

IV. Environmental Impact Analysis

K.2 Public Services—Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services within the Project area and provides an analysis of the Project's potential impacts to police protection facilities. The focus of the analysis is the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site. This section is based in part on information provided by the LAPD's Community Relationship Division, in a letter dated December 10, 2018, which is included in Appendix M of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) California Vehicle Code

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

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person

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.

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 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 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. 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 and that it is reasonable to conclude that a city will comply with that provision to ensure that public safety services are provided.² Furthermore, as the court concluded, the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.³

(2) Local

(a) Los Angeles General Plan Framework Element

The City of Los Angeles 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 neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.⁴ Objective 9.13 and Policy 9.13.1 require the

² *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, 847

³ *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, 843.

⁴ *The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services.*

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. Furthermore, 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 by providing a program where crime data can be collected, mapped, and analyzed to provide statistical and geographical information of trends in crime. This information provides police departments a "snapshot" of crime activity in their jurisdiction and allows police managers to focus and develop plans to reduce crime in high crime areas. Under COMPSTAT, Part 1 Crimes were reduced by approximately four percent in 2003 (homicides were reduced by approximately 21 percent during this period, when compared to 2002).^{5,6,7} For the four-week period after implementation of COMPSTAT Plus in the LAPD's Southeast Area in 2004, violent crimes were down 11 percent.⁸

(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

⁵ *Part I 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 September 28, 2020.*

⁶ *William J. Bratton and Sean W. Malinowski, Police Performance Management in Practice: Taking COMPSTAT to the Next Level, 2008.*

⁷ *LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed September 28, 2020.*

⁸ *LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed September 28, 2020.*

Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2.

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) Central City North Community Plan

The Project Site is located within the Central City North Community Plan area. The Central City North Community Plan, adopted on December 15, 2000 and amended on September 7, 2016, describes specific goals and policies related to police protection services and public safety. Policies and objectives relevant to the Project are as follows:

- 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. 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.⁹ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD's 21 community police stations.¹⁰ Each geographic bureau is comprised of four to five geographic areas/police stations.¹¹

As of December 2019, the departmental staffing resources within the LAPD included 10,031 sworn officers. Based on a total City population of 4,007,147, the LAPD currently has an officer-to-resident ratio of approximately 2.5 officers for every 1,000 residents.¹²

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.¹³ The Central Bureau oversees operations in the Central, Hollenbeck, Newton, Northeast, and Rampart service areas.¹⁴ The Central Bureau also oversees the Central Traffic Division.¹⁵

(2) LAPD Community Police Station

Within the Central Bureau, the Project Site is located within the Central service area, which is served by the Central Community Police Station. As shown in Figure IV.K.2-1 on page IV.K.2-6, the Central Community Police Station is located at 251 East 6th Street, approximately 2.5 miles south of the Project Site. The Central Community Police Station service area covers approximately 4.5 square miles and is bounded by Stadium

⁹ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed September 28, 2020.

¹⁰ LAPD, *Community Police Station Address Directory*, www.lapdonline.org/our_communities/content_basic_view/6279, accessed September 28, 2020.

¹¹ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed September 28, 2020.

¹² LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 11/10/19–12/07/19*, <http://assets.lapdonline.org/assets/pdf/cityprof.pdf>, accessed December 17, 2019.

¹³ LAPD, *About Central Bureau*, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed September 28, 2020.

¹⁴ LAPD, *About Central Bureau*, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed September 28, 2020.

¹⁵ LAPD, *About Central Bureau*, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed September 28, 2020.

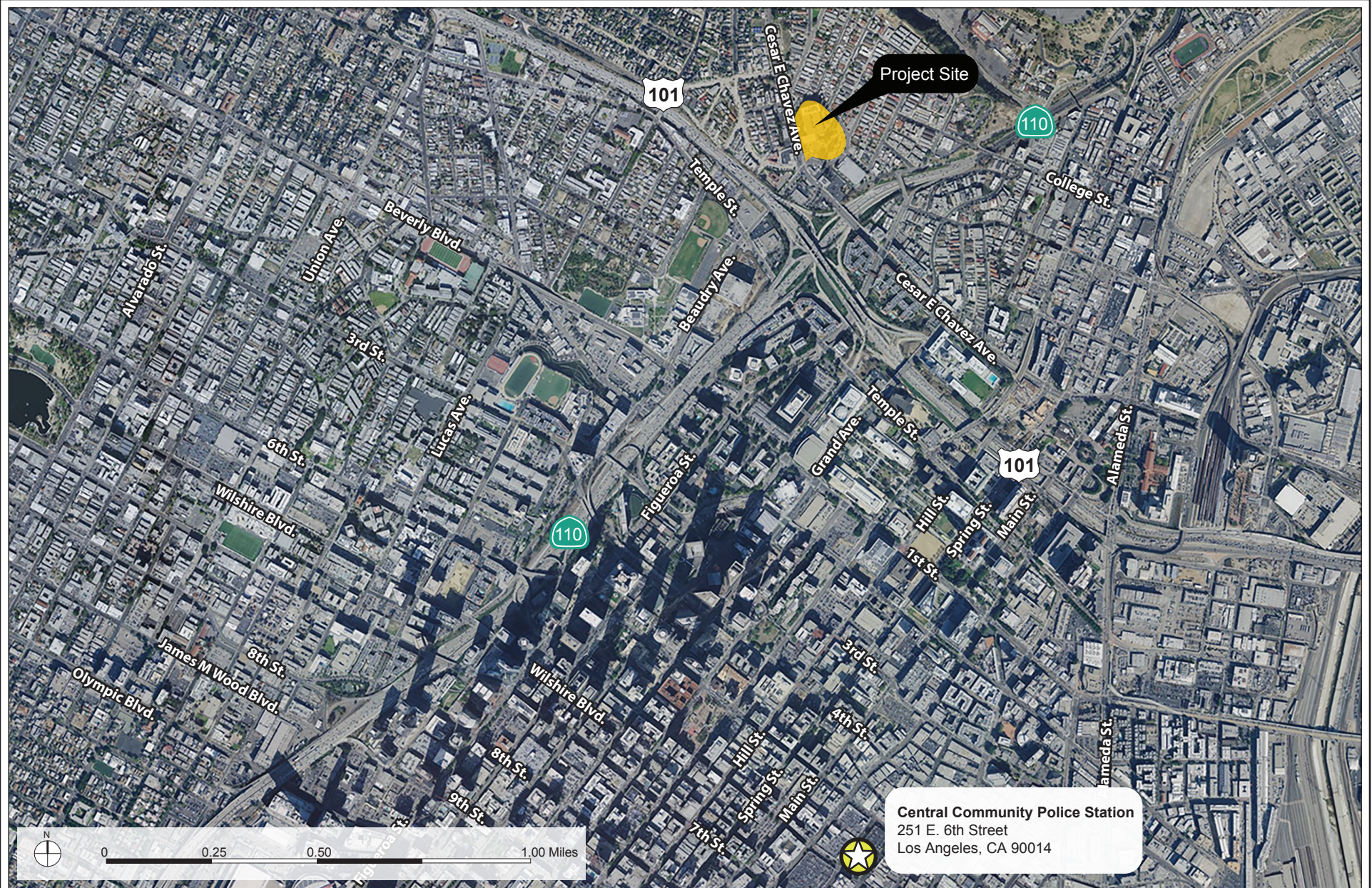


Figure IV.K.2-1
Police Station Serving the Project Site

Way and the Pasadena Freeway to the north, Washington Boulevard and 7th Street to the south, the Los Angeles River to the East, and the Harbor Freeway to the West.¹⁶

The Central Community Police Station serves a population of approximately 40,000 residents and is staffed by approximately 370 sworn officers and 30 civilian support staff. The average response time for emergency and non-emergency calls of the Central Community Police Station in 2018 was 2.8 and 19.6 minutes, respectively.¹⁷ Based on the police service population of 40,000 residents, the officer-to-resident ratio of the Central Community Police Station is approximately 9.25 officers per 1,000 residents. As such, the officer-to-resident ratio in the Central Area is higher than the citywide ratio of 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.K.2-1 on page IV.K.2-8 provides a comparison of the Central Area and citywide data regarding crimes as reported by the LAPD based on residential populations only. As shown therein, based on the most recent data made available by the LAPD Community Relationship Division and COMPSTAT for the 2019 year to date (YTD), approximately 7,226 crimes were reported within the Central Area and 113,434 crimes were reported citywide. Based on the service population of the Central Community Police Station, approximately 180.6 crimes per 1,000 residents (0.1806 crime per capita) were reported in the Central Area and 28.3 crimes per 1,000 residents (0.0283 crime per capita) were experienced citywide.

Based on the number of sworn officers in the Central Community Police Station (370 sworn officers), the current 2019 ratio of crimes per officer is 19.5 crimes per officer in comparison to a 2019 citywide ratio of 11.3 crimes per officer (10,031 sworn officers citywide). Thus, the Central Area has a higher crime per officer ratio compared to the citywide ratio.

¹⁶ *Written correspondence from Darnell D. Davenport, Community Outreach and Development Division, Los Angeles Police Department, December 10, 2018. See Appendix M of this Draft EIR.*

¹⁷ *Written correspondence from Darnell D. Davenport, Community Outreach and Development Division, Los Angeles Police Department, December 10, 2018. See Appendix M of this Draft EIR..*

**Table IV.K.2-1
2019 YTD Crimes—Central Area and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Central Area	7,226	40,000	180.6/1,000	0.1806
Citywide	113,434	4,007,147	28.3/1,000	0.0283
<p>Source: LAPD, COMPSTAT Unit, COMPSTAT Central Area Profile 11/10/19–12/07/19 and COMPSTAT Citywide Profile 11/10/19–12/07/19.</p>				

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
- 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 the Project. The determination of impact on the capability of existing police services and personnel is based in part on the potential for the annual crimes per resident in the Central service area to exceed current averages due to the addition of the Project. Project design features that would reduce the impact of the Project on police services are also described.

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 an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to police services is determined by whether construction of new or expanded police facilities is reasonably foreseeable direct or indirect effect of the project. There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 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.

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: Prior to the start of 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.

Project Design Feature POL-PDF-2: During operation, the Project shall incorporate a 24-hour/seven-day security plan to ensure the safety of its residents and site visitors. The Project's security plan could include, but not be limited to, the following design features:

- Installing and utilizing a 24-hour security camera network throughout the underground parking structure, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces;
- Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas;
- Maintaining staff on-site, including at the lobby concierge desk and within the car valet area. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed; and
- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property.

Project Design Feature POL-PDF-3: The Project shall provide lighting of buildings 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-4: The Project shall provide 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.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development

Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. Both development scenarios are evaluated in the following analysis.

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 Area since the daytime population generated at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures, including security fencing, lighting, and locked entry to secure the Project Site during construction, in addition to providing regular security patrols during non-construction hours. 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 reduced.

Construction activities could also potentially affect LAPD response due to reduced capacities of adjacent streets. As discussed in Section IV.L, Transportation, of this Draft EIR, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, and Beaudry Avenue. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. 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. In

addition, as discussed in Section IV.L, Transportation, of this Draft EIR, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.L, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. 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, construction activities associated with the Project would not generate a demand for additional police protection services that would necessitate the provision of new or physically altered government facilities. Accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection during Project construction would be less than significant.

(b) Operation

As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. The Project would introduce a new residential and visitor population to the Project Site and would increase LAPD's residential service population in the Central Area.

The Mixed Use Development Scenario is anticipated to generate an estimated total police service population of approximately 2,359 persons, including 1,777 residents¹⁸ and 582 employees.¹⁹ The No-Hotel Development Scenario is anticipated to generate an estimated total police service population of approximately 2,486 persons, including 1,994

¹⁸ Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

¹⁹ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.5 employee per room for "Hotel" land use is applied to the 180 hotel rooms, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 18,200 square feet of commercial uses, the rate 0.004 employee per square foot for "Supermarket" land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for "Health Club" land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 35,000-square-foot restaurant, and the rate 0.004 employee per square foot for "General Office" land use is applied to the 48,000 square feet of office uses.

residents²⁰ and 492 employees.²¹ As an increase in the police service population is directly associated with an increase in the residential population, the No-Hotel Development Scenario, including up to 827 units, 48,000 square feet of office space, and 95,000 square feet of general commercial floor area is anticipated to generate a greater police service population. It is noted, however, that the Mixed Use Development Scenario is anticipated to generate a greater overall visitor population associated with the proposed hotel and additional commercial uses not proposed under the No-Hotel Development Scenario.

As discussed above, the Central Area, in which the Project Site is located, is served by the Central Community Police Station located approximately 2.5 miles south of the Project Site and is staffed by 370 sworn officers and a 30-person civilian support staff. The Mixed Use Development Scenario residential service population of up to 1,777 residents would increase the existing police service population of the Central Community Police Station from 40,000 persons to approximately 41,777 persons. With the increase in the police service population, the officer-to-resident ratio for the Central Area would decrease from approximately 9.25 officers per 1,000 residents to approximately 8.9 officers per 1,000 residents. The 1,994 residents generated under the No-Hotel Development Scenario would increase the existing police service population of the Central Community Police Station from 40,000 persons to up to 41,994 persons. With the increase in the police service population, the officer-to-resident ratio for the Central Area would decrease from approximately 9.25 officers per 1,000 residents to approximately 8.8 officers per 1,000 residents. Overall, the officer-to-resident ratio generated by both development scenarios would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Nevertheless, both the Mixed Use Development Scenario and the No-Hotel Development Scenario would not cause a substantial change in the officer-to-resident ratio for the Central Area and Central Community Police Station.

As shown in Table IV.K.2-1 on page IV.K.2-8, approximately 7,226 crimes were reported in the Central Area for 2019 YTD, which equates to a crime rate of approximately 180.6 crimes per 1,000 residents or 0.1806 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.1806 crime per capita, the Mixed Use

²⁰ Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

²¹ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.002 employee per square foot for “General Retail” land use is applied to the 18,200 square feet of commercial uses, the rate 0.004 employee per square foot for “Supermarket” land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for “Health Club” land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 35,000-square-foot restaurant, and the rate 0.004 employee per square foot for “General Office” land use is applied to the 48,000 square feet of office uses.

Development Scenario's net residential service population could potentially generate approximately 321 new crimes per year and the No-Hotel Development Scenario's net residential service population could potentially generate approximately 361 new crimes per year. The Mixed Use Development Scenario's 321 new crimes would increase the annual number of crimes reported in the Central Area from 7,226 to 7,547 reported crimes per year, an increase of approximately 4.4 percent. The No-Hotel Development Scenario's 361 new crimes would increase the annual number of crimes reported in the Central Area from 7,226 to 7,587 reported crimes per year, an increase of approximately 5 percent.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-5, 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 24-hour/seven-day security plan to ensure the safety of its residents and site visitors. The Project's security plan could include a 24-hour security camera network throughout the Project, controlling access to all buildings, maintaining all staff on-site, and training staff on security policies for the Project's buildings. In addition, the Project would provide lighting of buildings and walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3, as well as provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment, as set forth by Project Design Feature POL-PDF-4. Furthermore, Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. In addition to the implementation of these site security 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.²² The proposed Project Design Features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police services. Overall, as provided by the LAPD in its letter included in Appendix M of this Draft EIR, a project of this size could have a minor impact on police services in the Central Area. Therefore, the Project's impact on police services would be less than significant.

The Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. As such, Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic congestion. However, as described in Section II, Project Description, of this Draft EIR, vehicular

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

access, including emergency access to the Project Site would be provided via six vehicular access points as follows:

1. Sunset Boulevard, intended to serve commercial and office uses;
2. White Knoll Drive, providing access to the Elysian Parking Facility and fire and emergency vehicle access;
3. Alpine Street, providing secondary commercial and residential access and primary service access;
4. Beaudry Avenue, providing primary residential access;
5. Beaudry Avenue, providing inbound access to the Sunset Building pick-up / drop-off area; and
6. Sunset Boulevard, providing right-in/right-out access to and from the Sunset Building pick-up/drop-off area.

As discussed in detail in Section IV.L. Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, the Project's impact on emergency response times would be less than significant.**

Based on the analysis and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2) to provide these services, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction; and would not inhibit LAPD response.

Based on the above analysis, the Project would not generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site. The Project also would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD's capability to serve the Project Site. Thus, impacts to police protection services would be less than significant.

(2) Mitigation Measures

Project-level impacts 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

Cumulative growth in the greater Project area through 2028 (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 89 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project No. 1 through 89 is a conservative assumption, as some of the related projects may not be built out by 2028, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City and will be incorporated into the Central City North Community Plan update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing. To provide a conservative forecast, the future baseline forecast assumes that Related Project No. 1 through 89 are fully built out by 2028, unless otherwise noted. Of the 89 related projects, 37 related projects fall within the boundaries of the Central Area, are served by the Central Community Police Station, and include residential uses.²³

²³ When calculating service ratios, LAPD considers only the residential service population of the service area.

(1) Impact Analysis

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Should Project construction occur concurrently with that of nearby related projects, coordination among these multiple construction sites would be required and implemented through each development's construction management plan, 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 be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, given the short-term and intermittent nature of construction activities, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within the Project Site vicinity as drivers of police vehicles have the ability to avoid traffic, pursuant to CVC Section 21806. **Therefore, cumulative construction impacts on police protection services would be less than significant.**

(b) Operation

As shown in Table IV.K.2-2 on page IV.K.2-18, based on the household size factor of 2.41 persons per household, the residential component of related projects that fall within the boundaries of the Central Area and that would be served by the Central Community Police Station would generate approximately 33,511 residents.

As described above, the Project would contribute to this cumulative increase by generating a service population of approximately 1,777 residents under the Mixed Use Development Scenario and approximately 1,994 residents under the No-Hotel Development Scenario. As such, the 33,511 residents generated by the related projects plus the Mixed Use Development Scenario's 1,777 residents would result in an estimated increase of 35,288 residents in the Central Area. The 33,511 residents generated by the related projects plus the No-Hotel Development Scenario's 1,994 residents would result in an estimated increase of 35,505 residents in the Central Area.²⁴ It is noted that the estimated number of residents associated with related projects are 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.

²⁴ *The population estimates presented herein are based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

Table IV.K.2-2
Estimated Service Population from Related Projects within Central Area

No.^a	Project Name/Address	Land Use	Unit/Area^b	Service Population	Crimes^d
2	Tenten Wilshire Expansion (The Icon) 1027 W. Wilshire Blvd.	Condominiums	402 du	969	175
3	Da Vinci Apartments 327 N. Freemont Ave.	Apartments	600 du	1,446	262
4	1101 North Main Condos 1101 N. Main St.	Condominiums	316 du	762	138
5	5th & Olive 437 S. Hill St.	Condominiums	660 du	1,591	288
9	Grand Avenue Project 100 S. Grand Ave.	Condominiums	968 du	2,333	422
		Apartments	242 du	583	106
12	Mixed Use 534 S. Main St.	Apartments	160 du	386	70
14	Mixed Use 400 S. Broadway	Apartments	450 du	1,085	196
15	Mixed Use 601 S. Main St.	Apartments	452 du	1,089	197
16	La Plaza Cultura Village 527 N. Spring St.	Apartments	345 du	831	151
21	Apartments 118 S. Astronaut E.S. Onizuka St.	Apartments	77 du	186	34
22	Stadium Way and Chavez Ravine Apartments 959 E. Stadium Way	Apartments	158 du	381	69
23	Mixed Use 700 W. Cesar E. Chavez Ave.	Apartments	300 du	723	131
25	Medallion Phase 2 300 S. Main St.	Apartments	471 du	1,135	206
29	Sunset Everett Mixed Use 1185 W. Sunset Blvd.	Apartments	214 du	516	94
		Single-Family Homes	6 du	14	3
		Condominiums	6 du	14	3
32	Everett Street (1013) Project 1013 Everett St.	Apartments	49 du	118	22
33	Hill Mixed Use Project 708 N. Hill St.	Apartments	162 du	390	71
34	Alpine Mixed Use 211 W. Alpine St.	Apartments	122 du	294	54
35	Beaudry Ave & 2nd Street Mixed Use Project 130 S. Beaudry Ave.	Apartments	220 du	530	96

Table IV.K.2-2 (Continued)
Estimated Service Population from Related Projects within Central Area

No.^a	Project Name/Address	Land Use	Unit/Area^b	Service Population	Crimes^d
36	College Station Mixed Use 129 W. College St., 924 N. Spring St.	Apartments	770 du	1,856	336
39	Mitsui Fudosan (Eight and Figueroa Tower) 744 S. Figueroa St.	Apartments	436 du	1,051	190
40	945 West 8th St. 845 W. 8th St.	Apartments	781 du	1,882	340
41	Brooks Building 644 S. Broadway	Apartments	30 du	72	14
42	Ferrante 1000 W. Temple St.	Apartments	1,500 du	3,615	653
45	643–655 North Spring Street 643–655 N. Spring St.	Apartments	281 du	677	123
46	1201 North Broadway Mixed Use 1201 N. Broadway	Apartments	118 du	284	52
53	433 South Main Street 433 S. Main St.	Condominiums	196 du	472	86
55	Elysian Park Lofts 1030–1380 N. Broadway	Apartments	920 du	2,217	401
56	Mixed Use (Times Mirror Square) 100 S. Broadway	Apartments	1,127 du	2,716	491
58	1018 West Ingraham Street 1018 W. Ingraham St.	Apartments	43 du	104	19
59	8th/Grand/Hope Project 754 S. Hope St.	Condominiums	409 du	986	179
64	Apartments 1301 W. Sunset Blvd.	Apartments	45 du	108	20
67	Alameda District Plan Union Station Terminal Annex	Residential	22 du	53	10
68	Hellman/Banco Building 354 S. Spring St.	Apartments	212 du	511	93
69	Foreman and Clark Building 701 S. Hill St.	Apartments	165 du	398	72
71	Equity Residential Mixed Use 340 S. Hill St.	Apartments	406 du	978	177
75	708 South New Depot Street Residential 708 S New Depot St.	Apartments	33 du	80	15
77	5th & Hill 323 W. 5th St.	Apartments	31 du	75	14
Related Projects Residential Service Population				33,511	6,073

Table IV.K.2-2 (Continued)
Estimated Service Population from Related Projects within Central Area

No.^a	Project Name/Address	Land Use	Unit/Area^b	Service Population	Crimes^d
	Mixed Use Development Scenario Residential Service Population			1,777	321
	Total Residential Service Population for Related Projects and Mixed Use Development Scenario			35,288	6,394
	No-Hotel Development Scenario Residential Service Population			1,994	361
	Total Residential Service Population for Related Projects and No-Hotel Development Scenario			35,505	6,434
<p><i>du = dwelling units</i></p> <p><i>Numbers may not sum precisely due to rounding.</i></p> <p>^a <i>Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III., Environmental Setting, of this Draft EIR.</i></p> <p>^b <i>Based on guidance from the LAPD, the analysis focuses on the increased population associated with residential uses.</i></p> <p>^c <i>Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.</i></p> <p>^d <i>The number of crimes is based on the crimes per capita rate currently observed in the Central Community Police Station service area at 0.1806 crime per capita.</i></p> <p><i>Source: Eyestone Environmental, 2020.</i></p>					

Notwithstanding, when considering these estimates, the Central Area's police service population would increase from 40,000 to 75,288 residents under the related projects plus Mixed Use Development Scenario and 40,000 to 75,505 residents under the related projects plus No-Hotel Development Scenario, which would in turn decrease the officer-to-resident ratio for the Central Area from the current ratio of 9.25 officers per 1,000 residents to 5 officers per 1,000 residents under both development scenarios.

The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Central Area, which could increase based on per capita crime rates. Accordingly, cumulative population growth could increase the demand for LAPD services in the Central Area. Assuming the same crime-per-capita rate currently observed in the Central Area (0.1806 crime per capita), the residential population of the Mixed Use Development Scenario and related projects could generate an additional 6,394 crimes per year and the residential population of the No-Hotel Development Scenario and related projects could generate an additional 6,434 crimes per year. This degree of cumulative population growth and the associated increased crime

statistics could increase the demand for LAPD services in the Central Area. However, of the 6,394 potential crimes per year, the Mixed Use Development Scenario's potential incremental contribution is only 321 crimes per year. Additionally, of 6,434 potential crimes per year, the No-Hotel Development Scenario's potential incremental contribution is only 361 crimes per year. As previously discussed, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-5 to reduce the demand for police protection services on the Project Site. Therefore, the Project's incremental impact is not cumulatively considerable.

Additionally, similar to the Project, each related project would be subject to the City's routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the Regulatory Framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. 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.²⁵ 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 increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays. As discussed above, the Project is not anticipated to substantially affect emergency response times in the Central Area, and the Project would not contribute to a cumulative impact relative to emergency response times. 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, pursuant to CVC Section 21806.

Additionally, consistent with 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

²⁵ *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

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 under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration 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 and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered government facilities (i.e., police), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution would not be cumulatively considerable, and 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.