

4. ENVIRONMENTAL IMPACT ANALYSIS

I. PUBLIC SERVICES

2 POLICE PROTECTION

1. INTRODUCTION

This section addresses potential impacts on police services that could occur due to construction activities and operation of the proposed Project. The analysis focuses on the City of Los Angeles Police Department (LAPD) facilities that currently serve the Project Site and the ability of the LAPD to provide police protection services to the Project. The analysis is based, in part, on information provided by LAPD. This information includes statistical data regarding police protection facilities, services and response times, and is included in Appendix I-3 of this Draft EIR.¹ Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.²

2. ENVIRONMENTAL SETTING

a. Existing Conditions

The LAPD provides police protection services in the City of Los Angeles. The LAPD includes 21 community police areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. The LAPD also has a variety of specialized units including Special Operations, Special Weapons and Tactics (SWAT), Gangs and Narcotics, K-9, and the Mounted Unit.³

The Project Site is located in the LAPD's Central Bureau. The Central Bureau covers a 65 square mile area with roughly 900,000 people that includes such diverse communities as Downtown, Eagle Rock, the Garment District, MacArthur Park, Dodger Stadium, and Griffith Park.⁴ It borders Burbank, Glendale, Pasadena, and South Pasadena.⁵ The Central Bureau oversees operations in five LAPD Areas, including the Central, Hollenbeck, Newton, Northeast and Rampart Areas. The Central Bureau also oversees operations at the Central Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the Central Bureau.⁶

The Project Site is served by the Central Community Police Station, located at 251 E. 6th Street, approximately 0.95 miles northeast of the Project Site, as shown in **Figure 4.I.2-1, Location of Central Community Police Station**. The Central Community Police Station serves an approximately 4.5 square mile area (the LAPD Central Area) which includes Chinatown, Little Tokyo, South Park, Central City East, Flower Mart, Toy Town, Historic Core, Financial District, Artists Lofts, Olvera Street, Jewelry/Broadway District, Civic Center, and

¹ Captain Howard J. Leslie, Commanding Officer, Central Area, LAPD correspondence dated March 23, 2016 and Sergeant Mark Aceves, LAPD Central Area Adjutant, email correspondence, April 14, 2016 included in Appendix I-3 of this Draft EIR.

² The Los Angeles Police Department, COMPSTAT, http://www.lapdonline.org/search_results/content_basic_view/6363. Accessed April 2016.

³ Inside the LAPD, http://www.lapdonline.org/inside_the_lapd. Accessed April 2016.

⁴ LAPD, Central Bureau: http://www.lapdonline.org/central_bureau/content_basic_view/1908. Accessed April 2016.

⁵ *Ibid.*

⁶ *Ibid.*

portions of the Fashion District communities.⁷ As shown in Figure 4.1.2-1, the boundaries of the Central Area are generally the Los Angeles River to the north, Washington Boulevard and 7th Street to the south, the Metrolink Railroad tracks to the east, and the Pasadena/Harbor Freeway (I-110/SR 110) to the west. The Central Community Police Station has Central Area has 430 assigned personnel which includes Officers, Detectives and Civilians and provides service to a population of approximately 40,000 residents.⁸ When situations arise requiring increased staffing, additional officers can be called in from other LAPD community police stations. Furthermore, as with all municipal police departments in Los Angeles County, the LAPD participates in the Mutual Aid Operations Plan for Los Angeles County, a reciprocal agreement between signatory agencies including local police departments to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. According to the LAPD, there are no current plans to expand the Central Community Police Station or increase the number of personnel assigned to the Central Area.⁹

Table 4.1.2-1, Population, Officer, Crime, and Response Time Comparison, lists the population, number of sworn officers, officer/resident ratio, number of crimes, and average response times for the Central Area and Citywide. As set forth in Table 4.1.2-1 below, the officer-to-resident population ratio within the Central Area and Citywide is 1/93 and 1/398, respectively; the number of crimes per 1,000 residents within the Central Area and Citywide is 149 and 30, respectively; and the average response times by LAPD to emergency calls within the Central Area and Citywide is 4.2 minutes and 5.7 minutes, respectively. LAPD's response time standard is seven minutes.

Table 4.1.2-1

Population, Officer, Crime, and Response Time Comparison

| Service Area | Square Miles | Population | Personnel | Personnel/ Resident Ratio | Crimes | Crimes per 1,000 Residents | Average Response Time for Emergency Calls |
|-------------------------------------|---------------------|------------------------|--------------------|--|----------------------|---|--|
| Central Community Police Station | 4.5 ^a | 40,000 ^b | 430 ^c | 1/93 | 5,970 ^b | 149 | 4.2 minutes ^c |
| Citywide | 472.9 ^d | 3,931,227 ^f | 9,878 ^d | 1/398 | 116,532 ^e | 30 | 5.7 minutes ^c |

^a LAPD, Central Bureau: http://www.lapdonline.org/central_bureau. Accessed April 2016.

^b Sergeant Mark Aceves, LAPD Central Area Adjutant, email correspondence, April 14, 2016.

^c Captain Howard J. Leslie, Commanding Officer, Central Area, LAPD correspondence dated March 23, 2016.

^d Los Angeles Police Department, COMPSTAT Citywide Profile, March, 6, 2016 – April, 02, 2016. <http://assets.lapdonline.org/assets/pdf/cityprof.pdf>. Accessed April 2016.

^e LAPD Crimes and Initiatives, 2015-2016.

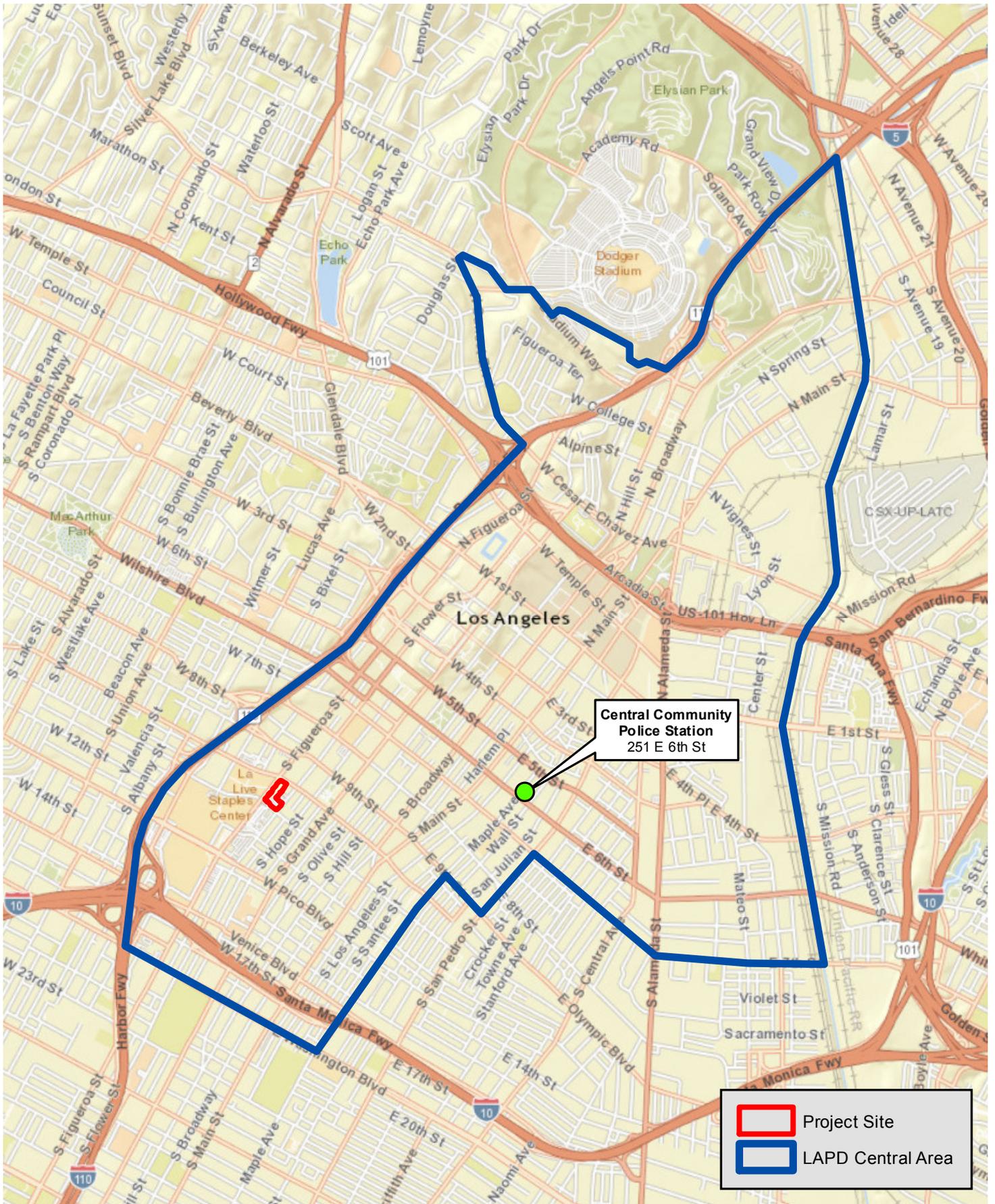
^f As reported in Table 4.H-2 in Draft EIR Section 4.H Population, Housing and Employment. The COMPSTAT Profile identified in footnote d, cites the Citywide population as 3,792,621; which was the 2010 Census population. As the number of officers and crimes as cited in in Table are tied to 2015 and 2016 data the 2016 population estimate has been used for calculating citywide officer and crime ratios.

Source: PCR Services Corporation, April 2016.

⁷ Ibid.

⁸ Captain Howard J. Leslie, Commanding Officer, Central Area, LAPD correspondence dated March 23, 2016 and included in Appendix I-3 of this Draft EIR.

⁹ Captain Howard J. Leslie, Commanding Officer, Central Area, LAPD correspondence dated March 23, 2016 and included in Appendix I-3 of this Draft EIR.



Location of Central Community Police Station

FIGURE

4.1.2-1

Source: ESRI Street Map, 2009; LAPD, Central Bureau: http://www.lapdonline.org/central_bureau. Accessed April 2016. PCR Services Corporation, 2016.

1020 S. Figueroa Street Project

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As a whole, citywide, crime decreased steadily between 2003 and 2014.¹⁰ This decrease was attributed to a number of factors, including the LAPD's decade long use of COMPSTAT which enables the LAPD to track crime trends and appropriately deploy officers, and an emphasis on crime prevention and intervention in addition to enforcement.¹¹ However, in 2015, overall crime increased in all categories, with violent crime citywide increasing by 20 percent and property crime increasing by 10 percent. LAPD's Central Area, which includes parts of downtown, skid row and Chinatown, had the highest number of violent and property crime increases in the City. Part of this increase has been attributed to increased homelessness and drug use, particularly in the skid row area; the recent approval of California Proposition 47 and AB109 which reduced penalties for certain offenses such as drug possession and minor thefts to misdemeanors; stricter reporting of aggravated assaults under the federal Uniform Crime Report system; and increased outreach to victims of domestic violence, which is traditionally an underreported crime.¹² **Table 4.1.2-2, Central Area Crime Statistics**, summarizes the crime statistics for the Central Area for 2015. As indicated therein, the total number of crimes in the Central Area totaled 5,970, with most of the crimes related to thefts and assaults.

Table 4.1.2-2

**Central Area Crime Statistics
(1/1/2015 to 1/1/2016)**

| Crime | Central Area | |
|-----------------------------|--------------|-------------|
| | Number | Percent |
| Aggravated Assault | 904 | 15% |
| Burglary/Theft from Vehicle | 913 | 15% |
| Burglary | 350 | 6% |
| Grand Theft Auto | 427 | 7% |
| Homicide | 11 | 0% |
| Rape | 129 | 2% |
| Robbery | 683 | 11% |
| Theft | 2,351 | 39% |
| Total | 5,970 | 100% |

Source: Sergeant Mark Aceves, LAPD Central Area Adjutant, email correspondence, April, 14, 2016.

In response to Citywide crime increases, the City has responded by training and deploying specially-trained officers assigned to LAPD's Metropolitan Division that are flexibly deployed to rapidly respond to crime spikes and proactively prevent crimes throughout the City; increasing the number of Domestic Abuse Response Teams (DART); expanding the Gang Reduction and Youth Development (GRYD) program to include twice as many GRYD zones that provide prevention and intervention services to at-risk youth; combining City and County efforts to reduce homelessness comprehensively by increasing available housing

¹⁰ 89.3 KPCC Southern California Public Radio, *Crime & Justice, LAPD: Crime in Los Angeles Down for the 11th Straight Year*, <http://www.scpr.org/news/2014/01/13/41574/lapd-crime-in-los-angeles-down-for-the-11th-straight>, September 3, 2015.

¹¹ *Ibid.*

¹² LAPD Statement on Crime Fighting Strategies, January, 20, 2016.

and providing additional support services; and doubling the number of specially-trained teams of police officers and mental health professionals to respond to incidents involving a mental health crisis.¹³

The Project Site lies within LAPD Reporting District (RD) 0182, which includes the area bounded by 9th Street to the north, Pico Boulevard to the south, Hill Street to the east and Figueroa Street to the west. **Table 4.1.2-3 Reporting District 0182 Crime Statistics**, provides 2015 crime statistics for RD 0182. As shown in **Table 4.1.2-3**, crime statistics for the RD 0182 area were significantly lower than the Central Area as whole, with 166 crimes reported in 2014 and 197 crimes reported in 2015. As shown in Table 4.1.2-3, the majority of crimes in the RD 0182 are property related crimes as opposed to violent crimes against persons.

Table 4.1.2-3

**Reporting District 0182 Crime Statistics
(1/1/2015 to 1/1/2016)**

| Crime | 1/1/2014-1/1/2015 | | 1/1/2015 to 1/1/2016 | |
|-----------------------------|-------------------|-------------|----------------------|-------------|
| | Number | Percent | Number | Percent |
| Aggravated Assault | 8 | 5% | 18 | 9% |
| Burglary/Theft from Vehicle | 46 | 28% | 42 | 21% |
| Burglary | 8 | 5% | 19 | 10% |
| Grand Theft Auto | 22 | 13% | 27 | 14% |
| Grand Theft Person | 3 | 2% | 5 | 3% |
| Rape | 6 | 4% | 3 | 2% |
| Robbery | 17 | 10% | 22 | 11% |
| Theft | 56 | 34% | 61 | 31% |
| Homicide | 0 | 0 | 0 | 0 |
| Total | 166 | 100% | 197 | 100% |

Source: Sergeant Mark Aceves, LAPD Central Area Adjutant, email correspondence, April, 14, 2016.

In addition to the services provided by the LAPD, additional security services in the Project area are provided by the South Park Business Improvement District (BID), a non-profit 501(c)6 public/private partnership established by City of Los Angeles Ordinance 182278 on October 2, 2012 and managed by the South Park Stakeholders Group (SPSG).¹⁴ The South Park BID covers a 32-square block area of Downtown Los Angeles bordered by Olympic Boulevard and 9th Street to the north, the Santa Monica Freeway (I-10) to the south, the Margo Street alley to the east, and the Harbor 110 Freeway to the west.¹⁵ This area was expanded eastward on January 2, 2016 to cover the additional area bordered roughly by Olympic Blvd, the alley between Main/Broadway, the I-10 and the Margo alley.¹⁶

¹³ LAPD Statement on Crime Fighting Strategies, January, 20, 2016.

¹⁴ About the BID, <http://www.southpark.la/about>. Accessed April 2016.

¹⁵ Ibid.

¹⁶ Ibid.

The BID includes a Safety Team that patrols South Park 24-hours a day, seven days a week by foot, bike, Segway, and motor vehicle, assisting the LAPD by providing help to control public street disorder, panhandling, security during special events, accompanied walk services, and property patrols, reporting suspicious activities, criminal actions and emergencies to the LAPD, and making private persons' arrests.¹⁷ The South Park BID is funded by the property owners within the District who assess themselves annually to pay for the security services as well as for street cleaning services, streetscape beautification, sidewalk repair, street tree planting, public art, homeless outreach services, and marketing.¹⁸

The Project Site is currently developed with the Luxe City Center Hotel (Luxe Hotel) and surface parking lots. The Luxe Hotel is an 112,748 sf, nine story, 100 foot tall building that includes 178 guest rooms, a main lobby, interior restaurant, an indoor/outdoor bar and lounge area, conference rooms, and an estimated 118 employees. The Luxe Hotel has security cameras installed throughout the building, and it provides private security 24-hours a day, seven days a week. On a typical day, the Luxe Hotel has one security personnel on staff, and for events, the Luxe Hotel contracts up to four security personnel per event.

b. Regulatory Framework

(1) County of Los Angeles

(a) Office of Emergency Management

The Office of Emergency Management (OEM), established by Chapter 2.68 of the County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.

The County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Formal mutual aid requests between police departments can be made under the purview of the County Sheriff's Department; however, additional informal agreements may be made directly between the police agencies. The Mutual Aid Operations Plan provides a structure of response should an emergency arise which requires immediate response by more law enforcement personnel than would be available to LAPD using all other available resources.

(2) City of Los Angeles

(a) General Plan Framework Element

The City's General Plan Framework Element (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision or strategy for long-term growth within the City and guides subsequent amendments of the City's Community Plans, Specific Plans, zoning ordinances, and other local planning programs.¹⁹ Under the General Plan Framework, primary police law

¹⁷ *Ibid.*

¹⁸ *Ibid.*

¹⁹ *City of Los Angeles General Plan, Citywide General Plan Framework Element, 1995, <http://cityplanning.lacity.org/cwd/framwk/chapters/title.htm>. Accessed April.*

enforcement services are provided by the LAPD and supplemental services are provided by the Los Angeles County Sheriff, the California Highway Patrol, the Federal Bureau of Investigation and the Drug Enforcement Administration.

Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies; however Policy 9.14.7 pertains to the development of individual projects and encourages the design of defensible spaces and use of current law enforcement technology in development. Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.²⁰

(b) Central City Community Plan

The City's 2009 Central City Community Plan, which covers the Downtown area of the City including the Project Site, contains the following police protection objectives, policies and programs applicable to the Project²¹:

- Chapter III, Land Use Policies and Programs, Government and Public Facilities, Police Protection:
 - 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 5-2.1: Promote the establishment of Police facilities and programs which provide police protection at a neighborhood level.
 - Program: Coordinate with Business Improvement District security patrols. Continue and expand bike patrols, neighborhood beats, or other community-based policing appropriate to the District.
 - 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

²⁰ City of Los Angeles General Plan, Citywide General Plan Framework Element, 1995, Chapter 9, Infrastructure and Public Services.

²¹ City of Los Angeles, Central City Community Plan, 2009. <http://planning.lacity.org/complan/pdf/CCYCPTXT.PDF>. Accessed April 2016.

and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, a reduction in calls for police service, and an increase in the quality of life.

- **Program:** Incorporate whenever possible the design guidelines contained in the City's Crime Prevention Through Environmental Design "Design Out Crime" Guidelines and published by the City Planning Department.

(c) Charter and Administrative and Municipal Codes

The law enforcement regulations, powers, and duties of the LAPD are outlined in the City Charter, Administrative Code, and Los Angeles Municipal Code (LAMC). City Charter Article V, Section 570 gives power and duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and State and federal law. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity. Section 22.240 of the Administrative Code requires the LAPD to adhere to the State standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures in regards to new development.

(d) COMPSTAT Program

In 1994, the LAPD incorporated the use of the COMPSTAT Program. The COMPSTAT Unit implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model. COMPSTAT has been shown to reduce crime occurrences in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.²²

(e) Design Out Crime/Crime Prevention through Environmental Design

The City of Los Angeles has established an initiative called "Design Out Crime," to encourage project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED.) CPTED is intended to look beyond traditional policing methods to address public safety, thus reducing the amount of police officers that would otherwise be required. CPTED provides a series of strategies and design recommendations that can be used by project planners/architects. Recommended design practices use location of activities within the project site, as well as other site features including, for example, the use of paths, lighting, entryways, and security features (locks/gates/signs) to enhance site safety. These features improve safety and reduce crime by providing visual connection/natural surveillance and discouraging criminal activity.

²² Los Angeles Police Department, *COMPSTAT Plus*, http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364. Accessed April 2016.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services; and potential need for new or expanded police facilities. The analysis presents statistical data for the Central Area and Citywide, including the ratio of crimes to residents and the ratio of officers to residents. The ratio of officers to residential population is used by LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for the Project. The Project's residential population is based on a household size of 1.63 persons per unit; the Community Plan average per the 2010 Census. The number of crimes potentially generated annually by the Project was calculated by multiplying the annual per capita crime rate in the Central Area by the Project's estimated resident population.

The Project's non-resident population was also compared to resident-generated impacts; however, the LAPD does not provide crime rates or officer service ratios for non-residential uses and does not use such ratios to measure service levels. The non-residential population is calculated using Police Service Population Conversion Factors presented in the L.A. CEQA Thresholds Guide. The calculation is based on the increase in Site activity, netting out the existing Luxe Hotel.

The analysis reviews the Project characteristics and security and/or design features for consistency with Design Out Crime recommendations, and the use of on-site and private security provisions to reduce the potential effects of the Project on the need for police services. Based on these criteria and consultation with the LAPD, a determination was made as to whether police facilities could accommodate the additional demand for police protection services resulting from the Project without the need for a new facility or the alteration of existing facilities.

b. Thresholds of Significance

Appendix G of the State *CEQA Guidelines* provides the following screening question that addresses impacts with regard to police protection service:

- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Police protection?

The *L.A. CEQA Thresholds Guide* incorporates the screening questions contained in Appendix G. In accordance with the City's thresholds, the determination of significance for impacts on police protection shall be made on a case-by-case basis, considering the following factors:

- 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;
- Whether the project includes security and/or design features that would reduce the demand for police services.

Based on these factors, the Project would have a significant impact on police protection services if it:

POL-1 Generates a demand for police facilities or services that could not be accommodated by the expected level of service available during construction or at buildout, taking into consideration the Project's security and/or design features, such that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, would be required to maintain service, construction of which would cause significant environmental impacts.

c. Project Characteristics

(1) Construction

The Project would be constructed in two phases over an approximately six year period. The Project would include security measures during construction to limit access to the active construction areas. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. Construction fencing with gated and locked entry would be installed around the perimeter of the construction site. Furthermore, a construction management plan would be implemented to ensure that emergency service providers would have adequate access to the Project Site and neighboring businesses. For further discussion of the construction management plan refer to Section 4.J, *Transportation and Traffic*, of this Draft EIR.

(2) Operation

The proposed Project would replace the existing 178-room Luxe Hotel, associated restaurant, bar, board room, and surrounding surface parking lots with a mixed-use development in three towers atop an eight level podium, four levels above ground and up to four levels subterranean, to include 650 residential condominium units, 300 hotel rooms (an increase of 122 rooms), 80,000 sf of retail/ restaurant uses, and both structured and surface parking. This development would increase the on-site service population with new residents and non-resident site populations. The estimated non-resident service population associated with the additional 122 hotel rooms and 80,000 sf of commercial uses would be 423 people.²³

The Project would provide an extensive security program, 24 hours per day/7 days per week, to ensure the safety of residents, hotel guests and other visitors to the Project Site. The Project would incorporate CPTED strategies in design and planning, as well as active security features. In each tower and in the Podium areas, state-of-the-art security technology would be employed. These features would include comprehensive coverage and monitoring of key areas through Close Circuit Television systems (CCTV). Access to non-public

²³ The number of hotel guests and retail/restaurant customers was estimated based on the Police Service Population Conversion Factors of 1.5 guests per hotel room and 3 customers per 1,000 sf of restaurant/retail space from the L.A. CEQA Thresholds Guide (2006).

areas of the Project would be restricted by electronically controlled and locking access cards. Approximately four to five security guards would be hired as part of the Project. Full time 24-hour, security would be provided including security/concierge desks in each residential and hotel tower along with roving patrols. Security personnel duties would include but not be limited to assisting residents and visitors with Project Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. Initial alarms such as intruder alarms or duress alarms would be the responsibility of site security personnel as first responders. Access to parking areas would be secured. Valet parking would be provided for hotel guests. During special events that may occur in the public plaza, additional security personnel would be provided when warranted depending on the size, time and nature of the events.

d. Project Impacts

Threshold POL-1: The Project would have a significant impact on police protection services if it generates a demand for police facilities or services that could not be accommodated by the expected level of service available during construction or at buildout, taking into consideration the Project's security and/or design features, such that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, would be required to maintain service, construction of which would cause significant environmental impacts.

(1) Construction Impacts

Impact Statement POL-1: *Impacts on emergency access and police protection services during construction would be less than significant. Construction activities would be carried out pursuant to a construction management plan that would address construction-related traffic and security measures would be incorporated during construction including controlled access to the Project Site, private security, and security lighting.*

During construction, equipment, building materials, vehicles, and temporary offices, would be temporarily located on the Project Site, which could be subject to theft or vandalism, potentially requiring LAPD involvement. These potential impacts would be addressed through a number of security measures to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. Private security personnel would monitor vehicle and pedestrian access to the construction areas and patrol the Project Site. Construction fencing with gated and locked entry would be installed around the perimeter of the construction site. The majority of the construction staging would occur within the Project Site, limiting potential conflicts with traffic on local streets. Potential effects on adjacent accessibility would be reduced with flagging and traffic control personnel. Additionally, construction workers generally start and end their work days in advance of peak traffic hours, thus reducing their potential effect on traffic and emergency responses. As described in Section 4.J, *Transportation and Traffic*, a construction management plan subject to review and approval by the City and Los Angeles Department of Transportation (LADOT) is required as a Project Design Feature. The construction management plan would include provisions for traffic controls such as identifying the locations of the off-site truck staging and ensuring that trucks use the specified haul route, and do not travel through nearby residential neighborhoods; scheduling vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets; establishing requirements for the loading/unloading and storage of materials on the Project Site; and coordinating with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.

The various safety features that would be implemented during Project construction would reduce the potential for incidents that would require police response. There would be no notable increase in police services serving the Project Site; and therefore no need for the construction of police facilities to accommodate construction population. Therefore, potential impacts on police protection services due to construction activity would be less than significant.

(2) Operation

Impact Statement POL-2: *The Project would add Site population and activities that could require police responses. However, Project security features including, among other provisions, Close Circuit Television systems (CCTV), restriction of access to non-public areas by electronically controlled and locking access cards, controlled access to parking structures, and 24-hour on-site security, including four to five private security staff. A Site design intended to enhance on-site safety, would also reduce the need for additional police services or the provision of new police facilities. Impacts on police protection services would be less than significant.*

The Project's new development would introduce additional residents, employees, hotel guests, and retail/restaurant customers to the Project Site which could potentially require an increase in LAPD police responses. As discussed in the Environmental Setting section above, the Project Site is served by the Central Community Police Station which has approximately 430 sworn officers. This station currently serves a residential population of approximately 40,000 people and reported 5,970 total crimes in 2015.²⁴ This represents an officer to population ratio of approximately one to 93 and an annual crime rate of 0.149 crimes per capita. The Central Area containing the Project Site has a higher (more favorable) ratio of officers to residents by more than four times the Citywide average of one officer per 384 residents.

The Project would generate approximately 1,060 new residents.²⁵ The increase in population from approximately 40,000 residents to approximately 41,060 residents in the Central Area could potentially: (1) require approximately 11 new officers (based on the officer to resident population ratio of 1:93 in the Central Area); or (2) reduce the officer to resident population ratio in the Central Area from 1:93 to 1:95 (if no additional officers were hired). However, even if no new officers were hired, this officer to resident population ratio would still be well above the Citywide average of 1:384.

The Project would also generate an estimated net increase in on-site non-resident population of 423 persons. LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is reflected within the overall community service ratio based on the residential population. However, the Project's net increase in the on-site non-resident population could contribute to the need for police protection services. If the Project's estimated 423 net non-residents were considered as residents, they would: (1) contribute to a potential need for 4.5 additional sworn officers (based on the existing officer to resident population ratio in the Central Area); or (2) reduce the officer to resident population ratio within the Central Area from 1:93 to 1:96 inclusive of the resident and non-resident populations, if no additional officers were hired). However, the City does not separately consider non-

²⁴ Captain Howard J. Leslie, Commanding Officer, Central Area, LAPD correspondence dated March 23, 2016 and Sergeant Mark Aceves, LAPD Central Area Adjutant, email correspondence, April 14, 2016 included in Appendix I-3 of this Draft EIR.

²⁵ Based on 650 residential condominium units and an estimated average household size of 1.63 persons per household with in the Central City Community Plan based on data from the 2010 Census.

residential population increases when calculating increased demand for police services, and as such, the service ratio for the non-residential development is subsumed within the residential ratios.

Therefore, the Project could potentially result in the need for up to 11 additional sworn officers, a 2.7 percent increase in the number of officers at the Central Community Police Station, to maintain existing service levels based on residential population, or 15.5 additional officers if accounting for combined residential and nonresidential populations.

However, this data is based Central Area Crime Statistics, which includes parts of downtown and skid row that have higher rates of crime and policing compared to the Project vicinity which would require a lower level of policing. Further, the estimate is conservative because: (1) it does not take into account the security services provided by the South Park BID Safety Team, which would help patrol the Project Site and surrounding area which would reduce the Project's demand for police protection; and (2) it does not take into account the proposed security features which would reduce the Project's demand for police protection, including CCTV, restriction of access to non-public areas by electronically controlled and locking access cards, controlled access to parking structures, and 24-hour security with four to five on-site security personnel, supplemented when need for special events.

Although not expected given the security staffing and features of the Project, even if an increase of 15.5 personnel was to occur at the Central Community Police Station associated with the Project, LAPD is unaware of any special police protection requirements for the Project and they have indicated that there are no current plans to improve or add onto the Central Community Police Station or increase the number of personnel assigned to the Central Area.²⁶ Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Accordingly, the potential for significant impacts due to the need to constructed new or expanded police facilities would be less than significant.

As shown on Table 4.1.2-1, the average emergency response time within the Central Area is 4.2 minutes, which is substantially less than both the Citywide average of 5.7 minutes and the LAPD's response time standard of seven minutes. Given this, reduced demand for police services due to on-site security personnel and design features, and given the close proximity of the Project Site to the Central Community Police Station (0.95 mile), emergency response times are not expected to significantly increase under the Project and are expected to remain below both the citywide average and the LAPD standard. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding in a timely fashion to emergencies at the Project Site. Accordingly, Project operational impacts associated with emergency response times and emergency access would be less than significant.

e. Cumulative Impacts

²⁶ Captain Howard J. Leslie, Commanding Officer, Central Area, LAPD correspondence dated March 23, 2016 and included in Appendix I-3, of this Draft EIR.

Impact Statement POL-3: *Cumulative projects would contribute to the demand for police services; although demand would be reduced through provision of security features on a project-by-project basis, contributions to the South Park BID, and revenues to the City applied to support police services. The Project would incrementally increase the need for police services, but even in light of cumulative projects, it is not expected to require construction of an expanded or new police station, construction of which would result in significant impacts on the environment. The Project's incremental contribution to demand on police services would not be cumulatively considerable and cumulative impacts associated with the Project would be less than significant.*

Chapter 3, *General Description of the Environmental Setting* of this Draft EIR, identifies 116 cumulative projects that are anticipated to be developed within the vicinity of the Project Site. For purposes of this analysis of cumulative impacts on police protection services, only those 82 cumulative projects located within the Central Community Police Station service area (e.g., Central Area) are considered as cumulative projects. **Table 4.1.2-4, Cumulative Population for Police Services**, shows the estimated residential and non-residential populations associated with these 82 cumulative projects. These are conservative estimates because they do not take into account existing development, and the associated existing resident and non-resident populations, to be removed due to the development of the cumulative projects.

Table 4.1.2-4

Cumulative Population for Police Services

| Land Use | Amount of Development^a | Units | Generation Factor (population per unit)^b | Residential Population | Non-Residential Population |
|----------------------------------|--|--------------|--|-------------------------------|-----------------------------------|
| Cumulative Projects | | | | | |
| Residential | 23,506 | units | 1.63 persons/unit | 38,315 | -- |
| Retail/Restaurant | 2,120,574 | sf | 3 persons/1,000 sf | -- | 6,362 |
| Office | 3,032,287 | sf | 4 persons/1,000 sf | -- | 12,129 |
| Hotel | 3,996 | rooms | 1.5 persons/room | -- | 5,994 |
| Total Cumulative Projects | -- | -- | -- | 38,315 | 24,485 |
| Proposed Project (net) | | | | 1,060 | 423 |
| Cumulative + Project | -- | -- | -- | 39,375 | 24,908 |

^a Calculation of amount of development for each land use category does not include schools, convention space or clinic space since the L.A. CEQA Thresholds Guide (2006) does not identify Police Service Population Conversion Factors for these uses and/or the amount of planned space for these uses is unknown.

^b Based on a Police Service Population Conversion Factor for Retail Use (including restaurant use) of 3 persons/1,000 sf, for Office use factor of 4 persons per 1,000 sf, and for Hotel use of 1.5 persons/room/day, as identified in the L.A. CEQA Thresholds Guide (2006). The residential factor is based on the average household size in the Central City Community Plan area of 1.63 persons per household from the 2010 Census.

Source: PCR Services Corporation, April 2016.

If no new officers were hired, the service ratio upon buildout of cumulative development would be one officer per 185 residents. In order to maintain the existing officer to population ratio within the Central

Area, approximately 424 new officers could be required upon buildout of the Project plus cumulative development.

As shown in Table 4.1.2-4, the non-residential population associated with the Project (423 persons) and the cumulative development (24,485 persons) combined would be 24,908 persons. If these numbers were treated as residential population, the estimated increase in officers to maintain the existing service ratio would be approximately 268 additional officers in addition to the approximately 424 additional officers for cumulative residential development. However, the City does not separately consider non-residential population increases when calculating increased demand for police services, and as was the case for the Project, the service ratio for the non-residential development is subsumed within the residential ratios.

It is expected that the cumulative projects (particularly those of a larger nature) would be subject to discretionary review by LAPD on a case-by-case basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Like the Project, many of the cumulative projects would also be expected to provide on-site security, personnel and/or design features for their residents and patrons. Additionally, similar to the Project, the cumulative projects would contribute revenue to the South Park BID and other BIDs serving Downtown such as the Downtown Center BID, Historic Los Angeles BID, Fashion District BID, Downtown Los Angeles Industrial District BID, Little Tokyo BID and Figueroa Corridor BID for additional community security and would generate revenue for the City's general fund that could be used to fund LAPD expenditures as necessary to offset the cumulative incremental impact on police services.

Still, the precise extent of implementation of security measures by cumulative projects is uncertain. Furthermore, given the sizeable non-residential population relative to the residential population associated with the cumulative projects as shown in Table 4.1.2-4, it is not certain that reliance on the residential population increase alone, and assuming non-residential demand is subsumed within that residential increase, adequately predicts estimated cumulative project impacts on police services. Therefore, it is conservatively estimated that cumulative demand for police services associated with cumulative projects, including levels of policing and the possible need for construction or expansion of supporting facilities, represents a potentially significant cumulatively significant impact.

However, the estimated potential increased need for police officers in association with the cumulative projects is considered conservative, and does not account for reduced demand for police services due to the security personnel and multiple security features that would be incorporated into the cumulative projects, including CPTED. Similar to the Project, each cumulative project would be subject to the City of Los Angeles' 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 services. As discussed above for the Project, LAPD has indicated that it does not currently have plans to improve or add onto the Central Community Police Station or increase the number of personnel assigned to the Central Area. Even in consideration of the cumulative projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Central Area is highly developed, and the site of a police station would likely be an infill lot. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, 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, which are typically financed

through the City general funds. 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.

Although cumulative impacts on police services are conservatively considered significant, the Project contribution to such impacts would not be cumulatively considerable given the security staff and comprehensive security features incorporated into the Project, as well as current presence of South Park BID Safety Team and LAPD in the area given the immediate proximity to LA LIVE. Based on the above considerations, the Project's cumulative impacts on police services would be less than significant.

4. MITIGATION MEASURES

Project impacts to police services would be less than significant with security features implemented to reduce potential impacts; therefore mitigation measures would not be required. However, the following mitigation measure is recommended to ensure compliance with LAPD requirements.

MM-POL-1: Prior to the occupancy of the Project, the Applicant shall provide the Central Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would result in less than significant impacts to police protection services with the implementation of on-site security features and security personnel. Implementation of the mitigation measure presented above would further ensure appropriate implementation of Project security and/or design features and further reduce impacts.

