

IV. Environmental Impact Analysis

I.2 Public Services—Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services in the vicinity of the Project Site and provides an analysis of the Project's potential impacts to these services. The focus of the analysis is the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site and the ability of the LAPD to provide adequate police protection services to serve the Project. This section is based in part on information provided by the LAPD's Community Relationship Division, which is included in Appendix I of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding police protection in the state as well as the City of Los Angeles. There are no federal regulations regarding police protections.

(1) State

(a) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution 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." 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 used exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire 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 fire protection, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University*

(2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public safety services are provided.¹

(b) California Vehicle Code

Section 21806 of the California Vehicle Code pertains to emergency vehicles responding to Code 3 incidents/calls.² 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.

(2) Local

(a) Los Angeles General Plan

The City of Los Angeles (City) General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines citywide policies regarding land use, including infrastructure and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Framework Element specifies that every

¹ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847

² 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.

neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.³ Objective 9.13 and Policy 9.13.1 require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future police protection needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet such needs. Further, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance agreements with other local law enforcement agencies, state law enforcement agencies, and the National Guard. In addition to the Framework Element, the City's General Plan Safety Element recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies.

Presently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT Plus is based on the COMPSTAT program that was created in 1994 by then-Police Commissioner of the New York Police Department and former LAPD Chief William J. Bratton. With its specialized crime control model, the COMPSTAT system implements a multi-layer approach to police protection services through statistical and geographical information system analysis of trends in crime. Under COMPSTAT, Part 1 Crimes were reduced by approximately 4 percent in 2003 (homicides were reduced by approximately 21 percent during this period, when compared to 2002).^{4,5,6} For the four-week period after implementation of COMPSTAT Plus in the LAPD's Southeast Area in 2004, violent crimes were down 11 percent.⁷

(b) The City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter, Article V, Section 570; the City of Los Angeles Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2.

³ *The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services.*

⁴ *Part 1 crimes include murder and non-negligent homicide, forcible rape, robbery, aggravated assault, burglary, motor vehicle theft, larceny-theft, and arson. See U.S. Department of Justice Federal Bureau of Investigation, Uniform Crime Reporting (UCR) Statistics, UCR Offense Definitions, www.ucrdatatool.gov/offenses.cfm, accessed August 4, 2017.*

⁵ *William J. Bratton and Sean W. Malinowski, Police Performance Management in Practice: Taking COMPSTAT to the Next Level, 2008.*

⁶ *LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed August 4, 2017.*

⁷ *Ibid.*

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

(c) Palms–Mar Vista–Del Rey Community Plan

The Palms–Mar Vista–Del Rey Community Plan describes specific goals and policies related to police protections services and public safety. Policies and objectives relevant to the Project are as follows:

- Objective 8-1: Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
 - Policy 8-1.1: Review with the Police Department proposals for new development projects and land use changes to determine law enforcement needs and requirements.
- Objective 8-2: Increase the community's and the Police Department's ability to minimize crime and provide security for all residents.
 - 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 adequate lighting around residential, especially multi-family commercial and industrial buildings to improve security.
 - Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.

b. Existing Conditions

(1) LAPD Service Area and Bureaus

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley Bureau.⁸ These four geographic bureaus are further divided into 21 geographic areas,

⁸ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed August 4, 2017.

which are serviced by the LAPD's 21 community police stations.⁹ Each geographic bureau is comprised of four to five geographic areas/police stations.¹⁰

As of August 2017, the departmental staffing resources within the LAPD included 9,973 sworn officers. Based on a total City population of 3,962,726, the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.¹¹

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,000 residents.¹² The West Bureau oversees operations in Hollywood, Wilshire, Pacific, and West Los Angeles service areas as well as the West Traffic Division. The West Bureau includes the communities of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.¹³

(2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within the Pacific Area and is served by the Pacific Community Police Station. As shown in Figure IV.I.2-1 on page IV.I.2-6, the Pacific Community Police Station is located at 12312 Culver Boulevard, approximately 1.5 miles northeast of the Project Site. The Pacific Community Police Station service area covers approximately 25.7 square miles and is bounded by the Santa Monica Freeway to the north, the San Diego Freeway to the east, Century Boulevard to the south, and the Pacific Ocean to the west. The service area excludes Los Angeles International Airport.¹⁴

The Pacific Community Police Station serves a population of approximately 200,000 persons and is staffed by approximately 360 sworn officers and 30 civilian support staff. The average response time for emergency and non-emergency calls in the Pacific

⁹ LAPD, *Community Police Station Address Directory*, www.lapdonline.org/our_communities/content_basic_view/6279, accessed August 7, 2017.

¹⁰ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed July 20, 2017.

¹¹ LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 06/25/17–07/22/17*.

¹² LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed August 7, 2017.

¹³ *Ibid.*

¹⁴ Written correspondence from Christopher Gibson, Community Relationship Division, Los Angeles Police Department, June 29, 2017. See Appendix I of this Draft EIR.

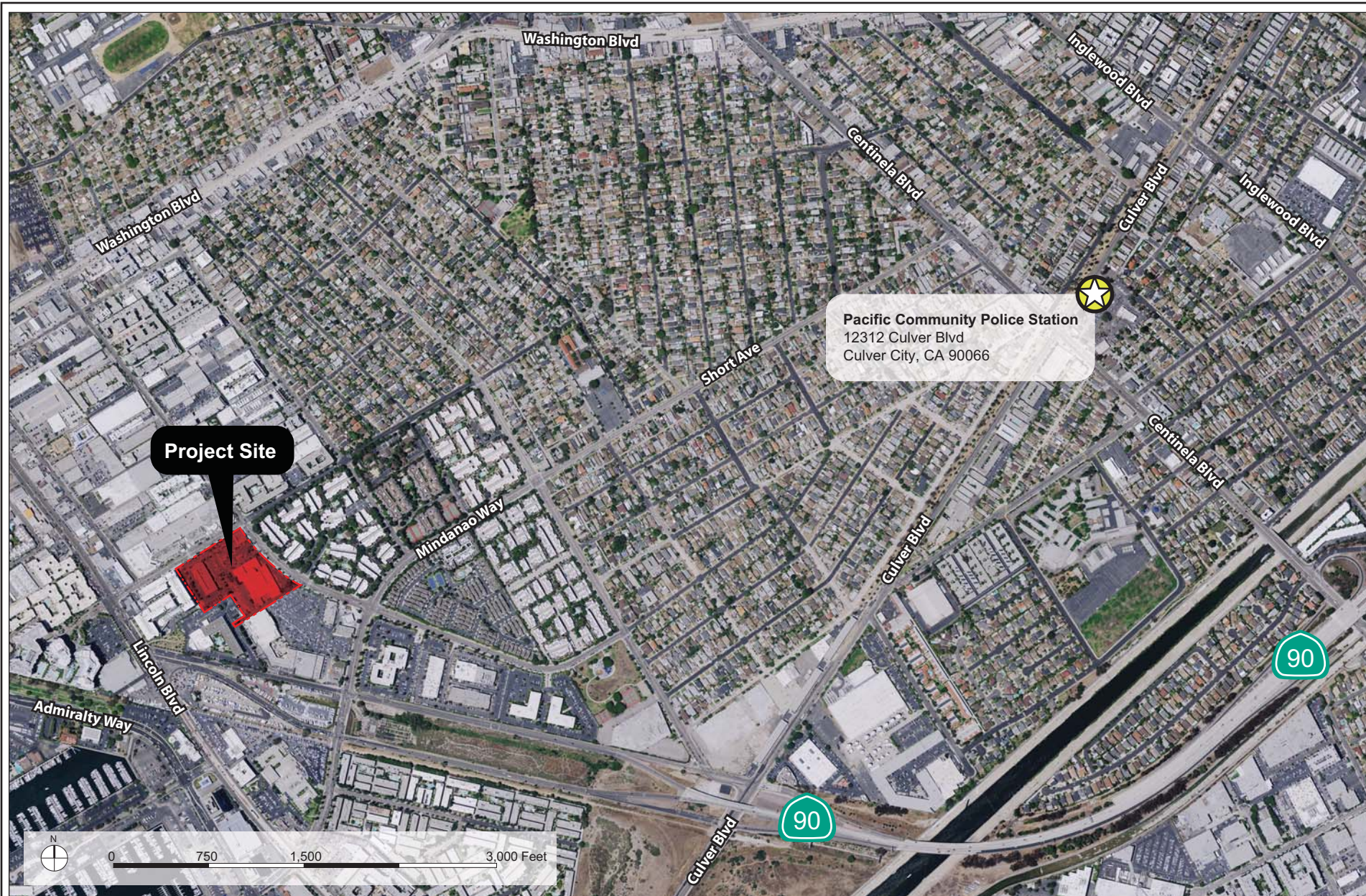


Figure IV.I.2-1
Police Station Serving the Project Site

Area in 2016 was 4.4 and 23.4 minutes, respectively.¹⁵ Based on the police service population of 200,000 persons, the officer-to-resident ratio is approximately 1.8 officers per 1,000 residents. As such, the officer-to-resident ratio in the Pacific Area is lower than the citywide ratio of 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.I.2-1 below shows a comparison of the Pacific Area and citywide data regarding crimes. As shown therein, based on the most recent data available year to date for 2017, approximately 3,812 crimes were reported within the Pacific Area and 70,409 crimes were reported citywide.¹⁶ Based on the service population of the Pacific Community Police Station, approximately 19 crimes per 1,000 residents (0.019 crime per capita) were reported in the Pacific Area and 18 crimes per 1,000 residents (0.018 crime per capita) were experienced citywide.

Based on the number of sworn officers staffing the Pacific Community Police Station (360 sworn officers), the current 2017 ratio of crimes per officer is 10.6 crimes per officer in comparison to a 2017 citywide ratio of 7.1 crimes per officer (9,973 sworn officers citywide). Thus, the Pacific Area has a higher crime per officer ratio compared to the citywide ratio.

Table IV.I.2-1
2017 YTD Crimes—Pacific Area and Citywide

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Pacific Area	3,812	200,000	19/1000	0.019
Citywide	70,409	3,962,726	18/1,000	0.018
<p><i>Source: LAPD, COMPSTAT Unit, COMPSTAT Pacific Area Profile 06/25/17–07/22/17, accessed August 7, 2017. LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 06/25/17–07/22/17, accessed August 7, 2017.</i></p>				

¹⁵ Written correspondence from Christopher Gibson, Community Relationship Division, Los Angeles Police Department, June 29, 2017. See Appendix I of this Draft EIR.

¹⁶ LAPD, COMPASTAT Unit, COMPSTAT Pacific Area Profile 06/25/17–07/22/17.

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 services if it would:

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

For this analysis, the Appendix G Threshold provided 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 questions.

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

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

b. Methodology

According to the L.A. CEQA Thresholds Guide, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated population of the Project. The analysis presents statistical averages

associated with the police station serving the Project Site and citywide services. The determination of impact on the capability of existing police services and personnel is based on the potential for the annual crimes per resident in the Pacific Area to exceed current averages due to the addition of the Project. Project design features and any additional mitigation measures that would reduce the impact of the Project on police services are also described.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but a social or economic impact.¹⁷ To the extent that a project causes a need for additional police protection services that result in the construction of new facilities or additions to existing facilities and the impact from that construction results in a potential impact to the environment, that is a CEQA impact that needs to be assessed in this EIR. Any discussion in this EIR that relates solely to the level of police protection provided to the residents or users of the Project area and its surrounding community, including any existing or future needs and deficiencies, is for informational purposes only. The ultimate determination of whether there is a significant impact related to police protection services will result from the construction of new or expanded police protection facilities.

c. Analysis of Project Impacts

(1) Project Design Features

The following project design features are proposed with regard to police protection:

Project Design Feature POL-PDF-1: During construction, the Applicant shall implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours shall also be provided. During construction activities, the contractor shall document the security measures and the documentation shall be made available to the construction monitor.

Project Design Feature POL-PDF-2: The Project shall include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas.

Project Design Feature POL-PDF-3: The Project shall provide proper lighting of buildings and walkways to provide for pedestrian orientation and

¹⁷ City of Hayward v. Board Trustee of California State University (2015) 242 Cal, App. 4th 833, 847

clearly identify a secure route between parking areas and points of entry into buildings.

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

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

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.

Project Design Feature POL-PDF-7: Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant shall submit a diagram of the Project Site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

Additionally, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant would implement a work site traffic control plan that would include provisions for maintaining emergency access to the Project Site during construction.

(2) Project Impacts

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

(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 Pacific Area and Pacific Community Police Station. In addition, since the existing uses on the Project Site currently generate a daytime population that may require police protection services, any demand for police protection services generated during construction of the Project would be offset by the removal of the existing uses on the Project Site. Notwithstanding, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a

temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1 provided above, temporary security measures, including security fencing, lighting, and locked entry would be implemented to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic, could also potentially affect LAPD response to the Project Site and surrounding area. Specifically, construction activities associated with the Project could affect access for police vehicles along Lincoln Boulevard, Maxella Avenue, and other main connectors and result in travel time delays caused by traffic during the construction phase. However, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, construction of the Project would generate fewer trips than the trips generated by the existing uses. In addition, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. A work site traffic control plan would also be implemented during construction of the Project pursuant to Project Design Feature TR-PDF-1 in Section IV.J, Transportation/Traffic, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the work site traffic control plan would be developed in consultation with the Los Angeles Department of Transportation and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be utilized to ensure that emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD access to the Project Site as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic as provided by the California Vehicle Code.

Based on the above, temporary construction activities associated with the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site, nor would construction of the Project significantly impact emergency response as a result of construction traffic. As such, construction of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the

construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. **Impacts on police protection services during construction of the Project would be less than significant, and no mitigation measures are required.**

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes 658 multi-family residential units and up to 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and 13,650 square feet of restaurant space. The Project would introduce a new residential, employee, and visitor population to the Project Site, thus increasing the police service population of the Pacific Area.

The Project Site is served by the Pacific Community Police Station located at 12312 Culver Boulevard approximately 1.5 miles northeast of the Project Site. The Pacific Community Police Station is staffed by 360 sworn officers and a 30-person civilian support staff. As shown in Table IV.I.2-2 on page IV.I.2-13, the Project's estimated net police service population would be 1,754 persons, which would increase the existing police service population of the Pacific Area from 200,000 persons to 201,754 persons. Despite the increase in police service population, the officer-to-resident ratio for the Pacific Area would remain at its current level of 1.8 officers per 1,000 residents. Therefore, the Project would not cause a significant change to the officer-to-resident ratio for the Pacific Area.

As shown in Table IV.I.2-1 on page IV.I.2-7, approximately 3,812 crimes were reported in the Pacific Area for 2017 year to date, which equates to a crime rate of approximately 19 crimes per 1,000 residents or 0.019 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.019 crime per capita, the Project could potentially generate approximately 33 new crimes per year.¹⁸ This would increase the annual number of crimes reported in the Pacific Area from 3,812 to 3,845 reported crimes per year, an increase of 0.9 percent.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, 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 a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas. In addition, pursuant to Project Design Features POL-PDF-3, the Project would include proper lighting of buildings

¹⁸ *Total crimes generated by the Project = estimated crime rate of 0.019 crime per capita x Project service population of 1,754 persons = 33 crimes*

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

Land Use	Units	Conversion Factor^a	Total Police Service Population
Existing			
Retail	100,781 sf	0.003 persons/sf	302
Proposed			
Residential: Studio, 1-Bedroom & 2-Bedroom Units	658 du	3 persons/unit	1,974
Commercial	27,300 sf	0.003 persons/sf	82
<i>Subtotal Proposed</i>			<i>2,056</i>
Project Net Police Service Population (Proposed – Existing)			1,754

du = dwelling units

sf = square feet

^a The following L.A. City CEQA Thresholds Guide, K. Police Service Population Conversion Factors were used: Residential (Studio, one-, and two-bedroom units): 3 persons/unit; Commercial: 3 persons/1,000 sf. The Project's new residential units would introduce an estimated residential population of 1,599 new residents, based on a 2.43 persons per household rate for multi-family units (2016 American Community Survey 5-Year Average Estimates (2012-2016) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 22, 2018). However, Section K. Police Service Population Conversion Factors in the L.A. City CEQA Thresholds Guide also provides police service population factors for residential uses. Based on these factors, full buildout of the Project would generate a net police service population of approximately 1,974 persons. The higher police service population for the Project (which is based on the police service population factors in the L.A. City CEQA Thresholds Guide) is used for purposes of providing a conservative analysis of impacts on police services provided by the Pacific Community Police Station.

Source: Eystone Environmental, 2017.

and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Furthermore, pursuant to Project Design Feature POL-PDF-4, the Project would provide sufficient lighting in parking areas to maximize visibility and reduce areas of concealment. The Project would also design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. In addition to the implementation of these project design features, which would help offset the Project-related increase in demand for police services, the Project 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 police facilities and related staffing in the community, as deemed appropriate.

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 impact emergency response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, as provided by Section 21806 of the California Vehicle Code, drivers are to yield the right-of-way and immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon stop and remain stopped until the authorized emergency vehicle has passed. As such, drivers of police emergency vehicles are able to avoid traffic by using sirens and flashing lights to clear a path of travel or by 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. Operation of the Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc....) that could impede emergency access within the vicinity of the Project Site. Therefore, the traffic generated by the Project would not significantly impact emergency response due to traffic congestion.

Additionally, as specified above in the Regulatory Framework, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of the California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.¹⁹

Based on the above analysis, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Furthermore, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the Project would not significantly impact emergency access as a result of increased traffic congestion attributable to the Project. The LAPD has determined that the Project, due to its size, would have a moderate (or average) impact on police protection services. In addition, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the General Plan Safety Element, and the Palms–Mar Vista–Del Rey Community Plan, as listed in the Regulatory Framework discussion above, the City along with LAPD would continue to monitor the demand for existing and projected police facilities. **Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. As such, impacts on police protection services would be less than significant.**

¹⁹ *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal, App. 4th 833, 843.

d. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, there are 39 related projects located in the vicinity of the Project Site. Of the 39 related projects, 20 of the related projects fall within the service boundaries of the Pacific Community Police Station service area. The remaining 19 related projects are located within the jurisdictions of the Culver City Police Department and the Los Angeles County Sheriff's Department and are not included in this analysis. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft EIR.

(1) 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. Specifically, it is anticipated that each related project would implement standard industry measures to secure the construction site and reduce the potential for theft and vandalism, thereby reducing the demand for police services during construction. In addition, as with the Project, each related project would include standard construction measures such as flag persons which would ensure that emergency access and traffic flow are maintained on adjacent right-of-ways. As such, 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 are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Therefore, the Project's contribution to cumulative impacts on either police protection services or emergency response during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(2) Operation

As shown in Table IV.I.2-3 on page IV.I.2-16, based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*, growth from the related projects that fall within the boundaries of the Pacific Area is estimated to result in an estimated total service population of 24,770 persons over time, including both residents (permanent population) and employees (daytime population).²⁰ As described above, the Project would contribute to this cumulative increase by generating a net service population

²⁰ *It is noted that the population estimates presented herein do not account for the removal of existing uses and their associated daytime/permanent populations and thus are overstated.*

**Table IV.I.2-3
Estimated Residential Service Population from Related Projects within Pacific Area**

No.^a	Project Name/Address	Land Use	Unit/Area	Conversion Factor^b	Service Population	Crimes^c
2	New Apartment & Office Building 4140 S. Glencoe Ave.	Apartments	67 du	4	268	5
3	D1 by CLG 4210 S. Del Rey Ave.	Condominiums	136 du	4	544	10
4	4040 Del Rey Avenue Apartment Project 4040 S. Del Rey Ave.	Apartments	230 du	4	920	18
5	Marina Island 5000 Beethoven St.	Apartments	236 du	4	944	18
11	Village at Playa Vista Phase II South of Jefferson Blvd./Westlawn Ave.	Condominiums	2,600 du	4	10,400	198
13	Inclave Mixed-Use Project 4065-71 Glencoe Ave.	Apartments	49 du	4	196	4
14	DIR-2016-54-DB 12575 W. Venice Blvd.	Apartments	52 du	4	208	4
15	DIR-2016-304-DB-SPR 12444 W. Venice Blvd.	Apartments	77 du	4	308	6
18	Stella Phase 2 13488 W. Maxella Ave.	Apartments	65 du	4	260	5
20	DIR-2016-3999-DB 11830 W. Courtleigh Dr.	Apartments	29 du	4	116	2
Total					14,164	270
Total Plus Project					16,138	308

du = dwelling units

Numbers may not sum precisely due to rounding.

^a *Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III., Environmental Setting, of this Draft EIR.*

^b *The following L.A. CEQA Thresholds Guide Police Service Population Conversion Factors were used: Residential (three-, four-bedroom units): 4 persons/unit (the highest rate available); Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf; Hotel: 1.5 persons/room/day.*

^c *The number of crimes is based on the crimes per capita rate currently observed in the Pacific Community Police Station service area at 0.019 crime per capita.*

^d *The L.A. CEQA Thresholds Guide does not provide a population conversion factor for this type of land use. Therefore, the highest available rate for non-residential land uses (i.e., 4 persons per 1,000 square feet for office uses) is used.*

Source: Eyestone Environmental, 2017.

of approximately 1,754 persons, including permanent residents and daytime workers. When considering only residential population, the related projects are estimated to generate 14,164 residents, plus the Project's 1,974 residents, for a total estimated service

population increase of 16,138 residents in the Pacific Area.²¹ As a result, the Pacific Area's police service population would increase from 200,000 to 216,138 residents, which would in turn decrease the officer-to-resident ratio for the Pacific Area from the current ratio of 1.8 officers per 1,000 residents to 1.7 officers per 1,000 residents. The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Pacific Area, which could increase based on per capita crime rates. Accordingly, cumulative population growth could increase the demand for LAPD services in the Pacific Area. However, as previously discussed, due to the Project design features that would be implemented as part of the Project and the Project's contribution to the General Fund, the Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site.

Similar to the Project, each related project would be subject to the City's routine 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 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.²² In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

With regard to emergency response, the Project and related projects would introduce new uses in the Project area that would generate additional traffic. Any resulting traffic congestion would have the potential to impact emergency access to the Project Site and surrounding properties. As discussed above, the Project is not anticipated to substantially affect emergency response in the Pacific Area, and the Project would not contribute to a cumulative impact relative to emergency access. Moreover, the drivers of

²¹ *The population estimates presented herein are based on the Service Population Conversion Factors provided in the L.A. City CEQA Thresholds Guide for purposes of evaluating impacts on LAPD services. These estimates may not accurately reflect each related project's anticipated demographics.*

²² *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

emergency vehicles would continue to have for 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 California Vehicle Code Section 21806.

Additionally, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document.

Based on the above, the Project 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.

e. Mitigation Measures

Project-level and cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

f. Level of Significance After Mitigation

Project-level and cumulative impacts related to police protection services would be less than significant.