. Stanford Ave.	Apartments	82 du	2.25	185
15	670 S. Mesquit St.	Hotel	236 rm	0.5	118
		Multi-Family Residential Housing	208 du	2.25	468
		Arts District Central Market (food hall)/ Grocery/Retail	136,152 sf	0.004	545
		Restaurant	89,577 sf	0.004	358
		Studio/Event/Gallery Space/Museum	93,617 sf	0.004	374
		Gym	62,148 sf	0.001	62
16	719 E. 5th St.	Re-Establish Hotel	42 rm	0.5	21
17	713 E. 5th St.	Apartments	51 du	2.25	115
18	1000 S. Mateo St.	Live/Work	106 du	2.25	239
		Commercial Space	119,845 sf	0.002	240
19	2000 E. 8th St.	Film Production Studio	832,750 sf	0.004	3,331
20	400 S. Central Ave.	Hotel	68 rm	0.5	34
		Office	411,113 sf	0.004	1,644
		Commercial Retail and Restaurant	101,088 sf	0.002	202
21	2045 E. Violet St.	Office	435,100 sf	0.004	1,740
		Office (Future Expansion Phase)	211,201 sf	0.004	845
Related Projects Service Population					21,435
Project Service Population					2,461
Total Service Population for Related Projects and Project					23,896
Related Projects Residential Service Population					7,393
Project Residential Service Population					0
Total Residential Service Population for Related Projects and Project					7,393
<hr/>					
du = dwelling units					
rm = rooms					
sf = square feet					
<sup>a</sup> LADOT and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.					
Source: Eyestone Environmental, 2024.					

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. 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 revenue, etc.) that could be applied by the City toward the provision of new facilities and related staffing, as deemed appropriate by the City. LAPD also concluded that the Project, individually, or combined with other past or present projects, would not result in the need for new or altered police facilities.<sup>16</sup>

With regard to police emergency access, the Project, related projects, and other future development within the Central Area would introduce new uses that would generate additional traffic in the vicinity. As previously discussed, the Project is not anticipated to substantially affect existing emergency response in the Central Area, and the Project would not contribute to a cumulative impact regarding emergency response. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with CVC Section 21806.

Lastly, 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.<sup>17</sup> 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. At this time, LAPD has not identified that it will be constructing a new station in the area and has concluded that the Project "individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities."<sup>18</sup> 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 likely be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or be reviewed in a 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.

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<sup>16</sup> Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix H of this Draft EIR.

<sup>17</sup> (2015) 242 Cal.App.4th 833.

<sup>18</sup> Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, May 11, 2023. See Appendix H of this Draft EIR.

**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 governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, cumulative impacts on police protection services would be less than significant.**

## **(2) Mitigation Measures**

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

## **(3) Level of Significance After Mitigation**

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