

## **IV. Environmental Impact Analysis**

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### **F.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 related 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 15, 2019, which is included in Appendix F of this Draft EIR.

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

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

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding police protection and emergency services in the State, as well as the City of Los Angeles (City). As described below, these plans and guidelines include California Constitution Article XII, the California Vehicle Code (CVC), the Los Angeles General Plan Framework, the City of Los Angeles Charter and Administrative and Municipal Codes, and the Central City Community Plan.

##### **(1) State**

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

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be 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, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.<sup>1</sup>

*(b) California Vehicle Code*

Section 21806 of the CVC pertains to emergency vehicles responding to Code 3 incidents/calls.<sup>2</sup> This section of the CVC states the following:

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

**(2) Local**

*(a) Los Angeles General Plan 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 9 of the Framework Element specifies that every neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the

<sup>1</sup> *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, 843, 847

<sup>2</sup> A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

public safety needs of that neighborhood.<sup>3</sup> 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. The COMPSTAT system implements a multi-layer approach to police protection services through statistical and geographical information system analysis of trends in crime through its specialized crime control model. 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.

*(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:

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

- 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.

*(d) City of Los Angeles Proposition Q*

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involved the spending of \$600 million to renovate, improve, expand and construct public safety (police, fire, paramedic) facilities.<sup>4</sup> Proposition Q provided for the completion of 13 projects consisting of the construction and/or replacement of five police stations, replacement of one police station and jail, construction of two bomb squad facilities, replacement of one detention center, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of the Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities. Proposition Q also funded six additional projects based on available funding.<sup>5</sup> The LAPD Facilities Management Division coordinated with the City Bureau of Engineering Bond Programs Division on facility maintenance, repairs, construction, and renovations associated with Proposition Q.<sup>6</sup>

<sup>4</sup> City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, *City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014*.

<sup>5</sup> City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, *City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014*.

<sup>6</sup> LAPD, *Facilities Management Division*, [www.lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/6392](http://www.lapdonline.org/inside_the_lapd/content_basic_view/6392), accessed September 23, 2020.

## 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: Central Bureau, West Bureau, South Bureau, and Valley Bureau.<sup>7</sup> These four bureaus are further divided into 21 service areas, which are serviced by the LAPD's 21 community police stations.<sup>8</sup> Each geographic bureau is comprised of four to seven geographic area police stations.<sup>9</sup>

As of December 2019, the departmental staffing resources within the LAPD includes 10,033 sworn officers. Based on a total City population of 4,029,741, the LAPD citywide officer-to-resident ratio is 2.5 officers for every 1,000 residents.<sup>10,11</sup>

The Project Site is located in the Central Bureau, which covers a territory of approximately 65 square miles with a population of approximately 842,700 residents.<sup>12</sup> The Central Bureau oversees operations in the Central, Hollenbeck, Newton, Northeast and Rampart, as well as the Central Traffic Division Areas.<sup>13</sup> The Central Bureau borders Burbank, Glendale, Pasadena, South Pasadena, Alhambra, East Los Angeles, Vernon, and Huntington Park.<sup>14</sup>

### (2) LAPD Community Police Station

Within the Central Bureau, the Project Site is served by the Central Community Police Station. As shown in Figure IV.F.2-1 on page IV.F.2-6, the Central Community Police Station is located at 251 East 6th Street, approximately 0.9 mile southeast of the

<sup>7</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/contact\\_us/content\\_basic\\_view/1063](http://www.lapdonline.org/contact_us/content_basic_view/1063), accessed September 23, 2020.

<sup>8</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/contact\\_us/content\\_basic\\_view/1063](http://www.lapdonline.org/contact_us/content_basic_view/1063), accessed September 23, 2020.

<sup>9</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/contact\\_us/content\\_basic\\_view/1063](http://www.lapdonline.org/contact_us/content_basic_view/1063), accessed September 23, 2020.

<sup>10</sup> LAPD, *COMPSTAT Citywide Profile 12/01/19–12/28/19*.

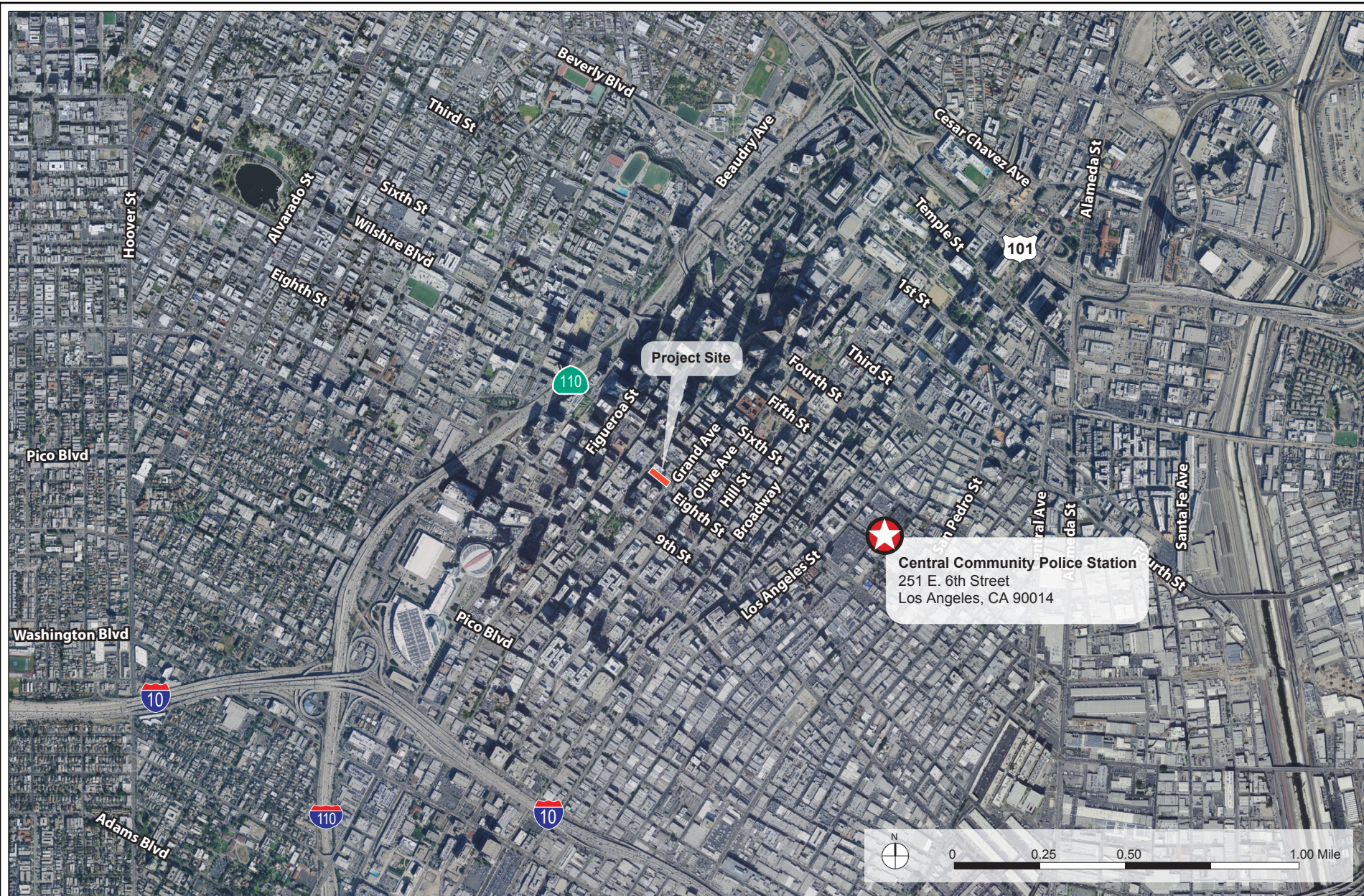
<sup>11</sup>  $10,033 \text{ officers} \div 4,029,741 \text{ residents} = 0.0025 \text{ officer per resident} = 2.5 \text{ officers per } 1,000 \text{ residents}$ .

<sup>12</sup> LAPD, *About Central Bureau*, [www.lapdonline.org/central\\_bureau/content\\_basic\\_view/1908](http://www.lapdonline.org/central_bureau/content_basic_view/1908), accessed September 23, 2020.

<sup>13</sup> LAPD, *About Central Bureau*, [www.lapdonline.org/central\\_bureau/content\\_basic\\_view/1908](http://www.lapdonline.org/central_bureau/content_basic_view/1908), accessed September 23, 2020.

<sup>14</sup> LAPD, *About Central Bureau*, [www.lapdonline.org/central\\_bureau/content\\_basic\\_view/1908](http://www.lapdonline.org/central_bureau/content_basic_view/1908), accessed September 23, 2020.





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



Project Site. Without traffic, the vehicle trip between the Project Site and the police station is five minutes.<sup>15</sup> In total, the Central Community Police Station service area (Central Area) covers approximately 4.5 square miles and consists of 52 Reporting Districts. The boundaries for Central Area are Stadium Way, Pasadena Freeway to the north, Washington Boulevard, 7th Street to the south, Los Angeles River to the east, and the Harbor Freeway to the west. The area includes the downtown communities of Chinatown, Little Tokyo, South Park, Central City East, Historic Core, Artists Lofts, Olvera Street, the Financial District, the Jewelry District, the Convention Center, and the Fashion District.<sup>16</sup> In 2018, the average response time to emergency calls for service in the Central Area was 2.8 minutes, and the average response time for non-emergency calls was 19.6 minutes.<sup>17</sup>

Based on data made available by the LAPD Community Relationship Division, the Central Area includes a service population of approximately 40,000 persons and is staffed by approximately 370 sworn officers and 30 civilian support staff.<sup>18</sup> As such, the Central Area officer to resident ratio is approximately 9.3 officers per 1,000 residents.<sup>19,20</sup> Thus, the officer-to-resident ratio is substantially higher than the citywide ratio of 2.5 officers per 1,000 residents.

### (3) LAPD Crime Statistics

Table IV.F.2-1 on page IV.F.2-8 provides a comparison of the Central Area and citywide data regarding Part I crimes reported by the LAPD based on only residential populations. As shown therein, based on COMPSTAT data for the year 2019, approximately 7,726 crimes were reported within the Central Area, and 120,828 crimes were reported citywide. Based on the residential service population of the Central Community Police Station, approximately 124 crimes per 1,000 residents (0.124 crime per

<sup>15</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, July 15, 2019. See Appendix F of this Draft EIR.

<sup>16</sup> LAPD, About Central Area, Central Community Police Station, [www.lapdonline.org/central\\_community\\_police\\_station/content\\_basic\\_view/1681](http://www.lapdonline.org/central_community_police_station/content_basic_view/1681), accessed September 23, 2020.

<sup>17</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, July 15, 2019. See Appendix F of this Draft EIR.

<sup>18</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, July 15, 2019. See Appendix F of this Draft EIR.

<sup>19</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, July 15, 2019. See Appendix F of this Draft EIR.

<sup>20</sup>  $370 \text{ officers} \div 40,000 \text{ residents} = 0.0093 \text{ officer per resident} = 9.3 \text{ officers per } 1,000 \text{ residents}$ .

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

|              | <b>Crimes</b> | <b>Population</b> | <b>Crimes per<br/>1,000 Persons</b> | <b>Crimes<br/>per Capita</b> |
|--------------|---------------|-------------------|-------------------------------------|------------------------------|
| Central Area | 7,726         | 40,000            | 193                                 | 0.193                        |
| Citywide     | 120,828       | 4,029,741         | 30.0                                | 0.0300                       |

*Source: LAPD, COMPSTAT Unit, COMPSTAT Central Area Profile 12/01/19–12/28/19; LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile, 12/01/19–12/28/19. Please note that the written correspondence from LAPD dated July 15, 2019, provided data for the years 2016, 2017, and 2018. To provide more recent data, this DEIR section references data from the year 2019 that are obtained from LAPD's COMPSTAT records.*

capita) were reported in the Central Area,<sup>21</sup> and 30.0 crimes per 1,000 residents (0.0300 crime per capita) were experienced citywide.<sup>22</sup>

Based on the number of sworn officers staffing the Central Community Police Station (370 sworn officers), the 2019 ratio of crimes per officer was approximately 21 crimes per officer.<sup>23</sup> In comparison, the citywide (10,033 sworn officers) ratio is 12 crimes per officer.<sup>24</sup> As a result, the Central Area has a higher crime-per-officer ratio when compared to the citywide ratio.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (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.***

<sup>21</sup>  $7,726 \text{ crimes} \div 40,000 \text{ residents} = 0.193 \text{ crime per resident} = 193 \text{ crimes per } 1,000 \text{ residents.}$

<sup>22</sup>  $120,828 \text{ crimes} \div 4,029,741 \text{ residents} = 0.0300 \text{ crime per resident} = 30.0 \text{ crimes per } 1,000 \text{ residents.}$

<sup>23</sup>  $7,726 \text{ crimes} \div 370 \text{ officers} = 21 \text{ crimes per officer.}$

<sup>24</sup>  $120,828 \text{ crimes} \div 10,033 \text{ officers} = 12 \text{ crimes per officer.}$



In assessing impacts related to police protection services in this section, the City uses Appendix G as the thresholds of significance. The factors and consideration identified below from the *L.A. CEQA Thresholds Guide* are used where applicable and relevant to assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate police protection:

- 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, result in the need for 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 data associated with the police station serving the Project Site and citywide services, including the ratio of crimes to residents and the ratio of sworn police officers to residents. In consideration of the above factors, a determination is made as to whether the LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAPD was consulted and its responses were incorporated regarding 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 services in and of itself is not a CEQA impact, but rather a social and/or economic impact.<sup>25</sup> To the extent a project generates a demand for additional police services that results in the need to construct new

<sup>25</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact needs to be evaluated within the project EIR and mitigated (if feasible), if found to be significant. The ultimate determination of whether a significant impact to the environment related to police services would result from a project is determined by whether construction of new or expanded police facilities is reasonably foreseeable as a direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of police facilities in the Project area. In the event that the City determines that expanded or new police 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 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 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:** During construction, the Project applicant will implement appropriate 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 (e.g., nighttime hours, weekends, and holidays) will also be provided. During construction activities, the Contractor will document the security measures; and the documentation would be made available to the Construction Monitor).

**Project Design Feature POL-PDF-2:** During operation, the Project will include access controls in the forms of private on-site security, a closed circuit security camera system, and keycard entry for the residential building and the residential parking areas.

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

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

**Project Design Feature POL-PDF-5:** The Project entrances to, and exits from, buildings, open spaces around buildings, and pedestrian walkways

will be designed, to the extent practicable, to be open and in view of surrounding sites.

**Project Design Feature POL-PDF-6:** Prior to the issuance of a building permit, the Project Applicant will submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

**Project Design Feature POL-PDF-7:** Prior to the issuance of a building permit, the Project Applicant will consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project.

## 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*

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, 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. 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.

Project construction activities could also potentially affect LAPD response due to reduced capacities of adjacent streets. As discussed in Section IV.G, 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 would require the following: closure of the right turn lane and bike lane adjacent to the Project Site along Grand Avenue; closure of up to eight feet of the curb lane, relocation of two bus stops

along 8th Street, removal of one on-street parking space, and closure of the sidewalk and right-turn lane along 8th Street; and closure of up to eight feet of the curb lane on Hope Street on occasion as needed, which would require the temporary removal of two on-street parking spaces on Hope Street. However, as discussed in Section IV.G, Transportation, of this Draft EIR, a Construction Traffic Management Plan and a Worksite Traffic Control Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.G, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. The plans would be prepared by the Project Applicant for approval by LADOT prior to the issuance of any demolition or building permits and would provide a detour plan, haul routes, and a staging plan. In addition, the plans would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. Furthermore, construction-related traffic generated by the Project would not significantly affect 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, described above.

**Based on the above analysis, 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. As discussed in Section II, Project Description, of this Draft EIR, the Project proposes 580 residential dwelling units and up to 7,499 square feet of ground floor commercial/retail/restaurant space. As shown in Table IV.F.2-2 on page IV.F.2-13, the Project would generate approximately 1,428 persons, including 1,398 residents.<sup>26</sup>

<sup>26</sup> The residential service population estimate is based on a 2.41 persons per household rate for multi-family units based on the 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. The non-residential service population estimate is based on the 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use provided by the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

*(Footnote continued on next page)*



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

| <b>Land Use</b>   | <b>Units</b> | <b>Conversion Factor<sup>a</sup></b> | <b>Total Police Service Population</b> |
|---|--------------|--------------------------------------|--|
| <b>Existing</b>   |              |                                      |  |
| Parking Structure and Lot   | 36,178 sf    | N/A                                  | 0                                      |
| <b>Proposed</b>   |              |                                      |  |
| Residential Units   | 580 du       | 2.41 persons/du                      | 1,398                                  |
| Commercial/Retail/Restaurant  | 7,499 sf     | 0.004 emp/sf                         | 30                                     |
| <i>Subtotal Proposed</i>  |              |                                      | <i>1,428</i>                           |
| <b>Project Net Police Service Population (Proposed – Existing)</b>  |              |                                      | <b>1,428 Total (1,398 Residents)</b>   |
| <p><i>du = dwelling units</i><br/> <i>N/A = Not Applicable</i><br/> <i>sf = square feet</i><br/> <sup>a</sup> <i>The residential service population estimate is based on a 2.41 persons per household rate for multi-family units based on the 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. The non-residential service population estimate is based on the 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use provided by the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.</i><br/> <i>Source: Eyestone Environmental, 2020.</i></p> |              |                                      |  |

As discussed above, the Central Area, in which the Project Site is located, is served by the Central Community Police Station located approximately 0.9 miles southeast of the Project Site and is staffed by 370 sworn officers and a 30-person civilian support staff. The Project’s residential service population of up to 1,398 residents would increase the existing police service population of the Central Community Police Station from 40,000 persons to up to 41,398 persons. With the increase in the police service population, the officer-to-resident ratio for the Central Area would be reduced from approximately 9.3 officers per 1,000 residents to approximately 8.9 officers per 1,000 residents,<sup>27</sup> 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.

*For informational purposes only, based on a 2.41 persons per household rate for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates, the Project’s 580 residential units would introduce approximately 1,398 new residents. Based on employee generation rates provided by the City of Los Angeles VMT Calculator Documentation Guide, May 2020, the proposed 7,499 square feet of commercial/retail/restaurant uses would generate approximately 30 employees.*

<sup>27</sup>  $370 \text{ officers} \div 41,398 \text{ residents} = 0.0089 \text{ officer per resident} = 8.9 \text{ officers per } 1,000 \text{ residents}$

As provided above in Project Design Features POL-PDF-2 through POL-PDF-5, the Project would include several 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 private on-site security, a closed circuit security camera system, and keycard entry for residential areas. In addition, the Project would provide lighting of building entries 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. Project Design Feature POL-PDF-4 would provide for sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. Furthermore, Project Design Feature POL-PDF-5 would require the Project to design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. As specified in Project Design Feature POL-PDF-6, prior to the issuance of a building permit, the Project Applicant would submit a diagram of the Project Site to the LAPD Central Area Commanding Officer that includes access routes and any additional information that might facilitate police response. Furthermore, pursuant to Project Design Feature POL-PDF-7, prior to the issuance of a building permit the Project applicant would consult with the LAPD Community Outreach and Development Division regarding the incorporation of crime prevention features appropriate for the Project. 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.<sup>28</sup> 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. As such, the Project's design features would also provide security for the commercial/retail/restaurant uses and its estimated 30 employees (as shown in Table IV.F.2-2 on page IV.F.2-13).

The Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Project-related traffic would have the potential to affect emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic congestion. As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided on 8th Street, Hope Street, and Grand Avenue. The Project would not 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. 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

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<sup>28</sup> *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

**Based on the above analysis, 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 with regard 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 would 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 2025 (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 74 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 74 is a conservative assumption, as some of the related projects may not be built out by 2025, may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 74 are fully built out by 2025, unless otherwise noted. As also discussed in Section III, Environmental Setting, of this Draft EIR, the City Planning Department is currently updating the Central City Community Plan in conjunction with the Central City North Community Plan in a combined planning process often referred to as the DTLA 2040 Plan. The DTLA 2040 Plan, which once adopted, will be a long-range plan designed to accommodate growth in Central City until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2025, well before the DTLA 2040 Plan's horizon year. Moreover, 2025 is a similar projected buildout year as many of the related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related

projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the DTLA 2040 Plan upon its adoption.

Of the 74 related projects, 67 related projects fall within the boundaries of the Central Area and are served by the Central Community Police Station.

*(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. Due to the proximity to the Project Site, should Project construction occur concurrently with related projects, specific coordination among these multiple construction sites would be required and implemented through the Project's construction management plan, 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 also 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 affect LAPD response within the Project Site vicinity as drivers of police vehicles have the ability to avoid traffic, pursuant to CVC Section 21806.

**Therefore, during construction, the Project's contribution to cumulative police protection impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, would not be cumulatively considerable, and cumulative impacts would be less than significant.**

*(b) Operation*

As shown in Table IV.F.2-3 on page IV.F.2-17, based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*, growth from the related projects that fall within the boundaries of the Central Area is estimated to result in a total police service population of approximately 66,101 persons, including 52,714 permanent residents. It is noted that the estimated number of residents associated with related projects is conservative because the estimates do not account for the removal of existing uses and their associated existing residential populations resulting from the development of the related projects.

As described above, the Project would contribute to the cumulative increase by generating a maximum net residential service population of approximately 1,398 residents. As such, the related projects' residential population of 52,714 plus the Project's 1,398 new



**Table IV.F.2-3  
Estimated Service Population from Related Projects within Central Area**

| No. <sup>a</sup> | Project/Address   | Land Use/Description               | Size      | Conversion Factor <sup>b</sup> | Estimated Service Population | Crimes <sup>c</sup> |
|------------------|---|------------------------------------|-----------|--------------------------------|------------------------------|---------------------|
| 1                | 1247 S. Grand Ave.  | Apartments                         | 115 du    | 2.41                           | 277                          | 53                  |
|                  |   | Commercial                         | 4,610 sf  | 0.004                          | 18                           |                     |
| 2                | 820 S. Olive St.  | Apartments                         | 589 du    | 2.41                           | 1,419                        | 274                 |
|                  |   | Retail                             | 4,500 sf  | 0.002                          | 9                            |                     |
| 3                | DTLA South Park—Site 1<br>1120 S. Grand Ave.                          | High-Rise Apartments               | 536 du    | 2.41                           | 1,292                        | 249                 |
|                  |   | Commercial/Retail                  | 14,061 sf | 0.004                          | 56                           |                     |
| 4                | Mixed-Use (Herald Examiner)<br>146 W. 11th St.<br>(11th St./Broadway) | Apartments                         | 391 du    | 2.41                           | 942                          | 182                 |
|                  |   | Office                             | 39,725 sf | 0.004                          | 159                          |                     |
|                  |   | Retail                             | 49,000 sf | 0.002                          | 98                           |                     |
| 5                | 11th & Hill Project<br>1111 S. Hill St.                               | Condominium                        | 528 du    | 2.41                           | 1,272                        | 245                 |
|                  |   | High-Turnover Restaurant           | 4,568 sf  | 0.004                          | 18                           |                     |
|                  |   | Fast-Food Restaurant               | 1,523 sf  | 0.004                          | 6                            |                     |
| 6                | Park/Fifth Project<br>427 W. 5th St.                                  | Apartments                         | 615 du    | 2.41                           | 1,482                        | 286                 |
|                  |   | Commercial                         | 16,968 sf | 0.004                          | 68                           |                     |
| 7                | 955 S. Broadway   | Apartments                         | 163 du    | 2.41                           | 393                          | 76                  |
|                  |   | Retail                             | 6,406 sf  | 0.002                          | 13                           |                     |
| 8                | SB OMEGA<br>601 S. Main St.   | High-Rise Condo                    | 452 du    | 2.41                           | 1,089                        | 210                 |
|                  |   | Retail                             | 25,000 sf | 0.002                          | 50                           |                     |
| 9                | 920 S. Hill St.   | Apartments                         | 239 du    | 2.41                           | 576                          | 111                 |
|                  |   | Condominiums                       | 4 du      | 2.41                           | 10                           | 2                   |
|                  |   | Commercial                         | 5,671 sf  | 0.004                          | 23                           |                     |
| 10               | 8th & Figueroa<br>744 S. Figueroa St.                                 | Apartments                         | 438 du    | 2.41                           | 1,056                        | 204                 |
|                  |   | Commercial/Retail                  | 3,750 sf  | 0.004                          | 15                           |                     |
|                  |   | Restaurant                         | 3,750 sf  | 0.004                          | 15                           |                     |
| 11               | 1133 Hope St.   | Condominiums                       | 208 du    | 2.41                           | 501                          | 97                  |
|                  |   | Restaurant                         | 5,029 sf  | 0.004                          | 20                           |                     |
| 12               | 433 S. Main St.   | Condominiums                       | 196 du    | 2.41                           | 472                          | 91                  |
|                  |   | Retail                             | 5,300 sf  | 0.002                          | 11                           |                     |
|                  |   | Restaurant                         | 900 sf    | 0.004                          | 4                            |                     |
| 13               | Spring St. Hotel<br>633 S. Spring St.                                 | Hotel                              | 176 rm    | 0.5                            | 88                           |                     |
|                  |   | Conference Space                   | 1,200 sf  | 0.004                          | 5                            |                     |
|                  |   | Restaurant                         | 8,400 sf  | 0.004                          | 34                           |                     |
|                  |   | Bar                                | 5,290 sf  | 0.004                          | 21                           |                     |
| 14               | 928 S. Broadway   | Apartments                         | 662 du    | 2.41                           | 1,595                        | 308                 |
|                  |   | Retail                             | 47,000 sf | 0.002                          | 94                           |                     |
|                  |   | Live/Work <sup>d</sup> (11,000 sf) | 11 du     | 2.41                           | 27                           | 5                   |
|                  |   | Office                             | 34,824 sf | 0.004                          | 139                          |                     |
| 15               | 1100 S. Main St.  | Apartments                         | 379 du    | 2.41                           | 913                          | 176                 |
|                  |   | Other                              | 25,810 sf | 0.004                          | 103                          |                     |
| 16               | 400 S. Broadway Mixed-Use Project<br>400-416 Broadway                 | Apartments                         | 450 du    | 2.41                           | 1,085                        | 209                 |
|                  |   | Retail                             | 7,500 sf  | 0.002                          | 15                           |                     |

**Table IV.F.2-3 (Continued)**  
**Estimated Service Population from Related Projects within Central Area**

| No. <sup>a</sup> | Project/Address   | Land Use/Description | Size      | Conversion Factor <sup>b</sup> | Estimated Service Population | Crimes <sup>c</sup> |
|------------------|---|----------------------|-----------|--------------------------------|------------------------------|---------------------|
| 17               | 737 S. Spring St.   | Apartments           | 320 du    | 2.41                           | 771                          | 149                 |
|                  |   | Pharmacy             | 25,000 sf | 0.002                          | 50                           |                     |
| 18               | Foreman and Clark Building<br>400, 402 W. 7th St.; 701, 715 S. Hill St. | Apartments           | 165 du    | 2.41                           | 398                          | 77                  |
|                  |   | Bar                  | 11,902 sf | 0.004                          | 48                           |                     |
|                  |   | Restaurant           | 14,032 sf | 0.004                          | 56                           |                     |
| 19               | 649 S. Wall St.   | Apartments           | 55 du     | 2.41                           | 133                          | 26                  |
|                  |   | Clinic               | 25,000 sf | 0.003                          | 75                           |                     |
| 20               | 732 S. Spring St.   | Apartments           | 400 du    | 2.41                           | 964                          | 186                 |
|                  |   | Pharmacy/Drug Store  | 15,000 sf | 0.002                          | 30                           |                     |
| 21               | 340 S. Hill St.   | Apartments           | 428 du    | 2.41                           | 1,031                        | 199                 |
|                  |   | Quality Restaurant   | 2,630 sf  | 0.004                          | 11                           |                     |
|                  |   | Office               | 2,980 sf  | 0.004                          | 12                           |                     |
| 22               | 940 S. Hill St.   | Apartments           | 232 du    | 2.41                           | 559                          | 108                 |
|                  |   | Retail               | 14,000 sf | 0.002                          | 28                           |                     |
| 23               | Apex Phase II<br>700 W. 9th St.   | Condominiums         | 341 du    | 2.41                           | 822                          | 159                 |
|                  |   | Retail               | 11,687 sf | 0.002                          | 23                           |                     |
| 24               | Alexan South Broadway<br>850 S. Hill St.                                | Apartments           | 305 du    | 2.41                           | 735                          | 142                 |
|                  |   | Restaurant           | 3,500 sf  | 0.004                          | 14                           |                     |
|                  |   | Retail               | 3,499 sf  | 0.002                          | 7                            |                     |
| 25               | Grand Residence<br>1229 S. Grand Ave.                                   | Condominiums         | 161 du    | 2.41                           | 388                          | 75                  |
|                  |   | Restaurant           | 3,000 sf  | 0.004                          | 12                           |                     |
| 26               | Southern California Flower Market Project<br>755 S. Wall St.            | Apartments           | 323 du    | 2.41                           | 778                          | 150                 |
|                  |   | Office               | 64,363 sf | 0.004                          | 257                          |                     |
|                  |   | Retail               | 4,385 sf  | 0.002                          | 9                            |                     |
|                  |   | Wholesale/Storage    | 63,785 sf | 0.00033                        | 21                           |                     |
|                  |   | Food/Beverage Space  | 13,420 sf | 0.004                          | 54                           |                     |
|                  |   | Event Space          | 10,226 sf | 0.004                          | 41                           |                     |
| 27               | Proper Hotel<br>1106 S. Broadway  | Hotel                | 148 rm    | 0.5                            | 74                           |                     |
|                  |   | Restaurant           | 17,452 sf | 0.004                          | 70                           |                     |
| 28               | Fashion District Tower<br>222 E. 7th St., 701 Maple St.                 | Apartment            | 452 du    | 2.41                           | 1,089                        | 210                 |
|                  |   | Retail               | 6,801 sf  | 0.002                          | 14                           |                     |
|                  |   | Restaurant           | 6,802 sf  | 0.004                          | 27                           |                     |
| 29               | 5th & Hill Center<br>333 W. 5th St.                                     | Condominiums         | 100 du    | 2.41                           | 241                          | 47                  |
|                  |   | Hotel                | 200 rm    | 0.5                            | 100                          |                     |
|                  |   | Restaurant           | 27,500 sf | 0.004                          | 110                          |                     |
|                  |   | Meeting Rooms        | 4,500 sf  | 0.004                          | 18                           |                     |
| 30               | 845 S. Olive St.  | Apartments           | 208 du    | 2.41                           | 501                          | 97                  |
|                  |   | Retail               | 810 sf    | 0.002                          | 2                            |                     |
|                  |   | Other                | 1,620 sf  | 0.004                          | 6                            |                     |
| 31               | 755 S. Los Angeles St.  | Retail               | 16,700 sf | 0.002                          | 33                           |                     |
|                  |   | Office               | 60,200 sf | 0.004                          | 241                          |                     |
|                  |   | Restaurant           | 27,000 sf | 0.004                          | 108                          |                     |

**Table IV.F.2-3 (Continued)**  
**Estimated Service Population from Related Projects within Central Area**

| No. <sup>a</sup> | Project/Address  | Land Use/Description | Size        | Conversion Factor <sup>b</sup> | Estimated Service Population | Crimes <sup>c</sup> |
|------------------|--|----------------------|-------------|--------------------------------|------------------------------|---------------------|
| 32               | 1000 S. Hill St.   | Apartments           | 700 du      | 2.41                           | 1,687                        | 326                 |
|                  |  | Retail               | 7,000 sf    | 0.002                          | 14                           |                     |
|                  |  | Restaurant           | 8,000 sf    | 0.004                          | 32                           |                     |
| 33               | 888 S. Hope St.  | Apartments           | 526 du      | 2.41                           | 1,268                        | 245                 |
| 34               | Harris Building Office Conversion<br>11th St. & Main St.; 110 11th St.                   | Retail               | 5,435 sf    | 0.002                          | 11                           |                     |
| 35               | Variety Arts Project<br>940 S. Figueroa St.  | Theater              | 1,942 seats | 0.02                           | 39                           |                     |
|                  |  | Restaurant           | 10,056 sf   | 0.004                          | 40                           |                     |
|                  |  | Bar                  | 5,119 sf    | 0.004                          | 20                           |                     |
| 36               | 1201 S. Grand Ave.   | Condominium          | 312 du      | 2.41                           | 752                          | 145                 |
|                  |  | Retail               | 7,100 sf    | 0.002                          | 14                           |                     |
| 37               | Metropolis Mixed-Use<br>851 and 899 S. Francisco St. (8th St./Francisco St.)             | Condominium          | 698 du      | 2.41                           | 1,682                        | 325                 |
|                  |  | Retail               | 65,000 sf   | 0.002                          | 130                          |                     |
| 38               | 1027 W. Wilshire Blvd.<br>(Wilshire St./Paul St.)  | Condominium          | 402 du      | 2.41                           | 969                          | 187                 |
|                  |  | Retail               | 4,728 sf    | 0.002                          | 9                            |                     |
| 39               | LASED Entertainment District<br>(Excluding development to date)<br>Figueroa St./11th St. | Residential          | 1,264 du    | 2.41                           | 3,046                        | 588                 |
|                  |  | Educational          | 95,706 sf   | 0.004                          | 383                          |                     |
|                  |  | Retail               | 138,583 sf  | 0.002                          | 277                          |                     |
|                  |  | Restaurant           | 70,000 sf   | 0.004                          | 280                          |                     |
|                  |  | Health Club          | 4,062 sf    | 0.001                          | 4                            |                     |
|                  |  | Sport Bar/Night Club | 14,409 sf   | 0.004                          | 58                           |                     |
|                  |  | Hotel                | 183 rm      | 0.5                            | 92                           |                     |
| 40               | 1212 S. Flower St.   | Apartments           | 730 du      | 2.41                           | 1,759                        | 339                 |
|                  |  | Retail/Restaurant    | 10,500 sf   | 0.004                          | 42                           |                     |
|                  |  | Office               | 70,465 sf   | 0.004                          | 282                          |                     |
| 47               | LUXE Hotel<br>1020 S. Figueroa St.   | Condominiums         | 650 du      | 2.41                           | 1,567                        | 302                 |
|                  |  | Hotel                | 300 rm      | 0.5                            | 150                          |                     |
|                  |  | Restaurant           | 40,000 sf   | 0.004                          | 160                          |                     |
|                  |  | Retail               | 40,000 sf   | 0.002                          | 80                           |                     |
| 48               | 945 W. 8th St.   | Condominiums         | 781 du      | 2.41                           | 1,882                        | 363                 |
|                  |  | Retail               | 6,700 sf    | 0.002                          | 13                           |                     |
| 49               | 926 W. James M. Wood Blvd.   | Hotel                | 247 rm      | 0.5                            | 124                          |                     |
|                  |  | Restaurant/Bar       | 1,821 sf    | 0.004                          | 7                            |                     |
| 50               | 1045 S. Olive St.  | Apartments           | 794 du      | 2.41                           | 1,914                        | 369                 |
|                  |  | Restaurant           | 12,504 sf   | 0.004                          | 50                           |                     |
| 51               | 1001 W. Olympic Blvd.,<br>1015 W. Olympic Blvd.  | Apartments           | 879 du      | 2.41                           | 2,118                        | 409                 |
|                  |  | Retail               | 20,000 sf   | 0.002                          | 40                           |                     |
|                  |  | Restaurant           | 20,000 sf   | 0.004                          | 80                           |                     |
|                  |  | Hotel                | 1,000 rm    | 0.5                            | 500                          |                     |
| 52               | 1018 W. Ingraham St.   | Apartments           | 37 du       | 2.41                           | 89                           | 17                  |
|                  |  | Retail               | 1,890 sf    | 0.002                          | 4                            |                     |

**Table IV.F.2-3 (Continued)**  
**Estimated Service Population from Related Projects within Central Area**

| No. <sup>a</sup> | Project/Address                               | Land Use/Description                    | Size      | Conversion Factor <sup>b</sup> | Estimated Service Population | Crimes <sup>c</sup> |
|------------------|---|---|-----------|--------------------------------|------------------------------|---------------------|
| 53               | Olympic Tower Project<br>815 W. Olympic Blvd. | Hotel                                   | 373 rm    | 0.5                            | 187                          |                     |
|                  |   | Condominiums                            | 374 du    | 2.41                           | 901                          | 174                 |
|                  |   | Retail                                  | 65,074 sf | 0.002                          | 130                          |                     |
|                  |   | Conference Center                       | 10,801 sf | 0.004                          | 43                           |                     |
|                  |   | Office                                  | 33,498 sf | 0.004                          | 134                          |                     |
| 54               | 361 S. Spring St.                             | Hotel                                   | 315 rm    | 0.5                            | 158                          |                     |
|                  |   | Meeting Rooms                           | 2,000 sf  | 0.004                          | 8                            |                     |
| 55               | Figueroa Centre<br>911 S. Figueroa St.        | Condominiums                            | 200 du    | 2.41                           | 482                          | 93                  |
|                  |   | Hotel                                   | 220 rm    | 0.5                            | 110                          |                     |
|                  |   | Retail                                  | 29,080 sf | 0.002                          | 58                           |                     |
|                  |   | Restaurant                              | 20,000 sf | 0.004                          | 80                           |                     |
|                  |   | Office                                  | 15,000 sf | 0.004                          | 60                           |                     |
|                  |   | Private School                          | 200 stu   | 0.15                           | 30                           |                     |
|                  |   | Meeting Rooms                           | 48,000 sf | 0.004                          | 192                          |                     |
| 56               | 124 E. Olympic Blvd.                          | Hotel                                   | 149 rm    | 0.5                            | 75                           |                     |
|                  |   | Other                                   | 6,716 sf  | 0.004                          | 27                           |                     |
| 57               | 949 S. Hope St.                               | Apartments                              | 236 du    | 2.41                           | 569                          | 110                 |
|                  |   | Restaurant                              | 10,010 sf | 0.004                          | 40                           |                     |
| 58               | 1138 S. Broadway                              | Hotel                                   | 139 rm    | 0.5                            | 70                           |                     |
|                  |   | Restaurant/Bar <sup>e</sup> (125 seats) | 3,125 sf  | 0.004                          | 13                           |                     |
|                  |   | Rooftop Bar <sup>e</sup> (200 seats)    | 5,000 sf  | 0.004                          | 20                           |                     |
| 59               | Morrison Hotel<br>1220 S. Hope St.            | Apartments                              | 135 du    | 2.41                           | 325                          | 63                  |
|                  |   | Hotel                                   | 450 rm    | 0.5                            | 225                          |                     |
|                  |   | Bar/Lounge                              | 3,060 sf  | 0.004                          | 12                           |                     |
|                  |   | Restaurant/Retail                       | 15,891 sf | 0.004                          | 64                           |                     |
|                  |   | Hotel/Residential Lobby                 | 10,415 sf | 0.004                          | 42                           |                     |
|                  |   | Event/Meeting Space                     | 14,052 sf | 0.004                          | 56                           |                     |
|                  |   | Amenities                               | 39,199 sf | 0.004                          | 157                          |                     |
| 60               | 350 S. Figueroa St.                           | Apartments                              | 570 du    | 2.41                           | 1,374                        | 265                 |
| 61               | DTLA South Park—Site 2<br>1100 S. Olive St.   | Apartments                              | 713 du    | 2.41                           | 1,718                        | 332                 |
|                  |   | Commercial                              | 7,125 sf  | 0.004                          | 29                           |                     |
|                  |   | Restaurant                              | 7,125 sf  | 0.004                          | 29                           |                     |
| 62               | DTLA South Park—Site 3<br>1120 S. Olive St.   | Apartments                              | 537 du    | 2.41                           | 1,294                        | 250                 |
|                  |   | Commercial                              | 3,794 sf  | 0.004                          | 15                           |                     |
|                  |   | Restaurant                              | 3,794 sf  | 0.004                          | 15                           |                     |
| 63               | 1155 S. Olive St.                             | Hotel                                   | 258 rm    | 0.5                            | 129                          |                     |
|                  |   | Retail                                  | 1,896 sf  | 0.002                          | 4                            |                     |
|                  |   | Restaurant                              | 2,722 sf  | 0.004                          | 11                           |                     |



**Table IV.F.2-3 (Continued)**  
**Estimated Service Population from Related Projects within Central Area**

| <b>No.<sup>a</sup></b>   | <b>Project/Address</b>                         | <b>Land Use/Description</b> | <b>Size</b> | <b>Conversion Factor<sup>b</sup></b> | <b>Estimated Service Population</b> | <b>Crimes<sup>c</sup></b> |
|--|--|-----------------------------|-------------|--------------------------------------|-------------------------------------|---------------------------|
| 64   | Angels Landing<br>361 S. Hill St.              | Condominiums                | 180 du      | 2.41                                 | 434                                 | 84                        |
|  |  | Apartments                  | 261 du      | 2.41                                 | 629                                 | 121                       |
|  |  | Hotel                       | 509 rm      | 0.5                                  | 255                                 |                           |
|  |  | Charter School              | 38,977 sf   | 0.004                                | 156                                 |                           |
|  |  | Commercial                  | 36,551 sf   | 0.004                                | 146                                 |                           |
| 65   | 1030 S. Hill St.                               | High-Rise Residential       | 700 du      | 2.41                                 | 1,687                               | 326                       |
|  |  | Retail                      | 7,000 sf    | 0.002                                | 14                                  |                           |
|  |  | Restaurant                  | 8,000 sf    | 0.004                                | 32                                  |                           |
| 66   | Bunker Hill Tower<br>333 Figueroa St.          | Apartments                  | 224 du      | 2.41                                 | 540                                 | 104                       |
|  |  | Hotel                       | 599 rm      | 0.5                                  | 300                                 |                           |
|  |  | Condominiums                | 242 du      | 2.41                                 | 583                                 | 113                       |
|  |  | Amenities                   | 37,000 sf   | 0.004                                | 148                                 |                           |
|  |  | Commercial                  | 29,000 sf   | 0.004                                | 116                                 |                           |
| 68   | AEG Hotel                                      | Hotel                       | 850 rm      | 0.5                                  | 425                                 |                           |
|  |  | Meeting Rooms               | 245,249 sf  | 0.004                                | 981                                 |                           |
| 69   | Los Angeles Convention Center (LACC) Expansion | LACC Expansion              | 700,000 sf  | 0.004                                | 2,800                               |                           |
| 70   | 1036 S. Grand Ave.                             | Restaurant                  | 7,149 sf    | 0.004                                | 29                                  |                           |
| 71   | 1219 S. Hope St.                               | Hotel                       | 75 rm       | 0.5                                  | 38                                  |                           |
|  |  | Retail                      | 2,650 sf    | 0.002                                | 5                                   |                           |
| 72   | 835 W. Wilshire Blvd.                          | Drugstore                   | 11,345 sf   | 0.002                                | 23                                  |                           |
| 73   | 321 W. Olympic Blvd.                           | Apartments                  | 263 du      | 2.41                                 | 634                                 | 122                       |
|  |  | Commercial                  | 14,500 sf   | 0.004                                | 58                                  |                           |
| 74   | 408 W. Spring St.                              | Hotel                       | 140 rm      | 0.5                                  | 70                                  |                           |
| <b>Related Projects Service Population</b>   |  |                             |             |                                      | <b>66,101 per</b>                   | <b>—</b>                  |
| <b>Project Service Population</b>  |  |                             |             |                                      | <b>1,428 per</b>                    | <b>—</b>                  |
| <b>Total Service Population for Related Projects and Net Project</b>   |  |                             |             |                                      | <b>67,529 per</b>                   | <b>—</b>                  |
|  |  |                             |             |                                      |                                     |                           |
| <b>Related Projects Residential Service Population</b>   |  |                             |             |                                      | <b>52,714 res</b>                   | <b>10,175 cri</b>         |
| <b>Net Project Residential Service Population</b>  |  |                             |             |                                      | <b>1,398 res</b>                    | <b>270 cri</b>            |
| <b>Total Residential Service Population for Related Projects and Net Project</b>   |  |                             |             |                                      | <b>54,112 res</b>                   | <b>10,445 cri</b>         |
| <hr/> <i>cri = crimes</i><br><i>du = dwelling units</i><br><i>per = persons</i><br><i>res = residents</i><br><i>rm = rooms</i> |  |                             |             |                                      |                                     |                           |

**Table IV.F.2-3 (Continued)**  
**Estimated Service Population from Related Projects within Central Area**

| No. <sup>a</sup>  | Project/Address | Land Use/Description | Size | Conversion Factor <sup>b</sup> | Estimated Service Population | Crimes <sup>c</sup> |
|---|-----------------|----------------------|------|--------------------------------|------------------------------|---------------------|
| <p><i>sf = square feet</i><br/> <i>stu = students</i><br/> <i>Totals may not sum due to rounding.</i><br/> <i>Related Project Nos. 41, 42, 43, 44, 45, 46, and 67 are not located within the Central Community Police Station service area. Therefore, the service population was not calculated.</i><br/> <sup>a</sup> <i>Project No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.</i><br/> <sup>b</sup> <i>Residential service population estimates are based on a 2.41 persons per household rate for multi-family units based on the 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. Non-residential service population estimates are based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, including following employee generation rates: 0.002 employee per square foot for "General Retail" land use; 0.004 employee per square foot for "General Office" land use; 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" and "Quality Restaurant" land uses; 0.5 employee per room for "Hotel" land use; 0.002 employee per square foot for "Pharmacy/Drugstore" land use; 0.001 employee per square foot for "Health Club" land use; 0.003 employee per square foot for "Medical Office" land use; 0.00033 employee per square foot for "Warehousing/Self-Storage" land use; 0.02 employee per seat for "Movie Theater" land use; and 0.15 employee per student for "Private School" land use. The City of Los Angeles VMT Calculator Documentation Guide does not provide employee generation rates for commercial, conference/event space, convention center, meeting room, sport bar/night club, lobby, amenities, charter school/educational, and other land uses per square foot. Therefore, to provide a conservative estimate with rates made available by the City of Los Angeles VMT Calculator Documentation Guide, the rate 0.004 employee per square foot is applied those uses.</i><br/> <sup>c</sup> <i>The number of crimes is based on the crimes-per-resident rate observed in the Central Community Police Station service area in 2019. Based on a service population of 40,000 for the Central Community Police Station service area and 7,726 Part I crimes committed during 2019, the crime rate is approximately 0.193 crime per resident.</i><br/> <sup>d</sup> <i>Based on the assumption that 1,000 square feet of live/work space provides approximately 1 dwelling unit (i.e., 11,000 square feet = 11 dwelling units).</i><br/> <sup>e</sup> <i>Based on the standard factor that 25 square feet provides approximately 1 seat for restaurant uses.</i><br/> <i>Source: Eyestone Environmental, 2020.</i></p> |                 |                      |      |                                |                              |                     |

residents would result in an estimated increase of 54,112 residents in the Central Area. Accordingly, the Central Area residential police service population would increase from 40,000 to 94,112 residents, which would reduce the officer-to-resident ratio from the current ratio of 9.3 officers per 1,000 residents to 3.9 officers per 1,000 residents.<sup>29</sup> However, the cumulative ratio would still remain above the Citywide average officer-to-resident ratio of 2.5 officers for every 1,000 residents.

The additional service population associated with the related projects and general growth in the Project vicinity may likewise also 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

<sup>29</sup>  $370 \text{ officers} \div 94,112 \text{ residents} = 0.0039 \text{ officer per resident} = 3.9 \text{ officers per } 1,000 \text{ residents}.$

same crimes-per-capita rate currently observed in the Central Area (0.193 crime per capita), the residential population of the Project and related projects could generate an additional 10,445 crimes per year. This degree of cumulative population growth could increase the demand for LAPD services in the Central Area. However, of the 10,445 potential crimes per year, the Project's potential incremental contribution is only 270 crimes per year. In addition, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-6 to reduce the demand for police protection services on the Project Site. Therefore, the Project's incremental impact would not be 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. As such, the security design features installed and implemented by the related projects would also provide security for proposed non-residential uses and its employees. 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.<sup>30</sup> In addition, it is anticipated that the related projects would implement project design features similar to those proposed by 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 to the Project vicinity that would generate additional traffic. Any resulting traffic congestion would have the potential to affect 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 adversely affect existing emergency response in the Central Area. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel, in accordance with CVC Section 21806.

With regard to cumulative impacts on police protection, consistent with the *City of Hayward v. Board of Trustees of California State University* ruling and the requirements

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<sup>30</sup> *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police 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 either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

**Based on the above considerations, development of 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), or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. As such, cumulative impacts on police protection services would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts with regard 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.