

IV. Environmental Impact Analysis

F.1 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 September 11, 2024, 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 (EIR). Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs 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;
 - South Los Angeles Community Plan;
- City of Los Angeles Charter;
- Administrative and Municipal Codes;
- Los Angeles Police Department Computer Statistics Unit (COMPSTAT) 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. ¹This 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 on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates 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 (*City of Hayward*), the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²

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.

² (2015) 242 Cal. App. 4th 833.

(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 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.³

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 (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision or strategy 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.⁴

Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.F.1-1, Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies, below. Specifically, Chapter 9 (Infrastructure and Public Services) of the General Plan Framework addresses infrastructure and public services, and includes the following relevant goals, objectives, and policies outlined below. 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

³ County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed October 14, 2025.

⁴ City of Los Angeles Planning Department, The Citywide General Plan Framework, <https://planning.lacity.gov/plans/policies/framework-element>, accessed August 10, 2025.

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.F.1-1: Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies

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

(ii) South Los Angeles Community Plan

The Land Use Element of the City’s General Plan is comprised of 34 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 the 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 boundaries of the South Los Angeles Community Plan. The South Los Angeles Community Plan, last updated in November 2017, contains the following goals and policies related to police protection applicable to the Project:⁵

⁵ Los Angeles Department of City Planning, South Los Angeles Community Plan, <https://planning.lacity.gov/plans-policies/community-plan-area/south-los-angeles>, accessed November 17, 2025.

Goal CF1: Sufficient police facilities and services to provide for public safety needs.

Policy CF1.1: Neighborhood Level Police Protection. Maintain and promote the establishment of police facilities and services adequate to protect the South Los Angeles Community Plan Area at the neighborhood level.

Goal CF2: A safe and secure environment where walkability is increased.

Policy CF2.1: Illumination for Security. Provide adequate low-level lighting to improve security around residential, commercial and industrial buildings, as well as parks, schools and recreational areas.

(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 Code

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 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.⁶

(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

⁶ LAPD, COMPSTAT, <https://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/>, accessed October 14, 2025.

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 Areas and Bureaus

The LAPD provides protection services in the City of Los Angeles, covering approximately 468 square miles and includes 21 community police service areas across four geographically defined bureaus: the Central, South, West, and Valley Bureaus.⁷ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD’s 21 community police stations.⁸ Each geographic bureau is comprised of four to five geographic areas/police stations.⁹

As of September 2024, the department staffing within the Los Angeles Police Department included 8,788 sworn personnel and 3,092 civilian employees.¹⁰ Based on a total City population of 3,985,516, the LAPD currently has an officer-to-resident ratio of one officer for every 453 residents.

⁷ LAPD, LAPD Organization Chart, www.lapdonline.org/lapd-organization-chart/, accessed October 15, 2025.

⁸ LAPD, LAPD Organization Chart, www.lapdonline.org/lapd-organization-chart/, accessed October 15, 2025.

⁹ LAPD, Your LAPD by Bureau, Division and Community, www.lapdonline.org/find-your-local-police-station/, accessed October 15, 2025.

¹⁰ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

The Project Site is located in the South Bureau, which covers a territory of approximately 58 square miles with a population of approximately 640,000 residents.¹¹ The South Bureau oversees operations in the Southwest, Harbor, 77th Street, and Southeast areas.¹² The South Bureau also oversees the South Traffic Division and South Bureau Homicide Division.¹³

(2) LAPD Southwest Police Station

The Project Site is served by LAPD's Southwest Community Police Station, located at 1546 West Martin Luther King Jr Boulevard, approximately 1.3 miles west of the Project Site. The Southwest Community Police Station's geographical area of patrol is approximately 13.11 square miles. The Southwest Community Police Station consists of approximately 50 Reporting Districts.¹⁴ The Project Site is located within reporting district (RD) 0359, which is bounded by South Figueroa Street to the west, Exposition Boulevard to the north, Interstate 110 (Harbor Freeway) to the east, and Martin Luther King Boulevard to the south.

According to LAPD correspondence dated September 11, 2024, the Southwest Division includes a service population of approximately 165,000 people, and is staffed by approximately 306 sworn personnel and 14 civilian support staff. As such, the Southwest Division officer to resident ratio is approximately 1 officer for every 720 residents, which is lower than the citywide ratio of 1 officer per 453 residents.¹⁵

According to the LAPD, based on a 4-week period between July 28, 2024, and August 24, 2024, the Southwest Police Station average response time for high priority calls was 4.2 minutes. Average response times for medium-high priority calls and low priority calls were 16.2 minutes and 29.0 minutes, respectively.¹⁶ Response times for the Southwest Police Station are typically faster than the Citywide response times, which were an average of 4.4 minutes for high priority calls, 17.2 minutes for medium-high priority calls, and 32.2 minutes for low priority calls.¹⁷

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, the 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 (i.e., police), need for new or physically altered governmental facilities, the construction

¹¹ LAPD, South Bureau, <https://www.lapdonline.org/lapd-contact/south-bureau/>, accessed October 15, 2025.

¹² LAPD, South Bureau, <https://www.lapdonline.org/lapd-contact/south-bureau/>, accessed October 15, 2025.

¹³ LAPD, South Bureau, <https://www.lapdonline.org/lapd-contact/south-bureau/>, accessed October 15, 2025.

¹⁴ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

¹⁵ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

¹⁶ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

¹⁷ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

This analysis 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 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to police protection services:

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

b. Methodology

According to the City's 2006 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 the 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 one 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 (PDFs) are proposed with regard to police services:

Project Design Feature POL-PDF-1: During construction, the Project shall implement temporary security measures, including security fencing, lighting, and locked entry. The Project Site would be monitored via surveillance cameras, security on-site, or security drive-by patrols depending on the stage of construction to monitor the Project Site during nighttime hours.

Project Design Feature POL-PDF-2: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-3: Prior to the issuance of a building permit, the Project Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of features that are appropriate for the design of the Project, including applicable features in LAPD's "Design Out Crime" Guidelines.

Project Design Feature POL-PDF-4: 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 Southwest Community Police Station's 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 Impacts

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Southwest Community Police Station. The existing multi-family residential uses on the Project Site currently generate a police service population that requires police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of the existing uses, which would reduce the police service population on the Project Site. Furthermore, the population at the Project Site during construction would be temporary in nature, and therefore impacts on police protection services would be less than significant. Notwithstanding, construction sites may still be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to **Project Design Feature POL-PDF-1**, the Project would implement temporary security

measures, including security fencing, lighting, and locked entry during construction. The Project Site would be monitored via surveillance cameras, security on-site, or security drive-by patrols depending on the stage of construction to monitor the Project Site during nighttime. Implementation of these security measures would further reduce the Project's potential demand on police protection services at the Project Site. Therefore, Project construction would not contribute to an increased demand for police protection services. Project construction activities could also potentially impact LAPD police protection services and emergency response within the service area of the Southwest Division due to construction impacts on the surrounding roadways. As discussed in Section IV.G, Transportation of this Draft EIR, during construction, traffic on South Figueroa Street and South Flower Drive could be intermittently disrupted due to vehicle loading and unloading, and intermittent travel lane closures may disrupt local traffic. However, a Construction Traffic Management Plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT) pursuant to **Project Design Feature TRAF-PDF-1**, to implement temporary security measures including limiting potential lane closures to off-peak travel periods and scheduling delivery of construction materials to non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be implemented to ensure emergency access to the Project Site and traffic flow is maintained on adjacent roadways. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the vicinity of the Project Site as emergency vehicles are generally able 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. Therefore, 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. As such, impacts related to emergency access during Project construction would be less than significant.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the 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 would include the demolition of 51 existing residential units and the development of 209 new residential units. Therefore, the net number of new units on the Project Site would be 158 units. When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area¹⁸ which is higher than the City's average household size of 2.70, the Project's net 158 proposed units would result in a population increase of 529 residents.¹⁹

¹⁸ Los Angeles Department of City Planning, South Los Angeles Demographic Profile, https://planning.lacity.gov/odocument/a547cb71-0d86-47d3-9717-d6059dea27e0/standard_report2022_SOUTH_LA_mail.pdf, accessed January 2026.

¹⁹ 3.35 residents per household x 159 households = 529 residents.

As discussed above, the Project Site is served by the Southwest Community Police Station located approximately 1.3 miles west of the Project Site. The Southwest Community Police Station staffing consists of two captains, five lieutenants, 37 detectives, 25 sergeants, and 227 police officers.²⁰

The residential population in the service area of the Southwest Division is estimated at 165,000 people. According to the LAPD, the officer to resident ratio is approximately one officer for every 720 residents in the Southwest Division.²¹ When utilizing the average household size of 3.35 for the South Los Angeles Community Plan, the Project's net 158 proposed units would result in a population increase of approximately 529 residents. The residential service population of 529 residents would increase the existing police service population in the Southwest Division from 165,000 persons to 165,529 persons, which would decrease the officer-to-resident ratio from the current ratio of 1 officer per 727 residents to 1 officer per 729 residents.²² As provided above in Project Design Features POL-PDF-2 through POL-PDF-4, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include proper lighting of the buildings, walkways, and parking areas to maximize visibility and provide for pedestrian orientation. Furthermore, as specified in Project Design Feature POL-PDF-3, the Project Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of features appropriate for the design of the Project, including applicable features in LAPD's "Design Out Crime" Guidelines. Per Project Design Feature POL-PDF-4, 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's Southwest Community Police Station's Commanding Officer that includes access routes and any additional 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, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. As such, the Project would help offset any related increase in demand for police protection services.

LAPD also states the following conclusions in its February 5, 2024, correspondence regarding the police protection impacts of the Project:

"There are current plans for improvements to the Southwest Area Community Police Station and or it's protection facilities currently. These planned project improvements and or non-planned improvements are intended only for the service areas of the '3800 South Figueroa Project' site.

²⁰ Written Correspondence from *Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator*, September 11, 2024.

²¹ The officer to resident ratio of 1 officer for every 720 residents is provided by the LAPD in the written correspondence dated September 11, 2024. It should be noted that based on the 227 police officers and 165,000 residential population in the Southwest Division, the officer to resident ratio would be approximately 1 officer for every 727 residents (727:1).

²² This ratio is calculated based on 165,529 persons divided by the same 227 police officers, resulting in an officer to resident ratio of approximately 1 officer for every 729 residents (729:1).

Additionally, at this time, there are no special police protection requirements needed by law enforcement because of the specific attributes of the 3800 South Figueroa Project site.

The 3800 South Figueroa, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities.”

Overall, as concluded in the written correspondence from LAPD, the project will not result in the need for new or improved police facilities.²³

The Project would introduce new commercial uses and increased residential 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, pursuant to CVC Section 21806, the drivers of police emergency vehicles have the ability of maneuvering around traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. 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, would be provided by a new driveway with access along South Flower Drive providing ingress and egress into the wrapped at-grade parking garage.

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., perimeter fencing, 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 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

²³ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

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 2029 (the Project's anticipated buildout year) includes specific, known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, a total of seven related projects are located in the vicinity of the Project Site, of which three contain residential uses. The projected growth reflected by Related Projects No. 1 through 7 is a conservative assumption, as some of the related projects may not be built out by 2029, may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, however, the future baseline forecast assumes that Related Project Nos. 1 through 24 are fully built out by 2029.

(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 related project's development review process conducted by the City. Should Project construction occur concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan pursuant to **Project Design Feature TRAF-PDF-1**, 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 during construction.

Furthermore, the Project Site vicinity and general South Los Angeles Community Plan area are urbanized areas, where several police stations are available to serve the Project Site and related project sites. 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 circulate around traffic by using sirens to clear a path of travel or by 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

The Project would include the demolition of 51 existing residential units and the development of 209 new residential units. Therefore, the net number of new units on the Project Site would be 158 units. When utilizing the average household size of 3.35 for the South Los Angeles Community Plan area, the Project's net 158 proposed units would result in a population increase of approximately 529 residents.

Table IV.F.1-2: Estimated Service Population from Related Projects

No.	Project Name/Location	Land Use	Area/Unit	Population/ Employee Generation Factors ^a	Population
1	California African American Museum Expansion 600 South State Drive	Museum	26,400 sf existing and 77,100 sf new construction	n/a	n/a
2	USC University Park Master Plan 929 West Jefferson Boulevard	Park	n/a	n/a	n/a
3	Lucas Museum of Narrative Art 3800 South Vermont Avenue	Museum	325,000 sf	n/a	n/a
4	Natural History Museum of LA County 900 West Exposition Boulevard	Museum	130,000 sf	n/a	n/a
5	Mixed-Use Project 3801 South Grand Avenue	Residential	36 du, including four affordable	3.35	134
		Retail	1,768 sf	2/1000 sf	4
6	3900 South Figueroa Mixed-Use Project (i.e., Fig Project) 3900 South Figueroa Street	Residential	435 du, including 87 affordable	3.35	1,457
		Retail	23,670 sf	2/1000 sf	47
7	Mixed-Use Project 3851 South Grand Avenue	Residential	12 du, including one affordable	3.35	40
		Retail	723 sf	2/1000 sf	2
Total Related Project Employment + Residential Population					1,684
Total Related Projects plus Project					2,213
sf = square feet du = dwelling units ^a Population and employment generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1 and the average household size of 3.35 for the South Los Angeles Community Plan area. Source: Kimley-Horn, 2025.					

As shown in **Table IV.F.1-2, Estimated Service Population from Related Projects**, based on the household size factor of 3.35 persons per household, the residential component of the related projects would generate approximately 1,618 residents. The Project would contribute to this cumulative increase by generating a service population of approximately 529 residents. As such, the 1,618 residents generated by the related projects plus the Project's 529 residents would result in an estimated increase of 2,147 residents in the Southwest Division. It is noted that the estimated number of residents associated with the related projects is conservative because the estimates do not account for the removal of existing uses and their associated existing resident and employee populations resulting from the development of the related projects. When considering these estimates, the Southwest Division police service population would increase from 165,000 residents to 167,147 residents with both the Project and the related projects.

Notwithstanding, as the Project Site vicinity and general South Los Angeles Community Plan area are located within an urbanized area, it is assumed that each of the related projects identified, as well as other future development within the South Los Angeles Community Plan area would be serviced by one or more existing police stations. In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the General Plan Framework, as listed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the related projects would incorporate project design features similar to the Project, which would reduce cumulative demand for police protection services. Furthermore, the Project and the related projects would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

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-4**, which together would minimize Project demand for LAPD services. Lastly, LAPD 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.²⁴ Therefore the Project's incremental impact on police protection services would not be cumulatively considerable.

With regard to police emergency response, the Project, related projects, and other future development within the South Los Angeles Community Plan area would introduce new uses that would generate additional traffic in the vicinity of the Project Site. As discussed above, however, the Project is not anticipated to substantially affect existing emergency response times in the

²⁴ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.

Southwest Division, and therefore would not contribute to a cumulative impact regarding emergency response. Furthermore, as discussed above, in accordance with CVC Section 21806, drivers of emergency vehicles normally have several options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Finally, with regard to cumulative impacts on police protection, consistent with 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. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possible station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, the LAPD has stated that there are current plans for improvements to the Southwest Community Police Station and its service 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."²⁵ As such, cumulative impacts on police protection services would be less than significant.

Based on the above, the Project 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. As such, Project impacts on police protection facilities would not be cumulatively considerable and, therefore, the Project's cumulative impacts 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.

²⁵ Written Correspondence from Commander Gisselle Espinoza, Los Angeles Police Department, Department Homeless Coordinator, September 11, 2024.