IV. Environmental Impact Analysis

I.1 Public Services—Police Protection

1. Introduction

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

2. Environmental Setting

a. Regulatory Framework

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

(1) State

(a) California Vehicle Code

Section 21806 of the CVC pertains to emergency vehicles responding to Code 3 incidents/calls.¹ 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

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.

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.

(b) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates 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 services, as well as other public safety services. In City of Hayward v. Board of Trustee of California State University (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²

(2) Local

(a) City of 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

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

use, including infrastructure and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. 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.³

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

The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services, http://cityplanning.lacity.org/Cwd/Framwk/chapters/09/09.htm, accessed April 4, 2018.

Part I crimes include murder and non-negligent homicide, forcible rape, robbery, aggravated assault, burglary, motor vehicle theft, larceny-theft, and arson, U.S. Department of Justice Federal Bureau of Investigation, Uniform Crime Reporting (UCR) Offense Definitions, www.ucrdatatool.gov/offenses.cfm, accessed April 4, 2018.

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

LAPD, COMPSTAT Plus, www.lapdonline.org/inside the lapd/content basic view/6364, accessed April 4, 2018.

LAPD, COMPSTAT Plus, www.lapdonline.org/inside the lapd/content basic view/6364, accessed April 4, 2018.

(b) 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

As discussed in more detail in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the planning boundary of the Central City Community Plan (Community Plan), which was last updated in January 2003. The adopted Community Plan lists specific goals and policies related to police protections services and public safety, including the following:

- 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.
- Policy 5-2.1: Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.

b. Existing Conditions

(1) LAPD Service Areas and Bureaus

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: the Central Bureau, West Bureau, South Bureau, and Valley

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Bureau.⁸ These four bureaus are further divided into 21 service areas, which are serviced by the LAPD's 21 community police stations.⁹ Each geographic bureau is comprised of four to five geographic area police stations.¹⁰

As of December 2016, the departmental staffing resources within the LAPD included 9,897 sworn officers. Based on a total City population of 3,962,726, the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.¹¹

As shown in Figure IV.I.1-1 on page IV.I.1-6, the Project Site is located in the Central Bureau, which covers a territory of approximately 65 square miles with a population of approximately 900,000 residents. The Central Bureau oversees operations in the Central, Hollenbeck, Newton, Northeast, Rampart, and Central Traffic Division Areas. The Central Bureau borders Burbank, Glendale, Pasadena, and South Pasadena.

(2) LAPD Community Police Station

Within the Central Bureau, the Project Site is served by the Central Community Police Station, located at 251 East 6th Street, approximately 0.51 mile south of the site, as also shown in Figure IV.I.1-1. In total, the Central Community Police Station service area (Central Area) covers approximately 4.5 square miles and 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.¹⁵ The boundaries of the Central Area are Stadium Way and the Pasadena Freeway to the north, Washington Boulevard and 7th Street to the south, Los Angeles River to the east, and the Harbor Freeway to the west. In 2016, the

⁸ LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 4, 2018.

⁹ LAPD, LAPD Organization Chart, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed April 4, 2018.

LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 4, 2018.

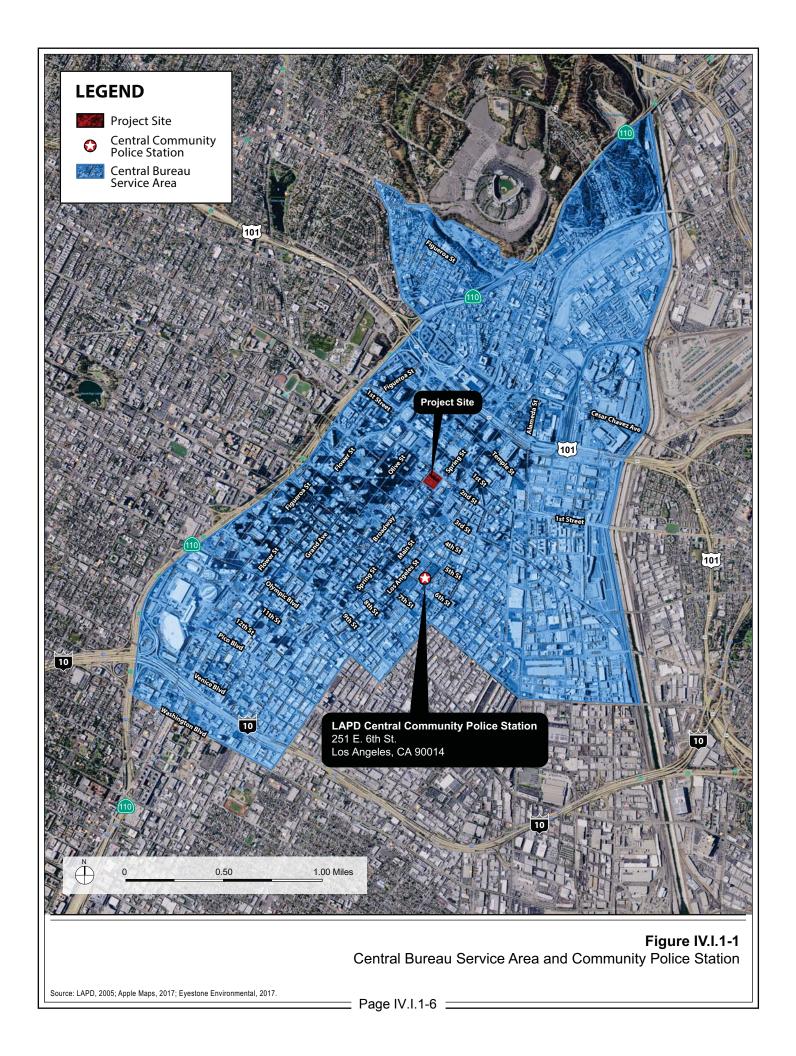
¹¹ LAPD, COMPSTAT Citywide Profile 12/04/16–12/31/16.

LAPD, About Central Bureau, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed April 4, 2018.

¹³ LAPD, About Central Bureau, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed April 4, 2018.

LAPD, About Central Bureau, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed April 4, 2018.

LAPD, About Central Area, Central Community Police Station, www.lapdonline.org/central_community_police station/content basic view/1681, accessed April 4, 2018.



average response time to emergency calls for service in the Central Area was 2.7 minutes and the average response time for non-emergency calls was 13.7 minutes, as compared with the Citywide average response times of 4.3 minutes for emergency calls and 22.5 minutes for non-emergency calls. 16,17 There are approximately 370 sworn officers and 30 civilian support staff assigned within the Central Area. Based on data provided by the LAPD Community Relationship Division, the residential service population of the Central Area is approximately 40,000 residents, and the officer-to-resident ratio is approximately 9.3 officers per 1,000 residents. Thus, the officer-to-resident ratio is substantially higher than the citywide ratio.

(3) LAPD Crime Statistics

Table IV.I.1-1 on page IV.I.1-8 provides a comparison of the Central Community Police Station service area and citywide data regarding crimes. As shown therein, based on the most recent data from the LAPD Community Relationship Division and COMPSTAT for the year 2016, approximately 6,079 crimes were reported within the Central Community Police Station service area, and 125,430 crimes were reported citywide. Based on the residential service population of the Central Community Police Station, approximately 152 crimes per 1,000 residents (0.152 crime per capita) were reported in the Central Community Police Station service area, and 32 crimes per 1,000 residents (0.032 crime per capita) were experienced citywide.

Based on the number of sworn officers staffing the Central Community Police Station, the 2016 crime ratio was 16.4 crimes per officer. In comparison, the citywide ratio was 12.7 crimes per officer.

Written correspondence from Al Neal, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, March 28, 2017. See Appendix G of this Draft EIR.

Written correspondence from Christopher Gibson, Officer, Community Relationship Division, Los Angeles Police Department, May 2, 2017. See Appendix G of this Draft EIR.

Written correspondence from Al Neal, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, March 28, 2017. See Appendix G of this Draft EIR.

Written correspondence from Al Neal, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, March 28, 2017. See Appendix G of this Draft EIR.

The LAPD calculates its officer-to-population (or officer-to-resident) ratios based on permanent residential population only. Source: Written correspondence from Christopher Gibson, Officer, Community Relationship Division, Los Angeles Police Department, May 2, 2017. See Appendix G of this Draft EIR.

Table IV.I.1-1
2016 Crimes—Central Area and Citywide

	Crimes	Service Population (Residents)	Crimes per 1,000 Residents	Crimes per Capita
Central Area	6,079	40,000	152	0.152
Citywide	125,430	3,962,726	32	0.032

Source: LAPD COMPSTAT Unit, COMPSTAT Central Area Profile 12/04/16–12/31/16 and COMPSTAT Citywide Profile 12/04/16–12/31/16.

3. Project Impacts

a. Methodology

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis herein presents statistical averages associated with the police station serving the Project Site and citywide services. The determination of impact on the capability of existing police services and personnel is based on the potential for the annual crimes per resident in the Central Area to exceed current averages due to the addition of the Project. Project design features and mitigation measures that would reduce the impact of the Project on police services are also described.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact.²¹ To the extent a project generates demand for additional police services that results in the need to construct new 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

²¹ City of Hayward v. Board Trustee of California State University (2015) 242 Cal, App. 4th 833, 847.

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's impact area. Therefore, the City makes the following assumptions based on existing zoning standards and historical development of police facilities, that in the event 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 or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

b. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with 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, 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.

(2) 2006 L.A. CEQA Thresholds Guide

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering 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.

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In assessing impacts related to police protection in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

c. Analysis of Project Impacts

(1) Project Design Features

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

- POL-PDF-1: During construction, the Project Applicant or its successor shall implement appropriate temporary security measures, including, but not limited to, security fencing, low-level security lighting, and locked entry. During construction activities, the Project's contractor will document the security measures being implemented.
- **POL-PDF-2:** During operation, the Project shall include access controls in the form of private on-site security, a closed circuit security camera system, 24-hour controlled access for the office and residential floors, and security patrols of the parking structure.
- POL-PDF-3: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building.
- **POL-PDF-4:** The Project shall provide sufficient lighting in and around the existing parking garage to maximize visibility and reduce areas of concealment.
- **POL-PDF-5:** The Project entrances to, and exits from, the building, open spaces, and pedestrian walkways shall be designed, to the extent practicable, to be open and in view of surrounding sites.
- **POL-PDF-6:** Prior to the issuance of a building permit, the Project Applicant or its successor shall consult with LAPD's Crime Prevention Unit regarding the incorporation of any additional crime prevention features appropriate for the design of the Project.
- POL-PDF-7: Prior to the issuance of a certificate of occupancy, the Project Applicant or its successor shall 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.

Additionally, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project Applicant or its successor would implement a Construction Traffic Management Plan that includes provisions for maintaining emergency access to the Project Site during construction.

(2) Relevant Project Characteristics

As described in detail in Section II, Project Description, of this Draft EIR, the Project involves the development of a 30-story, mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), 7,200 square feet of ground level commercial retail uses, and 534,044 square feet of office uses. The proposed residences would be comprised of 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units. The existing five-level parking structure located on the southern portion of the Project Site would remain and be reconfigured to provide required vehicular parking and long-term bicycle parking for the proposed uses, with surplus parking remaining available for other nearby uses, as under existing conditions.

Construction activities would require involve limited demolition of paved areas and landscaping as well as approximately 7,000 cubic yards of graded soil materials, which would be exported off-site to Chiquita Canyon Landfill and/or Manning Pit in Irwindale. The haul route to/from Chiquita Canyon Landfill is anticipated to follow segments of 2nd Street, Spring Street, 3rd Street, and Aliso Street in Downtown Los Angeles; CA-110, US-101, CA-170, and I-5; as well as Newhall Ranch Road, SR-126, and Henry Mayo Drive in Castaic. Alternatively, the haul route to/from Irwindale Landfill would follow segments of 2nd Street, Spring Street, 4th Street, Los Angeles Street, El Monte Busway East, and Arcadia Street in Downtown; US-101 and I-10; and Vincent Drive in Irwindale.

(3) Project Impacts

Threshold (a): 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 police protection services?

(a) Construction

Project construction would not substantially increase LAPD's service population in the Central Area, as the daytime population at the Project Site during construction would be temporary in nature. Nonetheless, 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 or its successor would implement temporary security measures, including, but not limited to, security fencing, lighting, and locked entry, to secure the Project Site during construction. In addition, the contractor would document the implementation of security measures.

With implementation of these features, potential impacts associated with theft and vandalism during construction activities would be reduced, and there would be no need for construction of any new or modifications to any existing police stations or other department physical facilities. Impacts would be less than significant.

Project construction activities could also potentially impact LAPD services and response times within the Central Area due to construction impacts on the surrounding roadways. As discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Although construction activities would be short-term and temporary, Project construction activities could increase response times for police vehicles along Broadway, Spring Street, 2nd Street, and other main connectors due to travel time delays caused by traffic. However, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, the study intersections along the adjacent streets are all currently operating at LOS C or better during both the A.M. and P.M. peak hours. In addition, constructionrelated trips would not cause significant traffic impacts during the A.M. and P.M. peak hours in light of Project Design Feature TR-PDF-1, which involves implementation of a construction traffic management plan, including a worksite traffic control plan to ensure that adequate and safe access is available within and near the Project Site during construction Additionally, Project Design Feature TR-PDF-1 would include measures to minimize the obstruction of traffic lanes on streets adjacent to the Project Site; schedule construction material deliveries during off-peak periods whenever possible; plan for deliveries and the staging of all equipment and materials to occur on-site as much as possible; and employ flag persons to control traffic movement during temporary traffic flow Traffic management personnel would be trained to assist in emergency disruptions. response by restricting or controlling the movement of traffic that could potentially interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) also would be utilized to ensure emergency access to the Project Site and traffic flows are maintained on adjacent rights-of-way. The final construction traffic management plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT). Furthermore, given the City's permitted hours of construction and

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the nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thus reducing the potential for construction traffic-related conflicts. As a result, construction-related traffic generated by the Project would not significantly impact LAPD response times within the Project vicinity, as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

Based on the above analysis, upon implementation of the Project design features and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site or surrounding area. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's service capability; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Further, the Project would not cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project.

Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project involves the construction of 107 residential units, approximately 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses. The Project would introduce a new residential and visitor population to the Project Site and increase LAPD's residential service population in the Central Area.

The Project would be served by the Central Community Police Station located at 251 East 6th Street, approximately 0.51 mile south of the Project Site. The Central Community Police Station is staffed by 370 sworn officers and a 30-person civilian support staff. As shown in Table IV.I.1-2 on page IV.I.1-14, the Project's total estimated service population would be 2,492 persons, including permanent residents and daytime workers; of this total, the Project would generate an estimated 334 residents, which would increase the existing LAPD residential service population in the Central Area from approximately 40,000 persons to 40,334 residents.²² With the increase in service population, the

The Project's population estimates presented herein are based on the Service Population Conversion Factors provided in the L.A. City CEQA Thresholds Guide for purposes of evaluating impacts on LAPD (Footnote continued on next page)

Table IV.I.1-2
Estimated Project-Generated Police Service Population

Proposed Land Use ^a	Units	Population Factor ^b	Service Population
Residential: Studio, One-Bedroom, and Two-Bedroom Units	94 du	3 persons/du	282 Residents
Residential: Three-Bedroom Units	13 du	4 persons/du	52 Residents
Commercial	7,200 sf	0.003 person/sf	22 Employees
Office	534,044 sf	0.004 person/sf	2,136 Employees
Police Service Population			2,492 Total (334 Residents)

sf = square feet

du = dwelling units

- ^a The existing uses on-site consist of a parking lot and a parking structure (the latter would remain as part of the Project), which do not generate a police service population.
- Based on Service Population Conversion Factors provided in the L.A. City CEQA Thresholds Guide for purposes of evaluating impacts on LAPD services. These estimates are conservative and do not precisely reflect the Project's anticipated demographics. The LAPD Service Population Conversion Factors also vary from the population and employment projections provided in Section IV.H, Population, Housing and Employment, of this Draft EIR, which are based on more current and regularly updated demographic information. Projections in Section IV.H, Population, Housing, and Employment, of this Draft EIR, estimate that the Project would generate approximately 261 residents and 2,322 employees. However, based on population factors set forth in the L.A. City CEQA Thresholds Guide, which the LAPD uses for police planning purposes, the Project would result in a population of approximately 334 residents and 2,158 employees. Use of such rates yield more conservative population estimates, which are used herein to provide a conservative analysis of Project impacts on police services.

Source: Eyestone Environmental, 2018.

officer-to-resident ratio for the Central Area would decrease from 9.3 to 9.2 officers per 1,000 residents, which would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Accordingly, the Project would not cause a substantial change in service standards relative to the officer-to-resident ratio for the Central Community Police Station service area.

As shown in Table IV.I.1-1 on page IV.I.1-8, approximately 6,079 crimes were reported in the Central Area in 2016, which equates to a crime rate of approximately 152 crimes per 1,000 residents, or 0.152 crime per capita. Based on the assumption that the annual crime rate in Central Area would remain constant at 0.152 crime per capita, the

services. These estimates do not precisely reflect the Project's anticipated demographics. The LAPD Service Population Conversion Factors also vary from the population and employment projections provided in Section IV.H, Population, Housing, and Employment, of this Draft EIR, which are based on more current and regularly updated demographic information.

Project could potentially generate an estimated 51 new crimes per year.²³ This would increase the annual number of crimes reported in the Central Area from 6,079 to an estimated 6,130 reported crimes per year, or an increase of 0.84 percent.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-5, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed circuit security camera system and controlled access for the office and residential floors. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of buildings and walkways to maximize visibility, provide for pedestrian orientation, and clearly identify secure pedestrian travel routes between the on-site Metro portal, parking garage, and points of entry into the building. The Project's building entrances and exits, open spaces, and pedestrian walkways also would be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6 and POL-PDF-7, the Applicant or its successor would consult with LAPD regarding the incorporation of crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police In addition to these Project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.²⁴ 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. Therefore, the Project's impact on police services would be less than significant.

Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by additional traffic congestion. As discussed in Section IV.J, Transportation/ Traffic, of this Draft EIR, under Future With Project Conditions (2025), traffic generated by the Project would result in significant impacts at two study intersections during the weekday A.M. peak hours and two study intersections during the weekday P.M. peak hours, collectively including two intersections along Figueroa Street, which is a City-designated disaster route. Proposed mitigation identified in Section IV.J, Transportation/Traffic, of this Draft EIR would fully mitigate impacts at two of the affected intersections, but a significant and unavoidable impact would remain at the intersection of Figueroa Street and 2nd Street

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Total crimes potentially generated by the Project = estimated crime rate of 0.152 crime per capita × Project-related residential service population of 334 persons = approximately 51 crimes.

²⁴ City of Los Angeles, Budget for the Fiscal Year 2017–18.

during the A.M. peak hours, as well as at the intersection of Beaudry Avenue and 2nd Street during the P.M. peak hours. Thus, the Project's impacts could result in traffic congestion in the Central Area that may increase the average response times for police services.

Emergency vehicles would continue to access the Project Site directly from the surrounding roadways, including Broadway, 2nd Street, and Spring Street. As the Central Community Police Station is located south of the Project Site, police vehicles would not travel through impacted intersections along Figueroa Street to access the site. The Project would not include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle 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. It is further noted that the average response times for both emergency and non-emergency calls in the Central Area are substantially less than the Citywide average response times, as previously discussed. In addition, in accordance with CVC Section 21806, drivers of police emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, the Project's impact on emergency response times would be less than significant.

Based on the above analysis, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site and surrounding area. Furthermore, the Project would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project.

Therefore, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Impacts with regard to police protection would be less than significant.

It is also noted that as of July 2017, the Los Angeles County Metropolitan Transportation Authority (Metro) contracts with LAPD to patrol Metro's stations, trains, and buses within City limits. This security provision increases the number of on-duty police officers within the City, including Downtown, and is estimated to improve response times by more than 50 percent. Once the on-site Regional Connector 2nd Street/Broadway rail station and portal (currently under construction) is operational in 2021, that portion of the

Project Site will be patrolled by LAPD per the Metro contract, thus reducing the need for LAPD response to the Project Site.²⁵

4. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, a total of 173 related projects are located in the vicinity of the Project Site. Much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing (refer to Section IV.F, Land Use, of this Draft EIR for further discussion). According to the DTLA 2040 projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.²⁶ Of the 173 related projects identified in the Project area, 140 projects fall within the service boundaries of the Central Community Police Station. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Settings, of this Draft EIR.

(a) Construction

In general, impacts to LAPD services and facilities during construction of each related project would be addressed as part of each individual project's development review process conducted by the City. Should Project construction occur concurrently with that of nearby related projects, coordination among these multiple construction sites may be required and implemented through each development's construction traffic management plan, as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, given the short-term and intermittent nature of construction activities, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, pursuant to CVC Section 21806.

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Metro Board Report Re: Transit Law Enforcement Services, File No. 2017-0113, February 23, 2017; http://losangeles.cbslocal.com/2017/02/23/lapd-to-begin-patroling-metro-buses-trains-under-new-contract/, accessed October 27, 2018.

²⁶ Growth projections current as of December 2018. Source: City of Los Angeles, DTLA 2040, About This Project, www.dtla2040.org/, accessed December 6, 2018.

Therefore, the Project's contribution to cumulative impacts on police protection services and emergency response during construction would not be significant.

(b) Operation

As shown in Table IV.I.1-3 on page IV.I.1-19, based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*, growth from the related projects located within the Central Area is estimated to result in an estimated service population of 243,959 persons over time, including both residents (permanent population) and employees (daytime population). These are conservative estimates and overstated because they are not net new residents and employees. In other words, these estimates do not account for the removal of existing uses and their associated existing resident and employee populations resulting from the development of the related projects.

As described above, the Project would contribute to the cumulative increase by generating a new service population of approximately 2,492 persons, including permanent residents and daytime workers. When considering only residential population, the related projects are estimated to generate 155,455 residents, plus the Project's 334 residents, for a total estimated service population increase of 155,789 residents in the Central Area.²⁷ As a result, the Central Area's residential police service population would increase from approximately 40,000 to an estimated 195,789 residents, which in turn would decrease the officer-to-resident ratio for the Central Area to 1.9 officers per 1,000 residents. additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Central Area, which could increase based on per capita crime rates. Assuming the same crime rate per capita currently observed in the Central Area (i.e., 0.152 crime per capita), the combined residential population of the Project and related projects theoretically could generate an estimated additional 23,733 crimes per year. This degree of cumulative population growth and the associated increased crime statistics could increase the demand for LAPD services in the Central Area. However, as previously discussed, due to the Project design features that

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The population estimates presented herein are based on the Service Population Conversion Factors provided in the L.A. City CEQA Thresholds Guide for purposes of evaluating impacts on LAPD services. These estimates may not precisely reflect each related project's anticipated demographics. For instance, to estimate the residential population for the related projects, the highest rate (4 persons/unit; typically applicable to three- and four-bedroom units) was used, even though most proposed residential projects in Downtown Los Angeles will have fewer bedrooms per unit. Thus, the residential population estimates for the related projects is conservative and overestimates the number of permanent residents that the related projects would be expected to generate. In addition, the LAPD Service Population Conversion Factors also vary from the population and employment projections provided in Section IV.H, Population, Housing, and Employment, of this Draft EIR, which are based on more current and regularly updated demographic information.

Table IV.I.1-3
Estimated Service Population from Related Projects Within Central Area

No.a,b	Project/Address	Land Use	Size	Conversion Factor	Service Population
1	Blossom Plaza	Condominium	223 du	0	0
	900 N. Broadway	Retail	25,000 glsf	0	0
		Restaurant	15,000 gsf	0	0
2	Ava Little Tokyo	Condominium	570 du	0	0
	200 S. Los Angeles St.	Apartment	280 du	0	0
		Retail	50,000 glsf	0	0
3	454 E. Commercial St.	Bus Maintenance Facility ^d	2 ac	N/A	0
4	Tenten Wilshire Expansion	Condominium	356 du	4	1,424
	1027 W. Wilshire Blvd.	Retail	5,000 glsf	0.003	15
		Office	5,000 gsf	0.004	20
5	Vibiana Lofts 225 S. Los Angeles St.	Condominium	300 du	0	0
		Retail	3,400 glsf	0	0
6	215 W. 9th St.	Condominium	210 du	4	840
	6 215 W. 9th St.	Retail	9,000 glsf	0.003	27
7	1101 N. Main St.	Condominium	318 du	4	1,272
8	Amacon Project	Apartment	208 du	4	832
	1133 S. Hope St.	Retail	5,069 glsf	0.003	16
9	Megatoys	Condominium	320 du	4	1,280
	905 E. 2nd St.	Retail	18,716 glsf	0.003	57
10	Park Fifth	Condominium	660 du	4	2,640
	427 W. 5th St., 437 S. Hill St.	Restaurant	13,742 glsf	0.003	42
11	1115 S. Hill St.	Condominium	172 du	4	688
		Restaurant	6,850 gsf	0.003	21
12	1102 W. 6th St.	Apartment	649 du	_	_
		Retail	39,996 glsf	_	_

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
13	1130 W. Wilshire Blvd.	Office	88,224 gsf	_	_
		Day Care	20 stu	_	_
		High-Turnover Restaurant	248 gsf	_	_
		Quality Restaurant	5,375 gsf	_	_
14	Metro Bus Maintenance & Operations 920 N. Vignes St.	Bus Maintenance Facility	N/A	0	0
15	Glass Tower Project	Condominium	151 du	4	604
	1050 S. Grand Ave.	Retail	3,472 glsf	0.003	11
		Restaurant	2,200 gsf	0.003	7
16	Embassy Tower	Condominium	420 du	4	1,680
	848 S. Grand Ave.	Retail	38,500 glsf	0.003	116
17	Beverly + Lucas Project 1430 W. Beverly Blvd.	Apartment	243 du	_	_
		Retail	3,500 glsf	_	_
18	Wilshire Grand Redevelopment Project	Hotel	889 rm	1.5	1,334
	900 W. Wilshire Blvd.	General Office	369,300 gsf	0.004	1,478
		Retail/Restaurant	34,776 gsf	0.003	105
19	Barlow Hospital Replacement & MP	Condominium	800 du		_
	2000 Stadium Way	Hospital	56 beds	_	_
		Retail	15,000 glsf		_
20	1435 W. 3rd St.	Apartment	122 du		_
		Retail	3,500 glsf	_	_
21	Grand Ave. Project	Condominium	1,432 du	4	5,728
	225 S. Grand Ave.	Apartment	357 du	4	1,428
		Office	681,000 gsf	0.004	2,724
		Retail	449,000 glsf	0.003	1,347

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No.a,b	Project/Address	Land Use	Size	Conversion Factor	Service Population
22	Metropolis Mixed-Use	Hotel	480 rm	1.5	720
	899 S. Francisco St.	Condominium	836 du	4	3,344
		Retail/Restaurant	46,000 gsf	0.003	138
		Office	988,225 gsf	0.004	3,953
23	LA Civic Center Office	Office	712,500 gsf	0.004	2,850
	150 N. Los Angeles St.	Retail	35,000 glsf	0.003	105
		Child Care ^e	2,500 gsf	0.004	10
24	1300 S. Hope St.	Apartment	419 du	4	1,676
		Retail	42,200 glsf	0.003	127
25	928 S. Broadway	Apartment	662 du	4	2,648
		Live/Work	11 du	4	44
		Retail	47,000 glsf	0.003	141
		Office	34,824 gsf	0.004	140
26	1200 S. Grand Ave.	Apartment	640 du	4	2,560
		Retail	45,000 glsf	0.003	135
27	Valencia Project	Apartment	218 du	_	_
	1501 W. Wilshire Blvd.	Retail	6,000 glsf	_	_
		Restaurant	1,500 gsf	_	_
28	1329 W. 7th St.	Apartment	87 du	_	_
29	534–552 S. Main St.,	Apartment	160 du	4	640
	539–547 S. Los Angeles St.	Retail	18,000 glsf	0.003	54
		Restaurant	3,500 gsf	0.003	11
		Fast-Food Restaurant	3,500 gsf	0.003	11
30	840 S. Olive St.	Condominium	303 du	4	1,212
		Restaurant	9,680 gsf	0.003	30
		Retail	1,500 glsf	0.003	5

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
31	770 S. Grand Ave.	Apartment	700 du	0	0
		Retail	27,000 glsf	0	0
		Restaurant	5,000 gsf	0	0
32	Santa Fe Freight Yard Redevelopment	Apartment	635 du	4	2,540
	950 E. 3rd St.	Retail/Restaurant	30,062 glsf	0.003	91
		School ^f	532 stu	N/A	532
33	201 S. Broadway	Mixed Office/Retail/Restaurant ^g	27,675 gsf	0.004	111
34	The City Market	Office	549,141 gsf	_	_
	1057 S. San Pedro St.	Retail	224,862 glsf	_	_
		Cinema	744 seats	_	_
		Apartment	877 du	_	_
		Hotel	210 rm	_	_
		Condominium	68 du	_	_
35	400 S. Broadway	Apartment	450 du	4	1,800
		Retail	6,904 glsf	0.003	21
		Bar	5,000 gsf	0.003	15
36	1001 S. Olive St.	Apartment	225 du	4	900
		Restaurant	5,000 gsf	0.003	15
37	Camden Arts Mixed-Use	Apartment	328 du	4	1,312
	1525 E. Industrial St.	Retail	6,400 glsf	0.003	20
		Restaurant	5,700 gsf	0.003	18
		Office	27,300 gsf	0.004	110
38	920 S. Hill St.	Apartment	239 du	4	956
		Retail	5,400 glsf	0.003	17
39	955 S. Broadway	Apartment	163 du	4	652
		Retail	6,406 glsf	0.003	20

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
40	801 S. Olive St.	Apartment	363 du	4	1,452
		Restaurant	7,500 gsf	0.003	23
		Retail	2,500 glsf	0.003	8
41	1212 S. Flower St.	Condominium	730 du	4	2,920
		Retail	7,873 glsf	0.003	24
42	820 S. Olive St.; 825 S. Hill St.	Apartment	589 du	4	2,356
		Retail	4,500 glsf	0.003	14
43	Sunset Everett Mixed-Use	Apartment	214 du	4	856
	1185 W. Sunset Blvd.	Condominium	6 du	4	24
		Single-Family Residential	6 du	4	24
44	601 S. Main St.	Condominium	452 du	4	1,808
		Retail	25,000 glsf	0.003	75
45	2051 E. 7th St.	Apartment	320 du	4	1,280
		Retail	15,000 glsf	0.003	45
		Restaurant	5,000 gsf	0.003	15
46	Herald Examiner	Apartment	391 du	4	1,564
	1111 S. Broadway & 156 W. 11th St. & 1201	Retail	49,000 glsf	0.003	147
	S. Main St.	Office	39,725 gsf	0.004	159
47	South Park Site 1	Apartment	666 du	4	2,664
	1120 S. Grand Ave.	Retail	20,600 glsf	0.003	62
48	South Park Site 4	Apartment	360 du	4	1,440
	1230 S. Olive St.	Retail	6,400 glsf	0.003	20
49	1247 S. Grand Ave.	Apartment	115 du	4	460
		Retail	4,610 glsf	0.003	14
50	Legal Aid Foundation of Los Angeles 1550 W. 8th St.	Office	33,957 gsf	_	_

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
51	Variety Arts Mixed-Use	Theater ^f	1,942 seats	N/A	1,942
	940 S. Figueroa St.	Restaurant	10,056 gsf	0.003	31
		Bar	5,119 gsf	0.003	16
52	La Plaza Cultura Village	Apartment	345 du	4	1,380
	527 N. Spring St.	Retail	23,000 glsf	0.003	69
		Specialty Retail	21,000 glsf	0.003	63
		Restaurant	11,000 gsf	0.003	33
53	1036 S. Grand Ave.	Restaurant	7,149 gsf	0.003	22
54	Coca Cola	Office	78,600 gsf	0.004	315
	963 E. 4th St.	Retail	25,000 glsf	0.003	75
		Restaurant	20,000 gsf	0.003	60
55	1335 W. 1st St.	Apartment	102 du	_	_
		Retail	3,463 glsf	_	_
56	459 S. Hartford Ave.	Apartment	101 du	_	_
57	401 N. Boylston St.	Apartment	121 du	_	_
58	1800 E. 7th St.	Apartment	122 du	_	_
		Restaurant	4,605 gsf	_	_
		Retail	3,245 glsf	_	_
59	1150 W. Wilshire Blvd.	Apartment	80 du	_	
		Restaurant	4,589 gsf	_	_
60	737 S. Spring St.	Apartment	320 du	4	1,280
		Pharmacy/Drug Store	25,000 gsf	0.003	75
61	520 S. Mateo St.	Apartment	600 du	4	2,400
		Office	30,000 gsf	0.004	120
		Retail	15,000 glsf	0.003	45
		Restaurant	15,000 gsf	0.003	45
62	1218 W. Ingraham St.	Apartment	80 du	_	_

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
63	Palmetto & Mateo 555 S. Mateo St.	Retail	153,000 glsf	0.003	459
64	732 S. Spring St.	Apartment	400 du	4	1,600
		Pharmacy/Drug Store	15,000 gsf	0.003	45
65	340 S. Hill St.	Apartment	428 du	4	1,712
		Restaurant	2,894 gsf	0.003	9
66	1145 W. 7th St.	Condominium	241 du	_	_
		Retail	7,291 glsf	_	_
67	540 S. Santa Fe Ave.	Office	89,825 gsf	0.004	360
68	360 S. Alameda St.	Apartment	55 du	4	220
		Office	6,300 gsf	0.004	26
		Restaurant	2,500 gsf	0.003	8
69	118 S. Astronaut E.S. Onizuka St.	Apartment	77 du	4	308
70	Kaiser Permanente Los Angeles Medical Center Expansion 765 W. College St.	Medical Office	100,000 gsf	0.004	400
		Inpatient Facility ^f	62 beds	N/A	62
71	Stadium Way & Chavez Ravine Apartments 959 E. Stadium Way	Apartment	158 du	_	_
72	700 W. Cesar Chavez Ave.	Apartment	299 du	4	1,196
		Retail	8,000 glsf	0.003	24
73	Clinic at 7th & Wall	Medical Office	66 emp	N/A	66
	649 S. Wall St.	Assisted Living ^f	55 beds	N/A	55
74	Metro Emergency Security Operations Center 410 N. Center St.	Office	110,000 gsf	0.004	440
75	500 S. Mateo St.	Restaurant	12,882 gsf	0.003	39
76	Medallion Phase 2	Apartment	471 du	4	1,884
	300 S. Main St.	Retail	5,190 glsf	0.003	16
		Restaurant	27,780 gsf	0.003	84

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
77	Alexan S. Broadway	Apartment	300 du	4	1,200
	850 S. Hill St.	Retail	3,500 glsf	0.003	11
		Restaurant	3,500 gsf	0.003	11
78	340 N. Patton St.	Apartment	44 du	_	_
79	Alameda Hotel	Hotel	66 rm	1.5	99
	400 S. Alameda St.	Restaurant	2,130 gsf	0.003	7
		Retail	840 glsf	0.003	3
80	Apex II	Apartment	341 du	4	1,364
	700 W. 9th St.	Retail	11,687 glsf	0.003	36
81	649 S. Olive St.	Hotel	241 rm	1.5	362
82	Sapphire Mixed-Use 1111 W. 6th St.	Apartment	362 du		_
		Retail	25,805 glsf	_	_
83	Grand Residences	Condominium	161 du	4	644
	1233 S. Grand Ave.	Restaurant	3,000 gsf	0.003	9
84	675 S. Bixel St.	Hotel	126 rm	_	_
		Apartment	422 du		_
		Retail	4,874 glsf	_	
85	740 S. Hartford Ave.	Apartment	80 du		_
86	Lifan Tower	Condominium	304 du	_	_
	1235 W. 7th St.	Retail	5,699 glsf	_	_
87	940 S. Hill St.	Apartment	232 du	4	928
		Restaurant	14,000 glsf	0.003	42
88	1322 Linwood Ave.	Apartment	84 du	_	_
89	1340 S. Olive St.	Apartment	156 du	4	624
		Retail	5,000 glsf	0.003	15
		Restaurant	10,000 gsf	0.003	30

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
90	1334 S. Flower St.	Apartment	188 du	4	752
	TOUT O. FIUWEI OI.	Retail/Restaurant	10,096 glsf	0.003	31
91	929 E. 2nd St.	Retail	37,974 glsf	0.003	114
		Other ^g	71,078 gsf	0.004	285
92	633 S. Spring St.	Hotel	176 rm	1.5	264
		Restaurant	8,430 gsf	0.003	26
		Bar	5,290 gsf	0.003	16
93	Luxe Hotel	Hotel	300 rm	1.5	450
	1020 S. Figueroa St.	Condominium	435 du	4	1,740
		Retail	58,959 glsf	0.003	177
94	1200 S. Figueroa St.	Residential	648 du	4	2,592
		Restaurant	20,000 gsf	0.003	60
		Retail	28,000 glsf	0.003	84
95	701 S. Hill St.	Apartment	124 du	4	496
		Retail	8,500 glsf	0.003	26
96	525 S. Spring St.	Apartment	360 du	4	1,440
		Retail	9,400 glsf	0.003	29
97	Case Hotel 1106 S. Broadway	Hotel	151 rm	1.5	227
98	425 W. 11th St.	Office	500 emp	0	0
99	Freehand Hotel 416 W. 8th St.	Hotel	200 rm	1.5	300
100	The Bloc	Office	737,710 gsf	0.004	2,951
	700 S. Flower St.	Retail	260,000 glsf	0.003	780
		Restaurant	50,000 gsf	0.003	150
		Theater ^f	800 seats	N/A	800
101	1728 W. 7th St.	Restaurant/Bar	13,100 gsf	_	_

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
102	Olympic Tower	Hotel	373 rm	1.5	560
	815 W. Olympic Blvd.	Retail	65,074 glsf	0.003	196
		Condominium	374 du	4	1,496
		Office	33,498 gsf	0.004	134
		Conference Centere	10,801 gsf	0.004	44
103	LA Gateway Project	Apartment	1,367 du	4	5,468
	1025 W. Olympic Blvd.	Restaurant	20,000 gsf	0.003	60
		Retail	20,000 glsf	0.003	60
104	Oceanwide Plaza	Condominium	504 du	4	2,016
	1101 S. Flower St.	Hotel	183 rm	1.5	275
		Retail	120,583 glsf	0.003	362
		Restaurant	46,000 gsf	0.003	138
105	Los Angeles Sports and Entertainment District	Office	601,800 gsf	0.004	2,408
	Figueroa St. & 11th St.	Convention Centere	250,000 gsf	0.004	1,000
106	Hall of Justice	Government Building	1,600 emp	0	0
	211 W. Temple St.	Parking Structure	1,000 spc	0	0
107	418 S. Spring St.	High-Rise Condominium	96 du	0	0
		Hotel	122 rm	0	0
		Retail	10,000 glsf	0	0
		Health Club	2,000 gsf	0	0
		Bar	3,500 gsf	0	0
108	1013 N. Everett St.	Apartment	49 du	4	196
109	708 N. Hill St.	Apartment	162 du	4	648
		Retail	5,000 glsf	0.003	15
110	211 W. Alpine St.	Apartment	122 du	4	488
		Retail	7,500 glsf	0.003	23
111	130 S. Beaudry Ave.	Apartment	220 du	4	880

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
112	College Station Mixed-Use	Condominium	770 du	4	3,080
	129 W. College St., 924 N. Spring St.	Retail	51,592 glsf	0.003	155
113	Urban View Lots 495 S. Hartford Ave.	Apartment	218 du	_	_
114	1316 W. Court St.	Apartment	60 du	_	_
115	8th & Figueroa Mixed-Use	Apartment	438 du	4	1,752
	744 S. Figueroa St.	Retail	7,500 glsf	0.003	23
116	1201 N. Broadway	Apartment	118 du	4	472
		Office	8,800 gsf	0.004	36
117	1346–1354 W. Court St.	Apartment	43 du	_	_
118	433 S. Main St.	Condominium	161 du	4	644
		Mixed-Use ^g	6,900 gsf	0.004	28
119	Downtown LA Hotel 926 W. James M. Woods Blvd.	Hotel	247 rm	1.5	371
120	JMF Tower	Condominium	100 du	4	400
	333 W. 5th St.	Hotel	200 rm	Factor 4 0.003 - 4 0.003 4 0.003 4 0.004 - 4 0.004 1.5 4 1.5 0.003 4 0.004 0.003 0.003 4 - 4 - 4 - 4	300
		Restaurant	27,500 gsf	0.003	83
121	Times Mirror Square	Apartment	1,127 du	4	4,508
	202 W. 1st St.	Office	285,088 gsf	4 0.003 — 4 0.003 4 0.004 — 4 0.004 1.5 0.003 4 0.004 0.003 4 0.003 4	1,141
		Supermarket	50,000 gsf	0.003	150
		Restaurant	75,589 gsf	0.003	227
122	888 S. Hope St.	Apartment	526 du	4	2,104
123	Sofia Los Angeles	Apartment	606 du	<u> </u>	_
	1106 W. 6th St.	Retail	25,000 glsf	_	_
124	Ferrante	Apartment	1,500 du	4	6,000
	1000 W. Temple St.	Retail	30,000 glsf	0.003	90

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No.a,b	Project/Address	Land Use	Size	Conversion Factor	Service Population
125	640 S. Alameda St., 1206 E. 6th St.	Apartment	1,305 du	4	5,220
		Condominium	431 du	4	1,724
		Hotel	412 rm	1.5	618
		Office	253,514 gsf	0.004	1,015
		Retail	127,609 glsf	0.003	383
		School ^e	29,316 gsf	0.004	118
		Art Space ^e	22,429 gsf	0.004	90
126	1300 S. Figueroa St.	Hotel	1,024 rm	1.5	1,536
127	Budokan of Los Angeles 237–249 S. Los Angeles St.	Sports Center ^e	63,000 gsf	0.004	252
128	King's Arch 537 S. Broadway	Office	45,000 gsf	0.004	180
129	Title Insurance Building 433 S. Spring St.	Office	320,000 gsf	0.004	1,280
130	Subway Terminal Retail 417 S. Hill St.	Retail/Office ^g	130,000 glsf	0.004	520
131	405 S. Hewitt St.	Office	255,500 gsf	0.004	1,022
		Retail	4,970 glsf	0.003	15
		Restaurant	9,940 gsf	0.003	30
132	333 S. Alameda St.	Apartment	994 du	4	3,976
		Retail	99,300 glsf	0.003	298
133	The San Pedro Towers	Affordable Housing	298 du	4	1,192
	600–628 S. San Pedro St, 611–615 S.	Manager Apartment	5 du	4	20
	Crocker St, 518–522 E. 6th St	Retail	3,136 glsf	0.003	10
		Office	16,773 gsf	0.004	68
134	1000 S. Hill St.	Apartment	498 du	4 1.5 0.004 0.003 0.004 0.004 1.5 0.004 0.004 0.004 0.004 0.004 0.003 4 0.003 4 0.003	1,992
		Retail	8,707 glsf		27

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No.a,b	Project/Address	Land Use	Size	Conversion Factor	Service Population
135	1011 N. Broadway	Hotel	92 rm	1.5	138
136	1018 W. Ingraham St.	Apartment	43 du	4	172
		Retail	7,400 glsf	0.003	23
137	Hotel 92 rm	4	880		
		Office	20,021 gsf	0.004	81
		Restaurant	19,609 gsf	0.003	59
		Retail	9,250 glsf	0.003	28
138	1100 S. Main St.	Apartment	379 du	4	1,516
		Retail	25,810 glsf	0.003	78
139	1625 W. Palo Alto St.	Hotel	88 rm	_	_
140	1219 S. Hope St.	Hotel	75 rm	1.5	113
		Restaurant	7,700 gsf	0.003	24
141	1246 W. Court St.	Apartment	54 du	_	
142	1307 W. 7th St.	Apartment	76 du	_	
		Retail	6,035 glsf	_	
143	1322 W. Maryland St.	Apartment	47 du	1.5 4 0.003 4 0.004 0.003 0.003 4 0.003 1.5 0.003 4 0.003 4 4 0.003 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	
		Retail	760 glsf	_	_
144	1323 S. Grand Ave.	Apartment	284 du	4	1,136
		Retail	6,300 glsf	0.003	19
145	656 S. Stanford Ave.	Apartment	82 du	4	328
146	The Weingart Towers	Affordable Housing	378 du	4	1,512
	554–562 Š. San Pedro St., 555–561 S. Crocker St.	Manager Apartment	4 du	4	16
		Retail	1,758 glsf	0.003	6
		Office	4,410 gsf	0.004	18
		Dining Room/Flex Space ^e	5,932 gsf	0.004	24
147	601 S. Central Ave.	Apartment	236 du	4	944
		Retail	12,000 glsf	0.003	36

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
148	640 S. Santa Fe Ave.	Office	107,127 gsf	0.004	429
149	641 S. Imperial St.	Apartment	140 du	4	560
		Office	14,749 gsf	0.004	59
150	643 N. Spring St.	Apartment	203 du	4	812
		Retail	21,049 glsf	0.003	64
151	668 S. Alameda St.	Apartment	475 du	4	1,900
		Office	43,000 gsf	0.004	172
		Retail	9,000 glsf	0.003	27
		Supermarket	15,000 gsf	0.003	45
		Restaurant	w17,000 gsf	0.003	51
152	676 S. Mateo St.	Apartment	172 du	4	688
		Retail	23,025 glsf	0.003	70
153	755 S. Los Angeles St.	Office	60,243 gsf	0.004	241
		Retail	16,694 glsf	0.003	51
		Restaurant	26,959 gsf	0.003	81
154	940 E. 4th St.	Apartment	93 du	4	372
		Retail	14,248 glsf	0.003	43
		Office	6,000 gsf	0.004	24
155	1410 S. Flower St.	Apartment	152 du	4	608
		Retail	1,184 glsf	0.003	4
156	845 S. Olive St.	Apartment	208 du	4	832
		Retail	810 glsf	0.003	3
		Restaurant	1,620 gsf	0.003	5
157	330 S. Alameda St.	Apartment	186 du	Factor 0.004 4 0.004 4 0.003 4 0.003 0.003 0.003 0.003 0.004 0.003 0.003 0.003 4 0.003 0.003 4 0.003 0.003 4 0.003 0.004 4 0.003 0.004 4 0.003 0.004 4 0.003 0.004 4 0.003	744
		Office	10,415 gsf	0.004	42
		Retail	11,925 glsf	0.003	36

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No.a,b	Project/Address	Land Use	Size	Conversion Factor	Service Population
158	527 S. Colyton St.	Condominium	310 du	4	1,240
		Retail	11,375 glsf	0.003	35
		Art Production Space ^e	11,736 gsf	0.004	47
159	Fashion District Residences	Apartment	452 du	4	1,808
	212–230 E. 7th St., 701–739 S. Maple Ave.	Condominium 310 du	0.003	21	
		Restaurant	6,802 gsf	Factor 4 0.003 0.004 4 0.003 0.003 4 0.003 N/A 0.004 0.003 4 0.003 1.5 0.004 4 1.5 4 0.003 4 0.003 4 0.003	21
160	755 S. Wall St.	Apartment	323 du	4	1,292
		Retail	4,400 glsf	Factor 4 0.003 0.004 4 0.003 0.003 4 0.003 N/A 0.004 0.003 4 0.003 1.5 0.004 4 1.5 4 0.003 4 0.003 4 0.003	14
		Event Space ^f	125 per	N/A	125
		Office	53,200 gsf	0.004	213
		Restaurant	4,420 gsf	0.003	14
161	1101 E. 5th St., 445-457 S. Colyton St.	Live/Work	129 du	4	516
		Retail	26,979 glsf	0.004 4 0.003 0.003 4 0.004 0.003 N/A 0.004 0.003 4 0.003 1.5 0.004 4 1.5 4 0.003	81
		Restaurant	31,719 gsf	0.003	96
		Hotel	113 rm	1.5	170
		Art Uses ^e	13,771 gsf	0.004	56
162	1045 S. Olive St.	Apartment	800 du	4	3,200
163	Figueroa Centre	Hotel	220 rm	1.5	330
	913 S. Figueroa St.	Apartment	200 du	4	800
		Retail	94,080 glsf	0.003	283
164	8th, Grand & Hope Tower	Apartment	409 du	4	1,636
	754 S. Hope St.	Retail	7,329 sf	0.003	22
165	1340 S. Hill St.	Apartment	233 du	4	932

Table IV.I.1-3 (Continued)
Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
166	670 Mesquit St.	Apartment	308 du	4	1,232
		Hotel	236 rm	1.57	354
		Office	944,055 gsf	0.004	3,777
		Retail	79,240 glsf	Factor 4 1.57 0.004 0.003 0.003 0.004 0.004 0.003 4 0.003 4 0.003 4 0.003 4 0.003 4 0.003 4 0.003 4 0.003 1.5	238
		Restaurant	89,576 gsf	0.003	269
		Event Space ^e	93,617 gsf	0.004	375
		Gym ^e	62,148 gsf	0.004	249
		Grocery	56,912 gsf	0.003	171
167	1030-1380 N. Broadway, 1251 N. Spring St	Apartment	920 du	4	3,680
		Retail	21,406 glsf	0.003	65
168	Alameda Square	Office	1,300,000 gsf	_	_
	777 S. Alameda St.	Retail	250,000 glsf	_	_
169	1248 S. Figueroa St.	Hotel	1,162 rm	1.5	1,743
		Restaurant	13,145 gsf	0.003	40
170	215 W. 14th St.	Apartment	154 du	4	616
		Retail	10,700 glsf	0.003	33
171	1745 E. 7th St.	Apartment	57 du	4	228
		Retail	6,000 glsf	0.003	18
172	354 S. Spring St.	Apartment	212 du	4	848
		Restaurant	15,280 gsf	0.003	46
173	Alameda District Plan	Residential	22 du	4	88
		Office	7,443,200 gsf	0.004	29,773
		Retail	645,000 glsf	0.003	1,935
		Hotel	750 rm	1.5	1,125
		Restaurant	20,000 gsf	0.003	60
		Museum ^e	70,000 gsf	0.004	280

Table IV.I.1-3 (Continued) Estimated Service Population from Related Projects Within Central Area

No. ^{a,b}	Project/Address	Land Use	Size	Conversion Factor	Service Population
Relate	d Projects Service Population				243,959
Net Pro	oject Service Population				2,492
Total S Projec	Service Population for Related Projects and t				246,451
Relate	d Projects Residential Service Population				155,455
Net Pro	oject Residential Service Population				334
	Residential Service Population for Related ts and Project				155,789

ac = acres

du = dwelling units

emp = employees

glsf = gross leasable square feet

gsf = gross square feet

per = persons

spc = spaces

stu = students

N/A = Information is not available.

This indicates that the related project is not located within the Central Community Police Station service area. Therefore, the service population was not calculated.

Totals calculated have been rounded up to the nearest whole number and may not sum due to rounding.

- ^a Project No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.
- PRelated Project Nos. 1, 2, 5, 14, 31, 98, 106, and 107 have been built and are operational. As these related projects have already been accounted for in existing conditions, the respective service populations were not calculated.
- The following L.A. CEQA Thresholds Guide Police Service Population Conversion Factors were used: Residential (three-, four-bedroom units): 4 persons/unit (the highest rate available); Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf; Hotel: 1.5 persons/room/day.
- ^d This project is an expansion of existing Metro bus maintenance and inspection facilities. Therefore, the police service population is not

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Table IV.I.1-3 (Continued) Estimated Service Population from Related Projects Within Central Area

No. ^{a,b} Project/Address	Land Use	Size	Conversion Factor	Service Population
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expected to increase.

- ^e The L.A. CEQA Thresholds Guide does not provide a police service population factor for this type of land use. Therefore, the highest available rate for non-residential land uses (i.e., 4 persons per 1,000 sf for office uses) is applied.
- The L.A. CEQA Thresholds Guide does not provide a police service population factor for land uses per student, employee, person, bed, or seat. Therefore, the police service population is assumed to be equivalent to the number of individual, beds, or seats.
- This related project does not specify the land use. Therefore, the highest available rate for non-residential land uses (i.e., 4 persons per 1,000 sf for office uses) is applied.

Source: Eyestone Environmental, 2018.

would be implemented as part of the Project, the Project's contribution to the General Fund, and LAPD's policing services within the on-site Metro station and portal, the Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site.²⁸

As previously discussed, it is noted that much of this growth is anticipated by the City and will be incorporated into the DTLA 2040 Plan currently being prepared by the Department of City Planning. Current DTLA 2040 projections indicate an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.²⁹ While these DTLA 2040 projections are lower than the estimated population growth attributable to the related projects based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*, the latter population rates are used by the LAPD for purposes of evaluating impacts on police services and may not necessarily reflect more current and regularly updated demographic information. Furthermore, the estimated number of cumulative residents (permanent population) and employees (daytime population) evaluated herein is considered conservative and overstated because it does not reflect the removal of existing uses and their associated existing resident and employee populations resulting from the development of the related projects. Moreover, as indicated above, it is anticipated that many of the related projects will not ultimately proceed to approval and construction.

In any case, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes review by the LAPD to ensure sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the City's Framework Element, as discussed 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.³⁰ As such, it is premature and speculative to estimate any specific type, location, or intensity of future police resource expansions, whether in terms of personnel or facilities. In addition, it is anticipated that the related

Of the estimated 23,733 crimes per year, the Project's contribution would be only 51 crimes per year, or approximately 0.21 percent of the cumulative crime increase.

²⁹ Growth projections current as of December 2018. Source: City of Los Angeles, DTLA 2040, About This Project, www.dtla2040.org/, accessed December 6, 2018.

³⁰ City of Los Angeles, Budget for the Fiscal Year 2017–18.

projects would implement adequate security features similar to the Project's, including mitigation measures if appropriate, 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 revenue, etc.) that could be applied toward the provision of new police facilities and related staffing, as deemed appropriate.

With regard to emergency response, the Project and related projects would introduce new uses in the Project area that would generate additional traffic. Any resulting traffic congestion would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays. As discussed above, the Project is not anticipated to substantially affect emergency response times in the Central Area, and the Project would not contribute to a significant cumulative impact relative to emergency response times. It is further noted that the current average response times for both emergency and non-emergency calls in the Central Area are substantially less than the Citywide average response times. Moreover, the drivers of emergency vehicles would continue to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with CVC Section 21806.

In addition, LAPD will continue to patrol Metro's stations, trains, and buses within City limits, including the future on-site station and portal (currently under construction), which will become operational in 2021. As discussed above, this security provision increases the number of on-duty police officers within the City, including Downtown, and is estimated to improve response times by more than 50 percent.³¹ As the Downtown area has a high concentration of Metro stations and bus lines, the police presence in the Project vicinity is expected to be considerable, particularly when accounting for regular LAPD patrols of the Central Area.

With regard to cumulative impacts on police protection, consistent with the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements 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

Metro Board Report Re: Transit Law Enforcement Services, File No. 2017-0113, February 23, 2017; http://losangeles.cbslocal.com/2017/02/23/lapd-to-begin-patroling-metro-buses-trains-under-new-contract/, accessed October 27, 2018.

budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Based on the above considerations, the Project would not contribute to cumulative adverse impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. As such, the Project's contribution to cumulative operational impacts to police protection services would not be cumulatively considerable, and cumulative impacts on police protection services would be less than significant.

5. Mitigation Measures

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

6. Level of Significance After Mitigation

Project-level and cumulative impacts related to police protection services would be less than significant without mitigation.

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