

IV. Environmental Impact Analysis

I.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 July 17, 2018, which is included in Appendix I.2 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 the 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

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.

public safety needs of that neighborhood.⁴ 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. 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

⁴ *The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services, adopted December 1996, readopted August 2001.*

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 December 5, 2019.*

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 December 5, 2019.*

⁸ *LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed December 5, 2019.*

(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.

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 Community Plan

The Project Site is located within the Central City Community Plan area. The Central City Community Plan, last updated in 2003, describes specific goals, objectives, and policies related to police protection services and public safety. Objectives and policies related to police protection are as follows:

- Objective 5-1: To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.
 - Policy 5-1.1: Consult with the Police Department as part of the review of significant development projects and General Plan amendments affecting land use to determine the impact on law enforcement service demands.
 - Policy 5-1.2: Promote the establishment of Police facilities and programs which provide police protection at a neighborhood level.
- Objective 5-2: To inform developers, design professionals, and the public of the possible reduction of criminal opportunities when crime prevention principles are developed during the initial planning stages of a development.
 - Policy 5-2.1: Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.

b. Existing Conditions

(1) LAPD Service Area and Bureaus

The LAPD service area covers approximately 467 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 November 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 Area, which is served by the Central Community Police Station. As shown in Figure IV.I.2-1 on page IV.I.2-6, the Central Community Police Station is located at 251 East 6th Street, approximately 1.1 miles south of the Project Site. The Central Community Police Station service area covers approximately 4.5 square miles and is bounded by Stadium Way and

⁹ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed December 5, 2019.

¹⁰ LAPD, *Community Police Station Address Directory*, www.lapdonline.org/our_communities/content_basic_view/6279, accessed December 5, 2019.

¹¹ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed December 5, 2019.

¹² LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 11/03/19–11/30/19*, <http://assets.lapdonline.org/assets/pdf/cityprof.pdf>, accessed December 5, 2019.

¹³ LAPD, *About Central Bureau*, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed December 5, 2019.

¹⁴ LAPD, *About Central Bureau*, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed December 5, 2019.

¹⁵ LAPD, *About Central Bureau*, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed December 5, 2019.

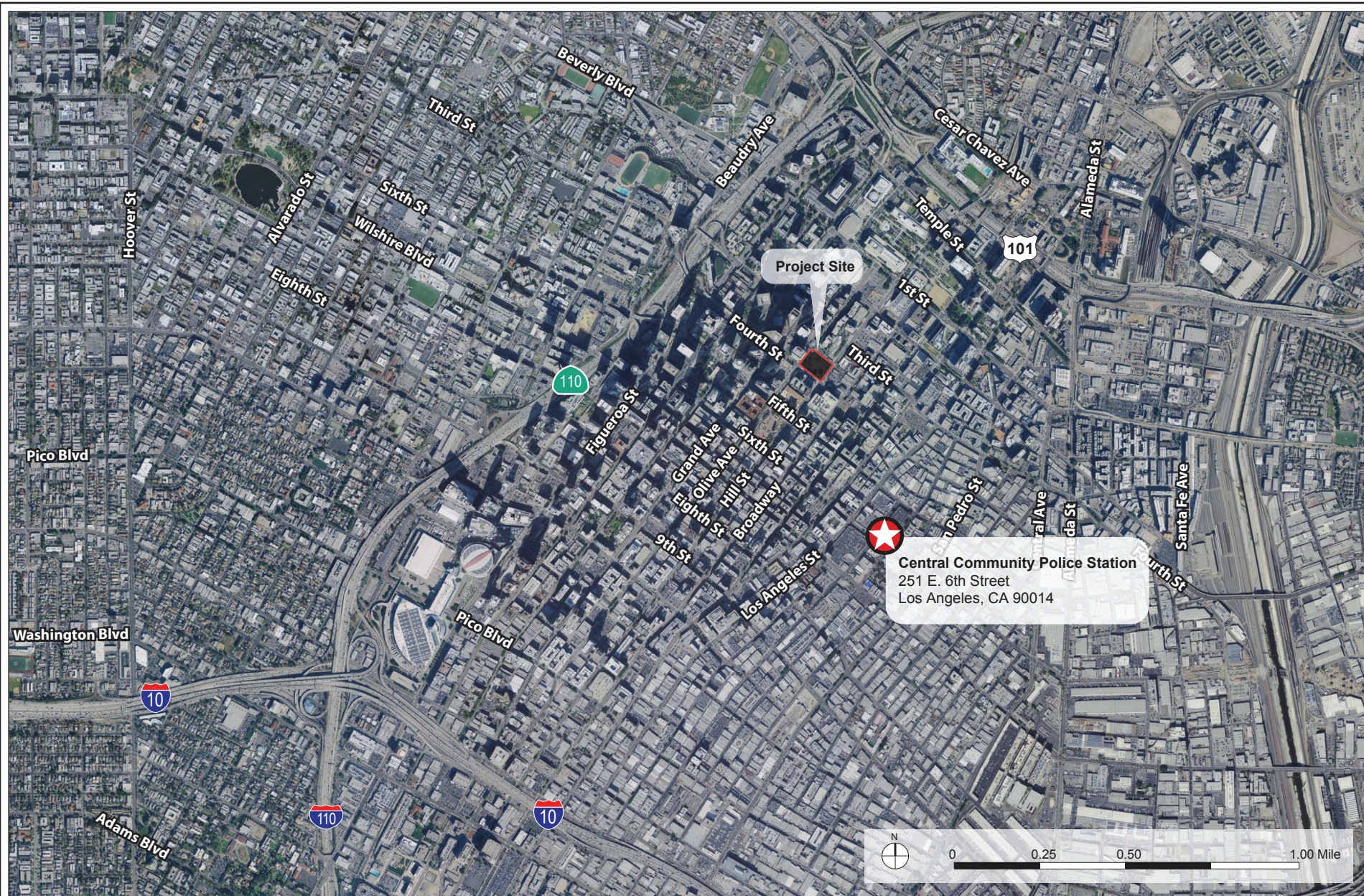


Figure IV.I.2-1
Police Stations Serving the Project Site

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 2017 was 2.7 and 13.7 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.I.2-1 on page IV.I.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, approximately 7,071 crimes were reported within the Central Area and 111,055 crimes were reported citywide. Based on the service population of the Central Community Police Station, approximately 176.8 crimes per 1,000 residents (0.1768 crime per capita) were reported in the Central Area and 27.7 crimes per 1,000 residents (0.0277 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 19.1 crimes per officer in comparison to a 2019 citywide ratio of 11.1 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 Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, July 17, 2018. See Appendix I.2 of this Draft EIR.*

¹⁷ *Written correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, July 17, 2018. See Appendix I.2 of this Draft EIR.*

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

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Central Area	7,071	40,000 ^a	176.8/1,000	0.1768
Citywide	111,055	4,007,147	27.7/1,000	0.0278

^a Written correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, July 17, 2018. See Appendix I.2 of this Draft EIR.

Source: LAPD, COMPSTAT Unit, COMPSTAT Central Area Profile 11/03/19–11/30/19 and COMPSTAT Citywide Profile 11/03/19–11/30/19.

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 factors 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 Area to exceed current averages due to the addition of the Project, combined with an analysis of whether the increase in service requirements triggers the need to construct or expand a police facility in a manner that would result in substantial adverse environmental impacts. Project design features that would reduce the impact of the Project on police services are also described.

c. Project Design Features

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

Project Design Feature POL-PDF-1: During construction, the Applicant 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 private 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

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. Thus, 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.

Construction activities could also potentially affect LAPD response due to reduced capacities of adjacent streets. As discussed in Section IV.J, 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. As such, sidewalks surrounding the Project Site could 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.J, 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.J, 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 that 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. Thus, temporary construction activities associated with the Project would not cause a substantial increase in emergency response times as a result of increased traffic congestion.

Therefore, the Project construction activities would not result in substantial adverse physical impacts associated with the provision or need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Impacts on police protection services 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.

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes: 180 residential for-sale condominiums; 252 residential apartments; two hotels with a combined total of 515 guest rooms and 12,170 square feet of commercial (restaurant) space; and 72,091 square feet of general commercial (retail/restaurant) uses. These uses would generate an estimated total service population of 1,577 persons, including 1,042 residents and 535 employees.¹⁸ While LAPD bases its service population, officer to population ratio, and crime statistics on residential population only, this analysis considers the Project's resident population together with its employee population to provide a conservative analysis of Project-level impacts.

As discussed above, the Central Area, in which the Project Site is located, is served by the Central Community Police Station located approximately 1.1 miles south of the Project Site and is staffed by 370 sworn officers and a 30-person civilian support staff. The Project's total service population of up to 1,577 persons would increase the existing police service population of the Central Community Police Station from approximately 40,000 persons to approximately 41,577 persons. With this 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 8.90 officers per 1,000 residents (9.02 if only the Project's residential population is considered), which would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Therefore, the Project would not cause a substantial change in the officer-to-resident ratio for the Central Area and Central Community Police Station.

In addition, the most common crimes in the Central Area are personal/other theft and burglary from motor vehicles, which would be addressed by the Project Design Features POL-PDF-2 through POL-PDF-5.¹⁹ As provided above in Project Design Features POL-PDF-2 through POL-PDF-5, which were reviewed and approved by the LAPD, the Project would include operational design features to enhance safety within and immediately surrounding the Project Site, as well as to reduce potential impacts to police

¹⁸ See Table IV.H-2 in Section IV.H, Population and Housing, of this Draft EIR, for the basis of these estimates.

¹⁹ The written correspondence from LAPD for the Project (e.g., from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, July 17, 2018, included as Appendix I.2 of this Draft EIR) references the Newton Area rather than the Central Area regarding the most common crimes. We believe this is a typographical error as the COMPSTAT data for the Central Area (LAPD, COMPSTAT Unit, COMPSTAT Central Area Profile 11/03/19–11/30/19 and COMPSTAT Citywide Profile 11/03/19–11/30/19) does indeed identify personal/other theft and burglary from motor vehicles as the most common crimes in the Central Area.

protection services. 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.²⁰ The Project's design features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police services. Overall, as provided by the LAPD in their letter included in Appendix I.2 of this Draft EIR, a project of this size could have a minor impact on police services in the Central Area.²¹

The Project would introduce new uses to the Project Site which would also generate additional traffic in the vicinity of the Project Site. Project-related traffic would have the potential to increase LAPD emergency 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 access, including emergency access to the Project Site, would be provided via two access points, including one at Olive Street and another at 4th Street. The Project would not close any existing streets, nor would it include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within or in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area. In addition, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in LAPD emergency response times due to traffic congestion.

²⁰ *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

²¹ *Written correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, July 17, 2018. See Appendix I.2 of this Draft EIR.*

Lastly, 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.²²

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 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 any of police protection. 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

(1) Impact Analysis

Cumulative growth in the greater Project area through 2026 (the Project's anticipated buildout year) would include specific known development projects, as well as general ambient growth projected to occur.²³ As identified in Section III, Environmental

²² *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal, App. 4th 833, 843.

²³ As indicated in Section II, Project Description, of this Draft EIR, 2026 is the anticipated buildout year for the Project while 2028 is the anticipated year of full occupancy of the Project. The cumulative analysis here is based on the related projects list in the LADOT-approved Transportation Assessment which is keyed to 2028 which is more inclusive (e.g., contains more related projects) than a related projects list keyed to 2026. Hence, using the related projects list from the approved Transportation Assessment provides a conservative analysis here.

Setting, of this Draft EIR, there are 50 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project No. 1 through 50 is a conservative assumption, as some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan Update, known as the draft Downtown Community Plan, which the Department of City Planning is in the process of preparing (referenced for informational purposes only as not an adopted plan). To provide a conservative forecast, the future baseline forecast assumes that Related Project No. 1 through 50 are fully built out by 2026, unless otherwise noted. Of the 50 related projects, 38 fall within the boundaries of the Central Area, are served by the Central Community Police Station, and are residential in nature.

(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 (for example, as could potentially occur associated with the construction of Related Project Nos. 1, 2, 4 and 5), 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, the Project would not independently, or when combined with the related projects, directly require the development of a new or expanded police facility. Therefore, the Project would not result in a cumulatively considerable or substantial adverse physical impact associated with the provision or need for new or physically altered governmental facilities, that 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. Cumulative construction impacts on police protection services would be less than significant.**

(b) Operation

The geographic context for cumulative analysis for police protection is the Central Community Police Station service area (e.g., Central Area). Thirty-eight related projects

identified in Section III, Environmental Setting, of this Draft EIR are within the Central Community Police Station service area. The increase in development and service population from these related projects would generate, in conjunction with the Project, the need for additional police protection from the Central Community Police Station. As discussed below, however, the incremental increase in demand on LAPD services would not result in a cumulatively considerable impact.

As shown in Table IV.1.2-2 on page IV.1.2-17, the residential component of the 38 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 37,577 residents. With the addition of the Project's total estimated service population of 1,577 persons, the total cumulative service population would be 39,154 persons in the Central Area. It is noted that the estimated service population for the related projects is conservative because it does not account for the removal of existing uses and their associated existing service demand. Notwithstanding, when considering these estimates, the Central Area's police service population would increase from 40,000 to 79,154, 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 4.67 officers per 1,000 residents. The additional population associated with the Project together with the related projects would likewise have an effect on crime in the Central Area, which as indicated in Table IV.1.2-2 would increase by an estimated 7,023 crimes annually. Accordingly, cumulative population growth could increase the demand for LAPD services in the Central 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.

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.²⁴ 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

²⁴ *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

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

No.^a	Project Name/Address	Land Use	Unit/Area^b	Service Population^c	Annual Crimes^d
1	Equity Residential Mixed-Use 340 S. Hill St.	Apartments	406 du	978	173
		Affordable	22 du	53	9
2	5th & Olive (formerly Park Fifth Project) 437 S. Hill St.	Condominiums	660 du	1,591	281
3	Mixed-Use 400 S. Broadway	Apartments	450 du	1,085	192
5	5th & Hill 323 W. 5th St.	Apartments	31 du	75	13
6	Grand Avenue Project 100 S. Grand Ave.	Apartments	412 du	993	176
		Condominiums	1,648 du	3,972	702
7	Hellman / Banco Building 354 S. Spring St.	Apartments	212 du	511	90
8	Tribune (LA Times) South Tower Project 222 E. 2nd St.	Condominiums	107 du	258	46
9	433 S Main Street 433 S. Main St.	Condominiums	196 du	472	84
10	Medallion Phase 2 300 S. Main St.	Apartments	471 du	1,135	201
11	Mixed-Use (Times Mirror Square) 100 S. Broadway	Apartments	1,127 du	2,716	480
13	Mixed-Use 601 S. Main St.	Apartments	452 du	1,089	193
15	Broadway Mixed-Use 955 S. Broadway	Apartments	163 du	393	69
16	Wilshire Grand Project 900 W. Wilshire Blvd.	Apartments	100 du	241	43
18	Mixed-Use 737 S. Spring St.	Apartments	320 du	771	136
19	Mixed-Use 732 S. Spring St.	Apartments	400 du	964	170
20	8th/Grand/Hope Project 754 Hope St.	Condominiums	409 du	986	174
22	Mixed-Use 820 S. Olive St.	Apartments	589 du	1,419	251
23	Mixed-Use 840 S. Olive St.	Condominiums	303 du	730	129
24	7th & Maple Mixed-Use 701 S. Maple Ave.	Apartments	452 du	1,089	193
25	Mitsui Fudosan (Eighth and Figueroa Tower) 744 S. Figueroa St.	Apartments	436 du	1,051	186
26	945 W 8th Street 945 W. 8th St.	Apartments	781 du	1,882	333
28	Alexan South Broadway 850 S. Hill St.	Apartments	305 du	735	130

Table IV.1.2-2 (Continued)
Estimated Service Population from Related Projects within Central Area

No.^a	Project Name/Address	Land Use	Unit/Area^b	Service Population^c	Annual Crimes^d
29	845 Olive & 842 Grand Mixed-Use 845 S. Olive St.	Apartments	208 du	501	89
30	Embassy Tower 848 S. Grand Ave.	Condominiums	420 du	1,012	179
31	Southern California Flower Market Project 755 S. Wall St.	Apartments	323 du	778	138
33	Weingart Tower—Affordable Housing 554 S. San Pedro St.	Affordable	378 du	911	161
		Apartments	4 du	10	2
35	Mixed-Use 609 E. 5th St.	Apartments	151 du	364	64
37	600 S San Pedro St 600 S. San Pedro St.	Apartments	303 du	730	129
38	Hill Street Mixed-Use 920 S. Hill St.	Apartments	239 du	576	102
40	655 S San Pedro Street Residential 655 S. San Pedro St.	Apartments	81 du	195	35
41	Broadway Palace 948 S. Broadway	Apartments	667 du	1,607	284
		Condominiums	17 du	41	7
42	La Plaza Cultura Village 527 N. Spring St.	Apartments	345 du	831	147
44	Mixed-Use 700 W. Cesar Chavez Ave.	Apartments	300 du	723	128
46	949 S Hope Street Mixed-Use Development 949 S. Hope St.	Apartments	236 du	569	101
47	940 S Hill Mixed-Use 940 S. Hill St.	Apartments	232 du	559	99
48	Residential 350 S. Figueroa St.	Apartments	570 du	1,374	243
49	333 S Figueroa St 333 S. Figueroa St.	Apartments	224 du	540	95
		Condominiums	242 du	583	103
50 ^e	Figueroa Centre 911 S. Figueroa St.	Apartments	200 du	482	85
Related Projects Residential Service Population				37,577	6,644
Project Service Population				1,577	379
Total Residential Service Population for Related Projects and Project				39,154	7,023

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 Based on guidance from the LAPD, the analysis focuses on the increased population associated with residential uses.

Table IV.1.2-2 (Continued)
Estimated Service Population from Related Projects within Central Area

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Service Population ^c	Annual Crimes ^d
^c	Based on a rate of 2.41 persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.				
^d	The number of crimes is based on the crimes per capita rate currently observed in the Central Community Police Station service area at 0.1768 crime per capita.				
^e	Related Project No. 50 has been terminated. However, it has been retained in this related projects list because this list has been previously approved by both City Planning and LADOT (see the LADOT TIA Assessment Letter included as Appendix J.2 of this Draft EIR), and because retaining this related project provides a conservative analysis of cumulative impacts in this Draft EIR.				
Source: Eyestone Environmental, 2019.					

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, ²⁵the 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

²⁵ *Per 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).*

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.

The Project would not independently, or when combined with the related projects, directly require the development of a new or expanded police facility. Therefore, the Project would not result in a cumulatively considerable or substantial adverse physical impact associated with the provision or need for new or physically altered governmental facilities, that 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. Therefore, cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative 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.