

4. ENVIRONMENTAL IMPACT ANALYSIS

K. PUBLIC SERVICES

2 SHERIFF PROTECTION

1. INTRODUCTION

This section describes existing police protection services and analyzes potential impacts related to these services that would occur as a result of Project implementation. The focus of the analysis is on Los Angeles County Sheriff's Department (LACSD) facilities and staffing resources that currently serve the Project Site and vicinity, including whether the Project would generate the need for new or physically altered sheriff's stations or other facilities. This section is based, in part, on information provided by the LACSD (included in **Appendix G-2, Sheriff Department Correspondence**, of this Draft EIR). This section also incorporates information from the: Los County General Plan Update (2035) Safety Element (Safety Element, 2015) and associated EIR (2015); and other County plans and environmental documents.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) County of Los Angeles Sheriff's Department

The Harbor-UCLA Medical Center Campus is located within the unincorporated Harbor Community Plan Area of the County of Los Angeles, within relatively short distance of several incorporated cities, including Los Angeles, Torrance and Carson. Police protection service in the Harbor Community Plan Area and the Project Site is provided by LACSD, with assistance from the police departments of the surrounding cities (e.g., the cities of Los Angeles, Long Beach, Torrance, and Gardena) under mutual aid agreements with the County.¹

LACSD provides police protection services to more than one million residents living within 90 unincorporated communities, as well as to more than four million residents living within 42 contract cities.² LACSD, which is divided into 10 divisions, also provides police protection services to nine community colleges, Metro, 48 superior courts, and County-owned facilities located in incorporated cities (e.g., parks, marinas, government buildings, hospitals, community colleges, etc.).³ LACSD, along with the Los Angeles County Fire Department (LACFD), also provides provide first response during declared emergencies such as natural disasters and terrorist events.⁴

¹ Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, correspondence dated March 18, 2016.

² County of Los Angeles, *Environmental Impact Report for the Los Angeles County General Plan Update (2035)*, SCH. No. 2011081042, page 5.14-12. Certified March 24, 2015.

³ *Ibid.*

⁴ *Ibid.*

(2) LACSD Carson Sheriff’s Station

The Project Site is located within LACSD’s South Patrol Division and within the service area of the LACSD’s Carson Sheriff’s Station⁵. The Carson Sheriff’s Station, which provides general police protection services within the South Patrol Division, is located at 21356 S. Avalon Boulevard in Carson, approximately two miles east of the Project site.⁶ The Carson Sheriff’s Station has an approximately 24.21 square mile service area that includes the City of Carson and the unincorporated communities of Rancho Dominguez, Torrance, and Harbor City.⁷ The estimated resident population of this service area is 117,000. Other LACSD stations in the vicinity include the Lomita, Compton, and Lakewood Stations, located five, eight and 14 miles from the Project Site, respectively.⁸

As of January 1, 2016, the Carson Sheriff’s Station: was staffed by approximately 177 sworn officers and 40 civilian employees; has assigned assets of an undisclosed number of patrol vehicles, motorcycles, unmarked vehicles, and other specialty vehicles; is equipped with a helistop for emergency flight operations; operated on a 24-hour basis utilizing multiple shifts (day, night, and early morning); and had an undisclosed number of personnel per shift.⁹ **Table 4.K.2-1, Carson Sheriff’s Station**, provides summary information concerning this station, while **Figure 4.K.2-1, Carson Sheriff’s Station**, identifies the location of this station relative to that of the Project Site. According to the LACSD, the Carson Sheriff’s Station has operated above capacity for many years, although there are presently no plans in development to expand the station in order to meet the growing needs of the community it serves.¹⁰

Table 4.K.2-1

Carson Sheriff’s Station

Facility Name	Address	Jurisdiction	Distance (miles)	Personnel
Carson Sheriff’s Station	21356 S. Avalon Blvd.	LACSD	2.0	177 sworn officers 40 civilian employees

Source: Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

⁵ Tracey Jue, Director, Facilities Planning Division, LACSD, correspondence dated March 31, 2016. Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, correspondence dated March 18, 2016. Also Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

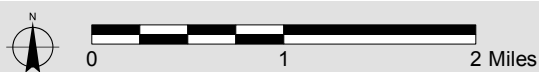
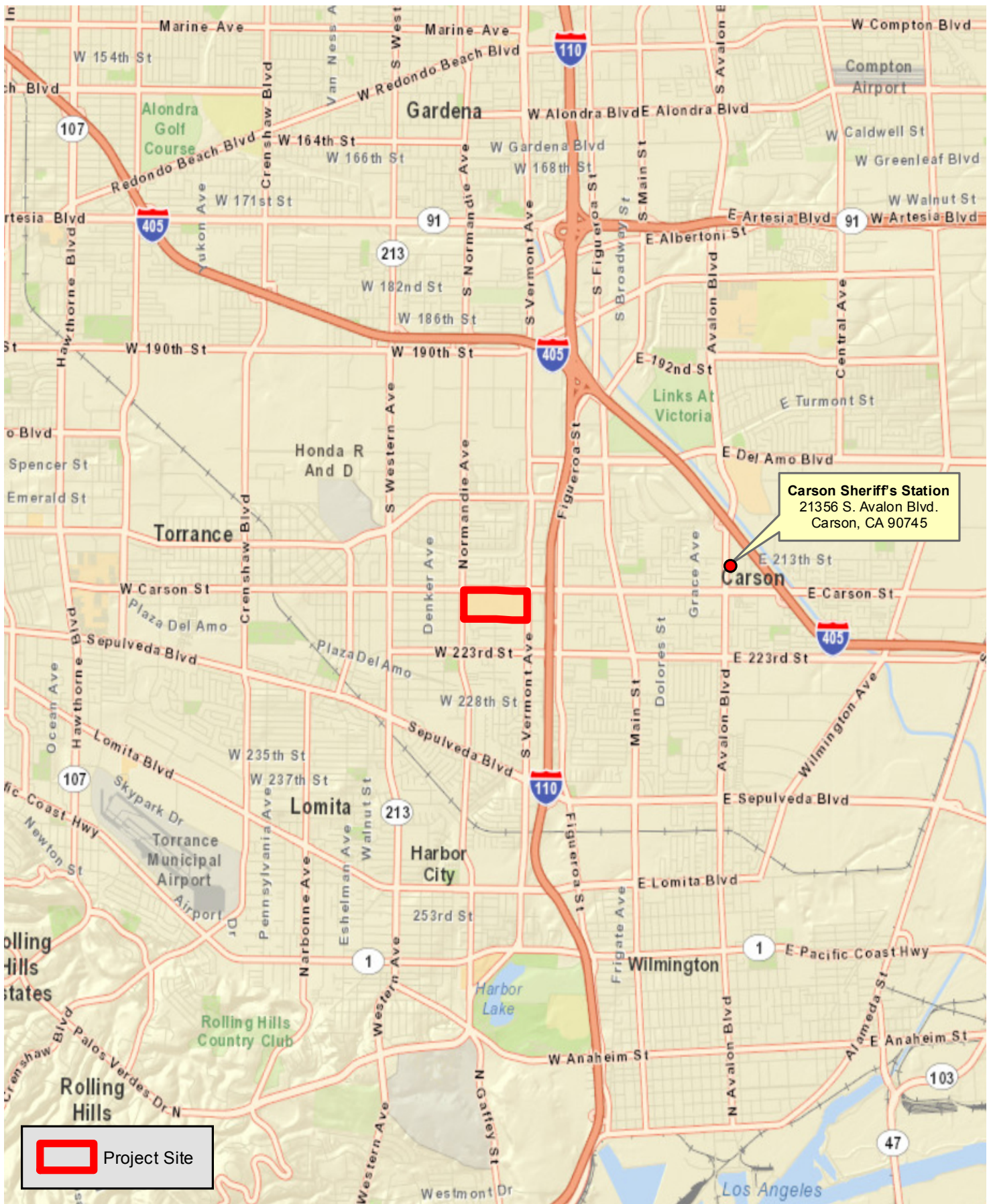
⁶ Ibid.

⁷ Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

⁸ Ibid.

⁹ Tracey Jue, Director, Facilities Planning Division, LACSD, letter dated March 31, 2016.

¹⁰ Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.



Carson Sheriff's Station

FIGURE

4.K.2-1

Harbor-UCLA Medical Center Master Plan
Source: ESRI Street Map, 2009; PCR Services Corporation, February 2016.

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Table 4.K.2-2, LACSD Call, Response Time, and Crime Data for the Unincorporated Communities Surrounding the Project Site, provides 2011-2015 LACSD call, response time, and crime data for the unincorporated communities surrounding the Project Site. As indicated therein, the LACSD received a total of 6,444 calls for Service, had average response times of 4.2 minutes for emergent (crimes in progress that are life threatening), 7.7 minutes for priority (crimes in progress that are not life threatening), and 32.2 minutes for routine calls (crimes that have already occurred and are not life threatening), and had a total of 648 Part I crimes (criminal homicide, forcible rape, robbery, aggravated assault, burglary, larceny theft, grand theft auto, arson) reported, in the given geography in 2015. As further indicated, of the 648 crimes reported in the given geography in 2015, the majority were of four types: petty theft (127), vehicle burglary (119), grand theft auto (108), and burglary from a residence (103). Last, as indicated, while average response times within the given geography between 2011 and 2015 decreased, both calls for service and Part I crimes increased during the same period. According to the LACSD, these increases are partly attributable to an increase in homelessness in the area which is believed to be at least partly due to the transport of indigents to the Medical Center from outside the area for treatment, and the lack of transportation and placement services for these patients once released.¹¹ According to LACSD, police response times to the Project Site from the Carson Sheriff's Station are currently four minutes for emergency calls, seven minutes for priority calls, and 28 minutes for routine calls.¹² This is compared to the widely-accepted police protection industry standards of 10 minutes or less for emergency calls, 20 minutes or less for priority calls, and 60 minutes or less for routine calls.¹³ Therefore, LACSD response times to the Project site are currently well within accepted standards.

(3) LACSD County Services Bureau

Because the Harbor-UCLA Medical Center Campus is a County facility, police protection service for the Project Site is provided primarily by LACSD's County Services Bureau (CSB) rather than by LACSD's Carson Station.¹⁴ As indicated in **Table 4.K.2-3, LACSD Harbor-UCLA Medical Center Satellite Station**, CSB operates a satellite station (927 sf) in the Existing Hospital Tower of the Medical Campus which, as of January 1, 2016, was staffed by 24 sworn officers, 25 civilian employees, and 82 non-LACSD contract security guards, with assets assigned to the office including four patrol cars, one Sheriff's security officer vehicle, two unmarked vehicles, two T3 Chariots, and four bicycles.¹⁵ CSB also occupies a locker room facility (1,672 sf) at 21840 Normandie Avenue at the west end of the Campus.¹⁶ CSB operates at the Project Site on a 24-hour basis utilizing multiple shifts (day, night, and early morning).

¹¹ Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ Tracey Jue, Director, Facilities Planning Division, LACSD, letter dated March 31, 2016 and included in Appendix G-2 of this Draft EIR. Also, Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, memorandum dated March 18, 2016 and included in Appendix G-2. Also Chris E. Marks, Carson Station Commander, LACSD, memorandum dated March 22, 2016 and included in Appendix G-2

¹⁵ Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, memorandum dated March 18, 2016 and included in Appendix G-2 of this Draft EIR.

¹⁶ *Ibid.*

Table 4.K.2-2

LACSD Call, Response Time, and Crime Data for the Unincorporated Communities Surrounding the Project Site

Call Type	Calls for Service				
	2011	2012	2013	2014	2015
Emergent	298	384	308	336	420
Priority	887	1,084	1,123	1,170	1,241
Routine	3,582	3,826	3,822	4,231	4,783
Total	4,767	5,294	5,253	5,737	6,444

Call Type	Average Response Times (Minutes)				
	2011	2012	2013	2014	2015
Emergent	5.1	5.5	4.6	5.2	4.2
Priority	8.2	9	8.4	7.9	7.7
Routine	42.1	49.3	38.5	36.1	32.2

Crime Type	Part I Crimes				
	2011	2012	2013	2014	2015
Homicide	0	4	2	4	1
Rape	1	1	1	3	1
Robbery, Weapon	8	17	14	11	13
Robbery, Strong-arm	12	15	9	7	10
Aggravated Assault	58	57	48	45	47
Burglary, Residence	82	82	98	81	103
Burglary, Other Structure	39	43	47	56	57
Grand Theft	61	47	52	58	59
Grand Theft Auto	89	106	97	121	108
Arson	3	2	6	2	3
Vehicle Burglary	103	118	113	95	119
Petty Theft	118	144	107	121	127
Total	574	636	594	604	648

Source: Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

CSB also maintains several special purpose details in its central office which are available to respond to calls at the Project Site, including an Arson Explosives Detail, Canine Services Detail, Emergency Services Detail

Table 4.K.2-3

LACSD Harbor-UCLA Medical Center Satellite Station

Facility Name	Address	Jurisdiction	Distance	Personnel	Assets
LACSD Harbor-UCLA Medical Center Satellite Station	1000 W. Carson St.	LACSD (CSB)	On-site	24 sworn officers 25 civilian employees 82 non-LACSD security guards	4 patrol cars 1 security vehicle 2 unmarked vehicles 2 T3 chariots 4 bicycles

Source: Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

(including emergency preparedness and management), Haz-Mat Detail, and Special Enforcement Detail (e.g., involved in high-risk tactical operations).¹⁷

During 2015, there were a total of 67 Part 1 crimes committed in RD 8545 (which includes the Harbor-UCLA Medical Center site) as set forth in **Table 4.K.2-4, 2015 Crime Data for RD 8545**. Based on the total existing daytime population at the Project Site of 7,560¹⁸ and the total number of existing officers operating out of the LACSD on-site satellite station of 106¹⁹, the existing on-site officer to daytime population ratio at the Project Site is 1:71.3. Based on the existing daytime population of 7,560 and the total number of Part I crimes on the Project Site in 2015 of 67, the existing annual crimes per capita at the Project Site is 0.009.

Since CSB occupies offices within the Medical Center, CSB police protection response times to the Project Site are extremely rapid.²⁰ Response times for emergent, priority, and routine calls are often within five minutes.²¹ This is compared to the widely-accepted police protection industry standards of 10 minutes or less for emergency calls, 20 minutes or less for priority calls, and 60 minutes or less for routine calls.²² Therefore, LACSD response times to the Project site are currently well within accepted standards.

(4) LACSD Transit Bureau South

¹⁷ *Ibid.*

¹⁸ *The total existing daytime population at the Project Site was estimated by adding the existing number of on-site employees (5,464) to the existing number of daily patient visits (2,096). The existing number of daily patient visits (2,096) was estimated by dividing the total number of existing annual patient visits (545,079) by the total number of weekday days per year (260). This provides a conservative estimate since it assumes that daily patient visits occur only during weekdays since most of the on-site clinics and other on-site patient-serving uses are only open during weekdays.*

¹⁹ *The total number of existing officers operating out of the LACSD on-site satellite station (106) includes both sworn LACSD officers (24) and non-LACSD contract security guards (82)*

²⁰ *Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, correspondence dated March 18, 2016.*

²¹ *Ibid.*

²² *Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.*

Table 4.K.2-4

2015 Crime Data for RD 8545

Part 1 Crime Type	Number of Crimes
Murder/non-negligent homicide	0
Forcible rape	0
Robbery	1
Aggravated assault	1
Burglary	1
Motor vehicle theft	19
Larceny/theft	45
Arson	0
Total	67

Source: Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, correspondence dated March 18, 2016.

LACSD's Transit Bureau South (TBS) provides transit related police protection service (transit-related crimes only) for County Metropolitan Transportation Authority (Metro) facilities, including the Metro Transit Station located on Carson Street approximately 0.10 miles to the east.²³ Because of the proximity of the transit station to the Project Site, and because the Project Site is located within a County-designated Transit Overlay District (TOD) associated with the transit station, TBS assists in providing police protection

service to the Project Site (transit-related crimes only).²⁴ There were no reported transit-related crimes at the Project Site in 2015; there were a minimal number of transit-related crimes in the area immediately surrounding the Project Site in 2015, but none were related to the Harbor-UCLA Medical Center.²⁵

(5) Emergency Management and Response

The CSB's Emergency Operations Bureau, specifically the Tactical Planning Unit and Sheriff's Response Team, is responsible for responding to natural or manmade disasters or emergencies at the Project Site that require the provision of law, order, emergency care, and shelter for disaster victims.²⁶ The Bureau adheres to the policies and procedures of the Los Angeles County Operational Area Emergency Response Plan (OAERP), maintained by the County Office of Emergency Management (OEM), which outlines the

²³ Tracey Jue, Director, Facilities Planning Division, LACSD, correspondence dated March 31, 2016. Also, Karl R. Schow, Captain, Transit Bureau South, LACSD, correspondence dated March 17, 2016.

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, correspondence dated March 18, 2016.

organizational structure for the County's coordinated response to catastrophic events.²⁷

(6) Project Site

The 72-acre Project Site, which is bordered by Carson Street, 220th Street, Vermont Avenue, and Normandie Avenue, is currently fully developed with the Harbor-UCLA Medical Center. The Medical Center currently includes a total of 1,279,284 square feet of hospital/inpatient, medical office/outpatient, biomedical research and development (R&D), administrative office, day-care, warehouse/storage, library, central plant, and retail uses, and 453 hospital beds. These land uses support 5,464 existing employees and an estimated 545,079 annual patient visits (including admittances/discharges, diagnostics/treatment, and patient exam visits).

For the most part, the perimeter of the Medical Center Campus is demarcated with chain-link fences and concrete block walls, with limited landscape screening. The parking structures and some of the private streets used for maintenance are also gate-controlled, while most of the public streets and public surface parking lots are not gate-controlled.

The Los Angeles County Department of Health Services (DHS) maintains an existing Security Management Plan for the Harbor-UCLA Campus.²⁸ The purpose of the Security Management Plan is to minimize the risk of personal injury or property loss/damage due to criminal activity or workplace violence.²⁹ It is designed to minimize crimes against persons and property, provide security awareness, prepare for the successful management of sentinel security events, and to ensure compliance with applicable codes and regulations.³⁰ It incorporates patients, visitors, and staff as well as the facilities and grounds of the Medical Center and clinics.³¹ The primary provisions of the Security Management Plan are summarized below³²:

- Provide a visible security presence and patrol to reduce crime and increase the feeling of security by patients, visitors, and staff;
- Provide a timely response to emergencies and requests for assistance, including assistance in subduing violent or aggressive patients or visitors;
- Control vehicle movement on facility grounds, including control of parking and access to the Emergency Department and helistop;
- Provide an employee security orientation and education program;
- Implement routine and emergency incident reporting procedures;
- Implement a program of inspection, preventative maintenance and testing of security equipment;

²⁷ *Ibid.*

²⁸ *Los Angeles County Department of Health Services, Security Management Plan for the Harbor-UCLA Medical Center, Policy No. 405, effective date March 1996, last revised March 2011.*

²⁹ *Ibid.*

³⁰ *Ibid.*

³¹ *Ibid.*

³² *Ibid.*

- Implement a plan for access control provisions and employee identification procedures; and
- Conduct annual evaluations of the scope, objectives, performance, and effectiveness of the program.

As part of the Security Management Program, LACSD uses a round-the-clock integrated combination of police protection officers and private security guards for: inspections, preventive maintenance, and testing of security equipment; security hazard identification and correction; monitoring of closed circuit surveillance cameras; weapons screening; access screening/control (including magnetometer screening at the main hospital, key card controls, etc.); and employee security education.³³ The Security Management Plan also outlines requirements for perimeter fencing, area lighting, provision of panic alarms in high risk areas, access controls to buildings and parking structures, and other on-site security features.³⁴ Finally, the Security Management Plan outlines emergency security procedures for handling security incidents, civil disturbances, bomb threats, infant abductions, hostage situations, and traffic control during security/emergency incidents.³⁵

b. Regulatory Framework Summary

(1) Federal

There are no federal police protection regulations pertinent to the Project.

(2) State

There are no State police protection regulations pertinent to the Project.

(3) Local

(a) Los Angeles County General Plan

As a County-run facility on County-owned land in the unincorporated area, the proposed Project is subject to the Los Angeles County General Plan Update (2035), including the Public Services and Facilities Element and the Safety Element. Applicable goals and polices from these Elements are identified below:

Goal PS/F 1: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.

- **Policy PS/F 1.1:** Discourage development in areas without adequate public services and facilities.
- **Policy PS/F 1.2:** Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.
- **Policy PF/F 1.6:** Support multi-faced public facility expansion efforts, such as substations,

³³ *Ibid.*

³⁴ *Ibid.*

³⁵ *Ibid.*

mobile units, and satellite offices.

Goal S 4: Effective County emergency response management capabilities.

- **Policy S 4.1:** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- **Policy S 4.2:** Support County emergency providers in reaching their response time goals.
- **Policy S 4.3:** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.

(b) LACSD Level-of-Service Standards

LACSD has indicated that an officer-to-population ratio of one officer to every 1,000 residents provides the desired level of service for its service area.³⁶ This ideal standard typically is applied in EIRs for proposed projects that are served by LACSD as a means to develop a rough assessment of a project's impacts on police protection services.³⁷

(c) LACSD Response Time Standards

As indicated previously, LACSD responses are within widely-accepted police protection industry standards of 10 minutes or less for emergency calls, 20 minutes or less for priority calls, and 60 minutes or less for routine calls.³⁸

(d) Los Angeles County Office of Emergency Management

The Los Angeles County Office of Emergency Management's (OEM) is responsible for emergency operations in unincorporated Los Angeles County. OEM's Operational Area Emergency Response Plan (OAERP) establishes the coordinated emergency response system, which includes prevention, protection, response, recovery, and mitigation. The OAERP also provides an overview of emergency management in the area.

(e) Crime Prevention Through Environmental Design

LACSD generally subscribes to the principles of Crime Prevention Through Environmental Design (CPTED).³⁹ The goal of CPTED is to reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior, while encouraging the legitimate use of the site.⁴⁰ The overall tenets of

³⁶ *County of Los Angeles, Los Angeles County General Plan Update (2035), page 5.14-12. Adopted October 6, 2015.*

³⁷ *Ibid.*

³⁸ *Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.*

³⁹ *Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, memorandum dated March 18, 2016 and included in Appendix G-2 of this Draft EIR.*

⁴⁰ *Ibid.*

CPTED include defensible space, territoriality, surveillance, lighting, landscaping, and physical security.⁴¹ LACSD ensures that new development adheres to CPTED principals through the provision of comments on development plans during the CEQA and development review processes.

3. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of impacts on police protection services in this section addresses the Project's effects on the ability of LACSD to adequately serve existing and future population at the Project Site, 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 LACSD facilities. Because police protection services are provided to the Project Site primarily by the LACSD CBS satellite station on the Project rather than by the Carson Sheriff's Station, this analysis presents statistical for the satellite station and the RD within which the Project Site is located, including the ratio of satellite station sworn officers and contract security personnel to the on-site population, and the ratio of crimes within the RD to the on-site population, as a basis for measuring the increase in policing required for the Project. The analysis uses the above, rather than the LACSD level of service standard of one officer to every 1,000 residents, because the Project does not include a residential component and would not directly increase the number of residents in the West Carson community.

The analysis of impacts on police access and response times in this section focuses on existing response times to the Project Site, the consistency of these response times with LACSD response time standards, and whether the Project would potentially increase these response times due to increased traffic or other factors such that they would no longer be within the response time standards.

The analysis in this section is based on the information sources identified at the beginning of this section.

b. Thresholds of Significance

The analysis of potential impacts on police protection is based on thresholds derived from the Los Angeles County Department of Regional Planning Initial Study Checklist screening question, which is based in part on Appendix G of the State CEQA Guidelines. This question is as follows:

15. Public Services

- a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
 - Police protection?

⁴¹ *Ibid.*

Based on this factor, the Project would have a potentially significant impact on police protection if it would result in the following:

SHER-1: Would the Project require the addition of a new police station, or the expansion, consolidation or relocation of an existing police station, to maintain service, which would result in a substantial adverse physical impact on the environment?

c. Project Characteristics or Design Features

(1) Project Characteristics

The Project would address the future needs of the communities served by the Harbor-UCLA Medical Center Campus (Campus). The existing Campus contains approximately 1,279,300 square feet of developed floor area, including the recently completed Surgery and Emergency Room Replacement Project (Replacement Project), 5,464 existing employees, and an estimated 545,079 annual patient visits. The Master Plan Project encompasses construction of a New Hospital Tower that meets current seismic building codes, renovation of the existing Hospital tower to house non-acute care support uses, replacement of aging facilities (including approximately a dozen WWII barracks), reconfigured vehicular and pedestrian access to and circulation within the Campus, and implementation of a cohesive site design that enhances the experience of staff, patients, and visitors. This would result in a net increase of 1,178,071 square feet of building floor area, and net increases in total Campus-wide employees and annual patient visits of 37 percent (2,030 employees) and 34 percent (185,745 annual visits or 714⁴² daily visits), respectively. Project construction would be anticipated to occur in phases through the year 2030. See Chapter 2.0, Project Description, of this Draft EIR for further project description, including Figure 2-6, *Harbor-UCLA Medical Campus Master Plan Site Plan*, and Table 2-1, *Existing and Proposed Land Use Summary*.

(2) Project Design Features

The Master Plan Project includes the following Project Design Features (PDFs) that are specific to sheriff protection services:

PDF-SHER-1: The County Department of Public Works shall provide the LACSD CSB with the on-site satellite station space, locker space, and associated parking spaces, required to serve the Project. This shall include, at a minimum, the existing amount of satellite station space (927 sf), locker room space (1,672 sf), and associated parking spaces, plus an additional 36 percent (approximately 1,000 sf) of this operational space and associated parking to serve the net increase in on-site employees and patients under the Project.

PDF-SHER-2: Project design shall adhere to the Crime Prevention Through Environmental Design (CPTED) principles. This shall include, but not be limited to, the provision of physical design features that discourage crime such as defensible space, territoriality, surveillance, lighting,

⁴² Daily visits were estimated based on the following formula which assumes that patients visits occur during workdays: 52 weeks per year times 5 days a week = 260 weekdays. So, 185,745 patients ÷ 260 days = ~715 patients a day. This provides a conservative estimate because it assumes that patient visits are restricted to weekdays, largely because most of the on-site clinics and other non-hospital on-site medical uses would only be open during weekdays.

landscaping, and physical security. The CPTED features shall be identified on the design plans for the Project which shall be provided to the LACSD for review and approval.

d. Project Impacts

Threshold SHER-1: Would the Project require the addition of a new police station, or the expansion, consolidation or relocation of an existing police station, to maintain service, which would result in a substantial adverse physical impact on the environment?

Impact Statement SHER-1: *The Project would not require the addition of a new police station but would require the relocation and expansion of the existing on-site sheriff substation in order to maintain service levels, the construction of which could have potentially significant environmental effects. However, given implementation of Project Design Features and mitigation measures that address police protection service, response times, and Crime Prevention Through Environmental Design (CPTED), construction and operational impacts would be less than significant.*

(1) Construction

(a) Police Protection Services

Construction activities associated with the Project would include demolition, site preparation including trenching for utilities, and construction of new buildings and street/sidewalk improvements in various phases through the year 2030. These periodic construction activities could temporarily increase demand for police protection associated with patrolling the construction site. However, as required by Mitigation Measure SHER-1, the construction sites would be fully fenced, lighted with security lighting, and patrolled either by on-site LACSD personnel from the on-site LACSD satellite station or by private security hired by DHS. Furthermore, an LACSD satellite station is located on-site, and the Campus has a 24-hour a day LACSD presence, which would both discourage construction site crimes and provide for almost immediate response to any observed or reported construction site crimes that are in process. Therefore, the demand for police protection services during Project construction would not require new or altered police protection facilities to maintain service, and the impact would be less than significant.

(b) Police Access and Response Times

Regarding police access and response times during construction, construction staging and construction worker parking associated with the Project would be accommodated on the Project Site, limiting potential conflicts with traffic on local streets. In addition, as required by the Mitigation Measure SHER-2, emergency access would be provided and maintained to existing and new on-site uses, and to off-site uses, throughout construction. Furthermore, while the Project would generate construction traffic, require the construction of off-site utility and roadway improvements, and potentially require temporary lane closures along one or more of the four streets bordering the Project Site: (1) as discussed in Section 4.L., *Transportation and Traffic*, with the implementation of PDF-TRAF-1, which requires the implementation of a County-required construction traffic management plan, Project traffic impacts during construction would be less than significant; (2) the Project would implement Mitigation Measure SHER-3, which requires that Project construction contractors coordinate with the LACSD concerning any planned temporary lane closures and other construction activities that could affect emergency access and emergency response times; and (3) an LACSD satellite station is located on-site such that LACSD response times to calls for service at the Project

Site would continue to be well below LACSD response time standards, even with the addition of Project construction traffic on local streets. Therefore, impacts on police access and response times during Project construction would not require new or altered police protection facilities to maintain service, and the impact would be less than significant.

(2) Operation

(a) Police Protection Services

As indicated previously, the Project would result in a net increase of up to 1,178,071 square feet of building floor area on-site, and net increases in total Campus-wide employees and annual patient visits of up to 2,030 employees and 185,745 annual patients' visits. This would translate to a net increase in the daily on-site population of up to 2,744 persons (an approximately 36 percent increase over the existing on-site daily population of 7,560).⁴³ Based on the existing officer to daytime population ratio at the Project Site of 1:71.3, and the existing annual crimes per capita at the Project Site of 0.009, the Project would result in an increase in demand for up to 38 additional officers (both LACSD sworn officers and non-LACSD security guards, a 36 percent increase over the 106 existing officers), and an increase in on-site crimes of an estimated 25 crimes per year. This, in turn, would create the need for additional space at LACSD's on-site satellite station to accommodate the additional officers. However, per Project Design Feature PDF-SHER-1, the Project would continue to provide space for LACSD's satellite station, locker room, and associated parking on-site, and would increase these by a minimum of 36 percent (approximately 1,000 sf) to accommodate the additional officers required to serve the Project's demand for sheriff protection services. The construction of the expanded sheriff substation facilities at the Medical Center Campus would be carried out in the context of the larger Master Plan Project implementation phases, and thus the environmental impacts of such construction activities has been accounted for in the evaluation of impacts presented throughout Chapter 4 of this Draft EIR. Thus, given that the Project would not result in the need for additional construction, consolidation, relocation, or expansion of any other off-site police or sheriff facilities, impacts would be considered less than significant.

In addition, Project design would adhere to the Crime Prevention Through Environmental Design (CPTED) principles as required by PDF-SHER-2, and DHS would revise the Security Management Plan for the Harbor-UCLA Campus, as required, to address the proposed physical and operational changes to the Campus under the Project as required by Mitigation Measure SHER-4. These would include structural and operational security features that would reduce the incremental increase in crime and the need for additional officers under the Project.

Because the environmental impacts associated with constructing the additional on-site LACSD facility space and parking is already evaluated as part of the Project in this Draft EIR (as part of the 1,178,071 sf net increase in Campus-wide square footage), the development of the additional LACSD facility square footage and parking required to serve the Project would not result in additional significant environmental effects.

⁴³ *The total net increase in daytime population at the Project Site was estimated by adding the net increase in on-site employees (2,030) to the net increase in daily patient visits (714). The net increase in daily patient visits (714) was estimated by dividing the total net increase in annual patient visits (185,745) by the total number of weekdays per year (260). This provides a conservative estimate since it assumes that daily patient visits occur only during weekdays since most of the on-site clinics and other on-site patient-serving uses are only open during weekdays.*

Furthermore, the Project would increase County tax revenues which the County could use to hire the additional officers required to serve the Project. Therefore, Project operational impacts on police protection services would be less than significant.

(b) Police Access and Response Times

The LACSD's Carson Sheriff's Station is located 2.0 miles east of the Project Site and has response times to the Project Site of four minutes for emergency calls, seven minutes for priority calls, and 28 minutes for routine calls⁴⁴, while LACSD's Harbor-UCLA Medical Center satellite station is located on-site and has response times to all three types of calls on-site that are often within five minutes.⁴⁵ These are compared LACSD's response time standards of 10 minutes or less for emergency calls, 20 minutes or less for priority calls, and 60 minutes or less for routine calls.⁴⁶ Based on the above, LACSD's response times to the Project Site from both the Carson Sheriff's Station and the on-site satellite station are well within LACSD response time standards.

Development of the Project would increase the existing employee population and annual patient visits at the Project Site, and would increase operational traffic in the Project vicinity. As determined by the traffic analysis in Section 4.L, *Transportation and Parking*, of this Draft EIR, Project operational traffic would significantly impact a total of six intersections under Cumulative (2030) Plus Project Impacts, even with implementation of all feasible mitigation measures. Accordingly, traffic associated with the Project could potentially affect LACSD emergency vehicle response times in the area from the Carson Sheriff's Station, but would not be expected to affect LACSD response times from the on-site satellite station given the on-site location of that facility.

Construction traffic impacts are addressed through PDF-TRAF-1, which requires a Construction Traffic Management Plan. Furthermore, emergency response is routinely facilitated, particularly for high priority calls, through such means as the use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Also, emergency response times to the Project Site from both the Carson Sheriff's Station and the on-site satellite station are well within the LACSD's response time standards, and that the majority of on-site calls would be responses to from the on-site satellite station that would be unaffected by off-site traffic. For all these reasons, LACSD response times to the Project Site would continue to be within LACSD response time standards, Project operational impacts on LACSD response times would not require new or physically altered police stations given the provision of an expanded on-site sheriff substation on the Medical Center Campus as required by PDF-SHER-1, and the impact would be less than significant.

e. Cumulative Impacts

(a) Police Protection Services

Chapter 3.0, General Description of Environmental Setting, of this Draft EIR provides a list of 26 related

⁴⁴ *Ibid.*

⁴⁵ Britta S. Steinbrenner, Captain, County Services Bureau, LACSD, correspondence dated March 18, 2016.

⁴⁶ Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

projects that are planned or are under construction within an approximately 2.4 mile radius of the Project. These projects are summarized in Table 3-1, *Related Projects List*, and shown on Figure 3-1, *Related Projects Map*, in Chapter 3.0. As shown in Figure 3-1, these related Projects occur in several jurisdictions, including unincorporated Los Angeles County and the Cities of Los Angeles Carson and Torrance. Of these related projects, four occur within unincorporated Los Angeles County and, along with the Project, would create a demand for service from LACSD. These four related projects are listed in **Table 4.K.2-4, Related Projects for Sheriff Protection**. As indicated therein, these related projects would include a total of 211 dwelling units and 3,900 sf of retail.

Table 4.K.2-4

Related Projects for Sheriff Protection

Map ID	Address	Land Use	Size
1	24500 Normandie Ave.	Apartments	112 du
		Retail	3,900 sf
2	1028 W 223 rd St.	Condos	19 du
3	22700 Meyer St.	Condos	60 du
4	19208 Vermont Ave.	Condos	20 du
Total			211 du 3,900 sf

Source: PCR Services Corporation, May 2016. Based on related projects list from Fehr & Peers Traffic Study, 2016.

Based on the 177⁴⁷ sworn officers operating out of the Carson Sheriff’s Station and the existing resident population within the Carson Station service area of this station of 117,000⁴⁸, the existing officer to resident population in the Carson Station service area is 1:661. Applying this ratio to the 597 residents projected for the related project’s 211 dwelling units (based on 2.83 persons per household within the County’s South Bay Planning Area), the related projects would create a demand for one additional LACSD officer. And, as discussed previously under the Project analysis, the Project would create a demand for up to 38 additional LACSD officers (both LACSD sworn officers and non-LACSD security guards).

While the Project and the related projects together would generate a demand for up to 39 additional LACSD officers, the related projects would create the demand from the Carson Sheriff’s Station while the Project would create the demand primarily from the LACSD CSB on-site satellite station. In this respect, the Project would not contribute to the cumulative demand for service from LACSD’s Carson Sheriff’s Station. However, even if the demand from the related projects and the Project were considered together, this demand would not be expected to require new or expanded LACSD that would result in additional significant environmental

⁴⁷ Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

⁴⁸ *Ibid.*

effects because: (1) the Project would provide the additional on-site operational space and parking required to accommodate its demand for 38 additional officers, and the impacts of constructing this space and parking is already evaluated as part of the Project in this Draft EIR; (2) it is anticipated that the one additional officer required by the related projects would be able to be accommodated at the Carson Sheriff's Station without expansion because this would represent a less than one percent increase in the number of officers at the station; (3) the Project and the related projects would be required to implement security features, such as those outlined in CPTED, to reduce their demand for service from LACSD; (4) the Project and related projects would be subject to review by LACSD to ensure that required security features are incorporated; and (5) the Project and the related projects would generate tax revenues for the County that the County could use to hire the additional LACSD officers; etc.). Therefore, the cumulative impact on police protection services would be less than significant.

(b) Police Access and Response Times

The Project and the related projects could potentially block access to on-site and adjacent off-site uses, could include construction activities (such as temporary lane closures) that disrupt area traffic, and could generate construction traffic that that results in localized traffic congestion and slows LACSD emergency response. As indicated in the Project analysis above, Project construction activities would not result in significant impacts in terms of these issues because: (1) the Project would restrict most construction staging and parking to the Project Site, implement a construction management plan, and coordinate with LACSD in advance of any lane closures or other activities that could impact emergency access and response times; (2) LACSD response times to the Project Site from both the Carson Sheriff's Station and the LACSD on-site satellite station are both well below LACSD response time standards; and (3) the traffic analysis in Section 4.L., *Transportation and Traffic*, of this Draft EIR concludes that Project construction traffic would result in less than significant traffic congestion. Similarly, as indicated in the Project analysis above, Project operation would not result in significant impacts associated with these issues because: (1) LACSD response times to the Project Site from both the Carson Sheriff's Station and the LACSD on-site satellite station are both well below LACSD response time standards; and (2) while the traffic analysis in Section 4.L., *Transportation and Traffic*, of this Draft EIR concludes that Project operational traffic would significantly impact 10 intersections, even with implementation of all feasible mitigation measures, this traffic would not be expected to adversely affect LACSD response times to the Project Site given the on-site location of the LACSD satellite station.

Several of the above considerations that lead to the conclusions of less than significant Project impacts on police access and response times during Project construction and operation would also apply to the related Projects. For example, like the Project, the related Projects would be required to implement a construction management plan to minimize traffic disruptions during construction, and like the Project, LACSD response times from the Carson Sheriff's Station to the related projects are likely well below LACSD response time standards. Furthermore, emergency response is routinely facilitated through the use of sirens to clear a path of travel, given the grid pattern of the local street system there are likely multiple routes for the Carson Station to each of the related projects such that traffic congested streets could likely be avoided, and LACSD maintains mutual aid agreements with the surrounding cities such that police response could potentially originate from multiple stations in the area. However, it is unknown whether all 26 of the related projects would restrict construction staging and parking on-site, or that the traffic analysis for each of these related projects would conclude less than significant construction and operational traffic impacts. Hence, this analysis conservatively concludes that cumulative impacts to police access and response times would be significant, although the Project's contribution to any such impacts would not be cumulatively considerable

(because the Project would result in less than significant impacts to police access and response times).

While the cumulative impact on police access and response times could potentially contribute to the future need for new or expanded LACSD facilities in the West Carson community, and while the construction of any such facilities could potentially result in substantial adverse physical impacts, it would be too speculative to predict where and when such new or expanded facilities would be needed as LACSD does not currently have plans for new or expanded LACSD facilities in the area.⁴⁹ Therefore, per State *CEQA Guidelines* Section 15145 regarding speculation, no further analysis is required.

4. MITIGATION MEASURES

In order to reduce impacts related to sheriff protection to less than significant, the following mitigation measures are required:

Mitigation Measure SHER-1: During Project construction, construction sites shall be fully fenced, lighted with security lighting, and patrolled by either the LACSD on-site satellite station personnel (either sworn officers or contract security guards) or private security hired by DHS.

Mitigation Measure SHER-2: Emergency access to the LACSD shall be provided and maintained to existing and new on-site uses, and to off-site uses, throughout construction.

Mitigation Measure SHER-3: The Project construction contractors shall regularly notify and coordinate with the LACSD concerning Project construction activities, including any on- and off-Campus lane closures and other construction activities that could affect emergency access or emergency response times.

Mitigation Measure SHER-4: The Security Management Plan for the Harbor-UCLA Campus shall be updated by DHS, in consultation with the LACSD, to address the proposed physical and operational changes to the Campus under the Project. At a minimum, the primary security features and measures currently in place at the Campus under the Security Management Plan shall be carried forward under the Project.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would have less than significant impacts on sheriff protection with implementation of the Project Design Features and mitigation measures provided in this section.

⁴⁹ Chris E. Marks, Captain, Carson Station Commander, LACSD, correspondence dated March 22, 2016.

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