

1.0 INTRODUCTION

This section of the Draft Environmental Impact Report (EIR) discusses police protection within the Loyola Marymount University campus and immediate vicinity.

2.0 REGULATORY FRAMEWORK

2.1 State

2.1.1 California State Penal Code

All law enforcement agencies within the State of California are organized and operate in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are State Peace Officers.

2.2 City of Los Angeles

2.2.1 General Plan Framework Element

The Los Angeles Citywide General Plan Framework contains policies and objectives which address the provision of police services in the City of Los Angeles and the Los Angeles Police Department (LAPD). These policies and objectives deal with insuring adequate service infrastructure as population growth occurs via monitoring of services, supporting the provision of additional police and pursuing additional funding for additional officers.

As stated in the City of Los Angeles General Plan Framework Element, primary police law enforcement services are provided by the LAPD and supplemental services are provided by the Los Angeles County Sheriff, the California Highway Patrol, the Federal Bureau of Investigation (FBI), and the Drug Enforcement Administration (DEA). The Framework Element sets forth goals related to public services in the City. Goal 91 states that every neighborhood in the City shall have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.

2.2.2 General Plan Safety Element

The General Plan Safety Element addresses the issue of protection of people from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes). It addresses police matters only in the context of natural disasters.

Hazard Mitigation

Goal 1

- A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.

Objective 1.1

- Implement comprehensive hazard mitigation plans and programs that are integrated with each other and with the City's comprehensive emergency response and recovery plans and programs.

Emergency Response (Multi-Hazard)

Goal 2

- A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.

Objective 2.1

- Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.

Disaster Recovery (Multi-Hazard)

Goal 3

- A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.

Objective 3.1

- Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.

2.2.3 COMPSTAT Program

In 1994 the LAPD incorporated the use of COMPSTAT. COMPSTAT, short for computer statistics, has a well-established and proven track record in reducing crimes and improving the overall operating systems of several major metropolitan police departments. The elements of COMPSTAT consist of four core elements: accurate and timely intelligence; effective tactics; rapid deployment; and relentless follow-up and assessment. The core elements provide a road map for proactive crime fighting and have increased the effectiveness of LAPD's response times.

2.2.4 Crime Prevention Program

The City of Los Angeles has adopted a program to help crime prevention through environmental design called Design Out Crime. The Design Out Crime program introduces ways to deter crime by changing the design of buildings and public spaces. It involves simple, preventative steps that developers, architects, and individuals can take to reduce crime in their homes, businesses, and neighborhoods. For example, lighting and landscaping may be enhanced in parking lots to improve visibility, and vines or planted coverings may be placed on walls to deter graffiti.¹

The Design Out Crime program is an inter-agency program with a task force led by the City Planning Department and the Police Department.

The LAPD's *Programs, Resources, Services, and Strategies of the LAPD: Reducing Crime in the City of Los Angeles in 2005* reports a list of programs, resources, services, and strategies set forth by the LAPD to prevent and reduce crime in the City of Los Angeles.

2.2.5 Los Angeles Municipal Code, Chapter 5, Article 2

Police protection in the City is also governed by the Los Angeles Municipal Code (LAMC) Chapter 5, Article 2, which states that the Police Department shall have the power and duty to enforce the penal provisions of the Charter, City ordinances, and state and federal law.

¹ Los Angeles Police Department Web site, http://www.lapdonline.org/prevent_crime/content_basic_view/8852.

2.3 County

2.3.1 County of Los Angeles Mutual Aid Agreement

The County of Los Angeles is required by state law to organize a formal mutual aid agreement between all police departments within the County or City's jurisdiction. This agreement is set forth in the Mutual Aid Operations Plan for Los Angeles County. Pursuant to this agreement, in the event of a significant event which requires immediate response by more law enforcement personnel, police responders from the Los Angeles County Sheriff's Department may be called upon to respond to emergencies within the LAPD's service area. Similarly, LAPD units may be called upon to assist police personnel to the County Sheriff Department. However, LAPD has primary responsibility over the City of Los Angeles.

3.0 EXISTING CONDITIONS

3.1 Los Angeles Police Department

Off-campus police protection services and on-campus calls for felony offenses are provided by the LAPD, which provides police protection within the jurisdictional boundaries of the City of Los Angeles.

The LAPD is divided into four bureaus: Central, West, Valley, and South. These four bureaus are subsequently sub-divided into 23 divisions. The Loyola Marymount University (LMU) campus is located within the Pacific Division (also called the Pacific Area) of the West Bureau and within Reporting District 1474.² The West Bureau is comprised of a 124 square-mile territory with a population of approximately 840,400 residents.³ The service area of the West Bureau is irregular in shape. The boundaries are, roughly, Forest Lawn Drive and Mulholland Drive to the north; Western Avenue, Normandie Avenue, Hoover Street and the City boundary to the east; the Santa Monica Freeway, City boundary, and El Segundo Boulevard to the south; and the Pacific Ocean and City boundary to the west.⁴ The Pacific Division currently covers 25.47 square miles and includes over 200,000 residents.⁵ The boundaries of the Pacific Division are the Pacific Ocean to the west, the Los Angeles/Santa Monica City boundary and the Santa Monica Freeway (I-10) to the north, and the Los Angeles City boundary to the south and east. The boundaries for Reporting District 1474 are as follows: former City of Los Angeles boundary along the

² Captain Paul A. Snell, Executive Commanding Officer, Office of the Chief of Police, Los Angeles Police Department, letter dated November 17, 2008. (Provided in **Appendix IV.J.**)

³ Los Angeles Police Department Web site, http://www.lapdonline.org/west_bureau/content_basic_view/1869.

⁴ Los Angeles Police Department website, "Our Communities: About West Bureau," and "Operations – West Bureau" Map. http://www.lapdonline.org/search_results/content_basic_view/1869. 2009.

⁵ Los Angeles Police Department Web site, http://www.lapdonline.org/pacific_community_police_station/content_basic_view/1600.

Westchester Bluffs to the north, Manchester Avenue to the south, Georgetown Avenue to the east, and Lincoln Boulevard to the west.⁶ The Pacific Community Police Station (Pacific Station), the closest station to the Project site, is located at 12312 Culver Boulevard, which is approximately 3 miles from the Project site.

The crime rate represents the number of crimes reported in an area over a given period of time and, thus, affects the anticipated needs, projection for staff, and equipment for the LAPD. Generally, the crime rate in a given area will increase as the level of activity or population intensifies. However, due to other factors, such as police presence, crime prevention measures, and ongoing legislation/funding, the potential for an increase in crime rate is not directly proportional to the increase in land use activity.

Crimes committed in Reporting District 1474, the Pacific Division, and Citywide are shown in **Table IV.J.1-1, Los Angeles Police Department Crimes by Reporting Area for 2007**. As shown, the predominant crimes in Reporting District 1474 were burglary from vehicle and grand theft; the predominant crime in the Pacific Division was grand theft; and the predominant crime Citywide was vehicle theft. With approximately 239,079 residents in the Pacific Division, the crime rate for the LAPD's Pacific Division was approximately 27 crimes per 1,000 residents, or 0.027 crimes per resident, in 2007.

Adequacy of police protection services for a given area is based on a combination of assessment factors, including officer to population ratio, type of land uses, response time, and available equipment.

The officer to population ratio is important from both a response and a prevention perspective. A higher officer-to-population ratio means that more officers are available to respond to calls as needed, thereby decreasing the response time. Conversely, if the officer-to-population ratio is reduced, it could mean that the average response time to emergency calls would increase. A high number of officers visibly serving and patrolling in the field may also act as a deterrent to crime because of greater police presence. In the Pacific Division, there were 292 patrol officers for 239,079 residents in 2007.⁷ This translates to 1.22 patrol officers per 1,000 residents.

⁶ Captain Paul A. Snell, November 17, 2008.

⁷ Captain Paul A. Snell, November 17, 2008.

**Table IV.J.1-1
Los Angeles Police Department Crimes by Reporting Area for 2007**

Types of Crimes	RD 1474		Pacific Division		Citywide	
Burglary from Businesses	1	1.19%	157	2.41%	3,441	2.64%
Burglary from Residences	14	16.67%	678	10.42%	13,721	10.51%
Burglary Other	6	7.14%	125	1.92%	2,485	1.90%
Rape	1	1.19%	40	0.61%	997	0.76%
Murder/Homicide	0	0.00%	8	0.12%	394	0.30%
Street Robbery	0	0.00%	285	4.38%	9,811	7.51%
Other Robbery	4	4.76%	167	2.57%	3,668	2.81%
Aggravated Assault	2	2.38%	265	4.07%	12,960	9.92%
Grand Theft	16	19.05%	1,236	19.00%	11,675	8.94%
Burglary from Vehicle	17	20.24%	897	13.79%	21,081	16.14%
Theft from Vehicle	6	7.14%	575	8.84%	9,482	7.26%
Theft From Person	0	0.00%	65	1.00%	1,049	0.80%
Purse Snatch	0	0.00%	4	0.06%	347	0.27%
Other Theft	6	7.14%	1,026	15.77%	14,513	11.11%
Vehicle Theft	10	11.90%	971	14.93%	24,391	18.68%
Bunco ¹	0	0.00%	5	0.08%	349	0.27%
Bike	0	0.00%	1	0.02%	221	0.17%
Total Crimes	83	100%	6,505	100.00%	130,585	100.00%

Source: Captain Paul A. Snell, Executive Commanding Officer, Office of the Chief of Police, Los Angeles Police Department, correspondence with Impact Sciences, Inc, November 17, 2008. (Provided in **Appendix IV.J.**)

¹ Bunco is defined as any scheme designed to cause the victim to believe they will profit financially (such as lottery scams, counterfeit gold/silver bar, jewels, or coins for cash). (Los Angeles Sheriff Department, Commercial Crimes Bureau, http://www.lasd.org/divisions/detective/commercialcrimes/CCB_Overview.html. 2009.)

Response time is another standard by which the adequacy of police service is evaluated. Response time is defined as the total time from when a call requesting assistance is made until the time the first unit responds to the scene. Calls for police assistance are prioritized based on the nature of the call. For example, a crime in progress may receive a higher priority than a call that is reporting a crime already committed. Also, the potential for harm to citizens is considered when a call is received. Unlike fire protection services, police units are often in a mobile state. As a result, actual distance between a headquarters facility and the site of an incident is of minimal relevance. Instead, the number of officers patrolling the street is more directly related to the realized response time. If the LAPD does not employ a sufficient number of officers, then the response time may increase.

The Los Angeles Police Department does not have an established goal for response times to emergency calls. In 2007, the Citywide average response time was 6.9 minutes and the Pacific Division's average response time was approximately 7.5 minutes.⁸ As described above, during times of emergency, crossover help from other divisions and from the Los Angeles County Sheriff's Department is available if necessary.

Equipment availability and training skills are also important factors in determining the adequacy of police protection services. Equipment and training skills impact the LAPD's ability to handle a situation efficiently. Inadequate equipment and training may result in longer response times or inefficient service. The addition of police officers does not ensure adequate service if officers do not have adequate training and equipment. As stated above, the Pacific Station is equipped with standard police equipment. The LAPD offers thorough training, including In-Service and specialized Peace Officers Standards and Training (POST) certified schools, Roll Call Training, Divisional Training Days and Management Development Advisory Board, including Supervisory Leadership Institute (Sergeants), FBI National Academy (Lieutenants), Command College (Captains and above), Hughes Advanced Leadership, Cristando House, and West Point Leadership.

3.2 LMU Campus

The Department of Public Safety supports the LAPD with calls for felony offenses any time members of the LMU community are involved and has an excellent working relationship with LAPD. LMU continues to benefit from an excellent working relationship with LAPD for mutual aid, jurisdictional issues, and any other relevant mutual assistance.⁹

The LMU Department of Public Safety provides first-response police protection services for the LMU campus. The Department of Public Safety, located in the Foley Annex Building, has a full service Campus Security Services Department operating 24 hours a day, 365 days a year. The Department employs a Chief, a Deputy Chief, four Captains or Managers of Public Safety, and six Lieutenants (who serve as patrol watch commanders and shift supervisors). The Department of Public Safety also employs a number of security officers who conduct foot and vehicle patrols of the campus and assist students, faculty, and staff with residence hall and office access. In addition, the Department of Public Safety employs LMU students who assist the staff with routine office functions and serve as after-hours campus escorts.

⁸ Captain Paul A. Snell, November 17, 2008.

⁹ Chief Hampton N. Cantrell, Department of Public Safety, Loyola Marymount University, personal communication on January 27, 2009.

The Department of Public Safety has a security booth located on LMU Drive approximately 100 feet from Lincoln Boulevard. The booth is manned by a Department of Public Safety officer 24 hours a day, 7 days a week. campus entry is routinely monitored and the LMU Drive gates are closed daily between the hours of 8:00 PM and 5:00 AM. The Department of Public Safety officer posted at the security booth allows entry when permits are displayed on vehicles driven by students, faculty, and staff entering campus. The officer posted at the security booth during typical business hours is informed of all expected campus activities each day. The officer assists visitors to the campus by providing a map indicating the location of their destination, issuing a guest pass, and recommending a parking area. After 8:00 PM, when the gate is closed, all visitors must stop at the booth and provide the officer with specific information regarding their reason for entering campus.

All Department of Public Safety staff, excluding students, are required to possess and maintain a license through the California Bureau of Security and Investigative Services and current first aid/CPR certification. The license maintained through Bureau of Security and Investigative Services is regulated by the Department of Consumer Affairs. Persons applying for the Bureau of Security and Investigative Services license are trained, tested and a background check is performed. The student workers are not required to have the Bureau of Security and Investigative Services license but may voluntarily enroll in first aid/CPR training.

In addition, several officers in the Department of Public Safety have completed the State 832 P.C. course (Laws of Arrest)¹⁰, are trained as Emergency Medical Technicians (EMTs), and are trained in light search and rescue. The Department of Public Safety also works collaboratively with the Los Angeles Police Department and the Los Angeles City Attorney to prevent and regulate any disruptive student behavior that occurs off-campus. Therefore, even though LMU Department of Public Safety officers do not possess arrest powers or act as police officers, their presence on and around the LMU campus provides additional support and protection to the LMU campus and the surrounding community. Due to the close distance and constant presence of the Department of Public Safety on the LMU campus, Department of Public Safety officers (who have training and experience addressing public safety) can respond quickly to incidents on campus. Department of Public Safety officers can conduct citizen's arrests for criminal incidents on campus, where the subjects are detained until local police officers arrive to take custody. Department of Public Safety officers have the authority to ask persons for identification and to determine whether individuals have lawful business at LMU. Parking Management officers have the authority to issue parking tickets, which are billed to financial accounts of students, faculty, and staff. The

¹⁰ Laws of Arrest is a course of training standards on the laws and methods of arrest and the use of firearms.

Department of Public Safety also has hired investigators to respond to and investigate activities of students who reside in the surrounding neighborhood.¹¹

As shown in **Table IV.J.1-2, LMU Department of Public Safety 2008 Crimes/Incidents**, the Department of Public Safety responded to approximately 588 calls for crimes/incidents, both on- and off-campus in 2008. In Fall 2008, there were approximately 6,868 full-time equivalent (FTE) students¹² and approximately 1,484 FTE faculty and staff¹³ on campus, for a total of approximately 8,352 FTE students, faculty, and staff on campus. With a total of 588 crimes/incidents in 2008, the LMU crime/incident rate was 0.07 crimes/incidents per FTE students, faculty, and staff in 2008.

**Table IV.J.1-2
LMU Department of Public Safety 2008 Crimes/Incidents**

Assault	12	Bias Motivated Incident	4	Harassment	22
Domestic Incident	16	Drug Law Violations	74	Miscellaneous ¹	18
Fraud	4	Grand Theft	25	Petty Theft	78
Liquor Law Violations	180	Sex Crimes	2	Vandalism	55
Robbery	5	Vehicle Theft	3	Weapon Violation	8
Trespass	13	Burglary	20	Vehicle Incidents	48

Source: Captain Cristina Martin, Department of Public Safety, Loyola Marymount University, personal communication, February 20, 2009.

¹ The miscellaneous category includes Department of Public Safety response to suspicious activity, disorderly conduct, missing person calls, disturbance/unauthorized party, and personal injuries.

¹¹ Chief Hampton N. Cantrell, January 27, 2009.

¹² FTE is a unit of measurement used to calculate enrollment for academic and master planning purposes, as opposed to student headcount. One undergraduate FTE student is defined as one undergraduate student taking 12 course units, which represents a full course load. Students taking fewer course units are considered to constitute a fraction of an FTE student, whereas students taking more than 12 units constitute more than one FTE student. One graduate FTE student is defined as one graduate student taking 9 course units, which represents a full course load. Graduate students taking fewer course units are considered to constitute a fraction of an FTE student, whereas students taking more than 9 units constitute more than one FTE student.

¹³ One full-time staff member works 40 hours per week. Two part-time staff members working 20 hours per week equals one FTE staff person. For faculty, one full-time faculty member is one FTE faculty member and three part-time faculty members equals one FTE faculty member.

The Department of Public Safety response time to emergency incidents on campus is within 1 to 3 minutes, considering the nature and location of the call. Additionally, in February 2008, LMU was ranked the fifth safest college campus by the Reader's Digest.¹⁴

LMU maintains an Emergency Preparedness Program and Emergency Management Guide which are managed by a full-time Emergency Preparedness Manager. The Chief of the Department of Public Safety has the authority to declare a campus emergency and act accordingly to preserve life, safety, and campus security. LMU has specific procedures that define LMU's response to natural or human-caused events. A network of LMU faculty and staff is trained in the Community Emergency Response Team program, which is given on campus by the Los Angeles Fire Department.¹⁵ Additionally, LMU maintains an Emergency Operations Center staffed by LMU representatives to coordinate a rapid response to a crisis. The Emergency Operations Center is established as center to respond to a catastrophic event, and is the centralized point of control and coordination for life-safety, infrastructure, and business management. The Emergency Operations Center is established when a crisis requires prolonged, ongoing management of an emergency incident, at a designated location with appropriate supplies to manage the incident.

During an emergency, the Department of Public Safety acts as the first responder to minimize injuries and loss of life. LMU utilizes multiple communication methods (e.g., Campus Alert system) to reach students, faculty, and staff. The Campus Alert system uses the following methods to alert students, faculty, and staff in the event of an emergency:

- Direct communications through Student Housing staff in all residence halls and apartments.
- Campus-wide e-mail announcements.
- Campus-wide voicemail announcements.
- LMU website (<http://www.lmu.edu>).
- LMU intranet (<http://my.lmu.edu>).
- Campus radio station (KXLU 88.9 FM)
- Campus cable television (ROAR Network).
- Department of Public Safety (310.338.2893).

¹⁴ Readers Digest, *Ranking the Safest (and Least Secure) College Campuses*, <http://www.rd.com/make-it-matter-make-a-difference/rd-campus-safety-survey-results-college-rankings/article53719.html>. 2008.

¹⁵ The logic of the Community Emergency Response Team training is that communities must be self-supporting for at least 72 hours when immediate help is not available from public agencies following any emergency.

Department of Public Safety officers are trained to utilize the Incident Command System and National Incident Management System¹⁶ in cases of emergency. The Incident Command System is an efficient on-site tool to manage all emergency response incidents related to oil spills or hazardous substance releases.¹⁷ The National Incident Management System is a national program that helps to work with governmental and private organizations to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life and property and harm to the environment.¹⁸

In the event of an emergency, the Department of Public Safety is able to secure public campus entrances within minutes. All student residence halls are secured by authorized card entry. When necessary, the Department of Public Safety partners with the Los Angeles Police and Fire Departments, County, state and other emergency service agencies to deal with emergency situations.

Additionally, the Department of Public Safety has several other programs and services including Safety Seminars, Lost and Found Service, Engraving Program, Safe Ride Home Program, Student Escort Service, Ride-Along Program, Vehicle Assistance, and Student Housing Lockouts. LMU also utilizes external experts to review and audit emergency procedures to ensure that they reflect best practices.

4.0 IMPACT ANALYSIS

4.1 Significance Thresholds

The *Los Angeles CEQA Thresholds Guide* states that the determination of significance with respect to police protection services should be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements on LAPD services, (facilities, equipment, and officers) and the project's proportional contribution to the demand; and

¹⁶ Incident Command System is training for the National Incident Management System. National Incident Management System provides a systematic, proactive approach to guide departments at all levels of government and nongovernmental organizations to work together during incidents to reduce the loss of life and property, and harm to the environment. (FEMA, About the National Incident Management System (NIMS), <http://www.fema.gov/emergency/nims/AboutNIMS.shtm>. 2009.)

¹⁷ US Department of Labor, Occupational Safety & Health Administration. *About ICS/UC and the NRS*, <http://www.osha.gov/SLTC/etools/ics/about.html>. 2008.

¹⁸ Federal Emergency Management Agency, *About National Incident Management System*, <http://www.fema.gov/emergency/nims/AboutNIMS.shtm>. 2008.

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

Appendix G of the State *CEQA Guidelines* provides sample questions for use in an initial study to determine a project’s potential for environmental impacts. According to the applicable sample question¹⁹ included in Appendix G under Section XIII Public Services, a project would have a potentially significant impact on police protection if it would:

XII.a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

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

- POL-1 The demand for police services, based on existing service levels, would be substantially exceeded within the Pacific Area; or
- POL-2 The Proposed Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

4.2 Methodology

Potential Project impacts were evaluated based on consultation with the LAPD to determine the adequacy of existing and anticipated staffing, equipment and facilities to meet the additional demand for police protection services resulting from development of the Proposed Master Plan Project. Although the LAPD does not maintain an internal minimum officer to population ratio, effects on the officer to population ratio and the net increase in reported incidents and calls for service were taken into consideration when determining the impact of the Proposed Project on police protection services.

19 The remainder of the Appendix G Public Services sample questions (XII.a.i,-iii, -iv, and -v) pertain to fire protection, schools, parks, and other public facilities. Fire protection and parks are addressed in **Sections IV.J.2, Fire Protection and Emergency Medical Services**, and **IV.J.3, Recreation and Parks**, respectively. The Initial Study prepared for the Proposed Project determined that the Proposed Project would have no impact with regard to Section VIII Public Services sample questions XIII.a.iii and -v, which pertain to schools and other public facilities. Therefore, these issue areas are discussed in **Section VII, Effects Found Not to be Significant**. The Initial Study is provided in **Appendix I**.

4.3 Project Design Features

As discussed above, the LMU Department of Public Safety provides first-response police protection services for the LMU campus and has a full service Campus Security Services Department operating 24 hours a day, 365 days a year. The Department of Public Safety has a security booth located off Lincoln Boulevard approximately 100 feet into campus. The Department of Public Safety also operates a network of security cameras on the campus. Also, all student residence halls are secured by authorized card entry. LMU maintains an Emergency Preparedness Program and Emergency Management Guide which are managed by a full-time Emergency Preparedness Manager. When necessary, the Department of Public Safety partners with agencies such as the Los Angeles Police and Fire Departments and any applicable County or state agencies.

4.4 Project Impacts

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|-------|--|
| POL-1 | Would the demand for police services, based on existing service levels, be substantially exceeded within the Pacific Area? |
| POL-2 | Would the Proposed Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives? |

4.4.1 Construction Impacts

Construction activities associated with implementation of the Proposed Master Plan Project would occur in a variety of locations on the campus over a period of 20 years. Anticipated crime and safety issues during construction include theft of building materials and construction equipment, malicious mischief, graffiti, and general vandalism. Such activities at a construction site are not unusual, but are only occasional and do not typically place undue demands on police protection services. Additionally, LMU's own 24-hour security patrol would guard against theft and vandalism at on-campus construction sites, further reducing demand on LAPD services. While the Proposed Project's construction impact on police services is considered less than significant, mitigation measure **MM-POL-1**, which requires the securing of construction sites and use of security lighting to deter theft and vandalism, is recommended to further increase safety and reduce potential impacts related to crime.

Construction worker parking would be provided at an off-site location in the campus vicinity, to minimize the number of construction-related trips onto the campus. A shuttle service would transport workers to and from campus in the morning and afternoon. No worker parking would be permitted on

residential streets. The transport of heavy-duty construction equipment onto campus would be minimized during construction. Although construction of the Proposed Project could cause traffic disruptions in the vicinity of the campus, hazardous conditions for auto travelers, pedestrians, or bus riders would not occur during construction. Additionally, most construction workers would arrive and depart the Proposed Project site during off-peak traffic hours (i.e., arriving prior to 7:00 AM and departing between 3:00 and 4:00 PM), thereby avoiding generating trips during the 7:00 to 9:00 AM and 4:00 to 6:00 PM peak traffic periods. Therefore, construction-worker trips generated during peak hour traffic periods in the vicinity of the site would be negligible.

As such, construction of the Proposed Master Plan Project could increase traffic both on and adjacent to the campus during typical weekday working hours as commuting construction workers, trucks, and other large construction vehicles could be added to normal traffic. Slow-moving, construction-related traffic on campus and surrounding roadways, as well as the potential for temporary construction-related obstruction of roadways on campus, may temporarily reduce optimal traffic flows on those roadways and could conceivably delay emergency vehicles traveling through the area. However, necessary construction equipment would be staged on campus and, other than commuting, would not impact local roadways. This potential construction impact to emergency access is considered minor given the periodic nature of construction traffic and the short-term duration of construction of individual buildings over a 20-year period. Additionally, LMU requires its contractors to employ standard construction site precautions to safeguard against disruption of traffic or other ongoing activities on and around campus. Emergency access to active construction sites would be maintained consistent with LAPD requirements. Construction impacts related to emergency access would be less than significant.

4.4.2 Operational Impacts

The Proposed Master Plan Project would increase the number of FTE students from the Fall 2008 enrollment of approximately 6,868 FTE students to the previously approved 7,800 FTE students enrollment cap (an increase of approximately 932 FTE students) and would provide an additional approximately 989 beds on campus. The Proposed Master Plan Project also proposes the addition of approximately 316 FTE faculty and staff. In total, there would be an increase of approximately 1,248 FTE students, faculty, and staff on campus.

The LAPD currently provides police protection services to the campus. In 2007, the Pacific Division provided services for a total population of approximately 239,079 residents. The increase of approximately 989 student residents on the LMU campus would represent a less than 0.41 percent increase in the Pacific Division's population over 2007 conditions. The 0.41 percent increase in population would result in a minimal decrease in the officer to population ratio. In 2007, there were 292 patrol

officers for 239,079 residents (a ratio of 1.221 patrol officers per 1,000 residents) in the Pacific Division. Adding 989 residents under the Proposed Project would change the ratio to 1.216 patrol officers per 1,000 residents. This analysis is likely conservative because a number of the new campus residents may already live within the boundaries of the LAPD's Pacific Division; therefore, these residents would not be new residents, but rather existing residents that would be relocated from elsewhere within the Pacific Division service area. The Proposed Project's impacts on the officer to population ratio at the Pacific Division would not be substantial and the impact would be less than significant.

As discussed above, LMU's 2008 crime/incident rate was approximately 0.07 per FTE students, faculty, and staff. The Proposed Master Plan Project would increase the number of FTE students, faculty, and staff by approximately 1,248. Thus, using the 2008 rate, Proposed Project buildout could result in an additional 87 incidents per year from the addition of 1,248 FTE students, faculty, and staff on campus at buildout. This represents an increase of 1.34 percent over the 6,505 incidents that occurred in 2007 in the Pacific Division, which is a minimal increase. This assessment is likely conservative since a number of the incidents (i.e., certain liquor law violations or petty theft) reported to the LMU Department of Public Safety likely are never reported to the LAPD. Therefore, the Proposed Project's impacts on the demand for police services in the Pacific Division would be less than significant.

Emergency access to LMU would be provided by the existing street system. City review of street widths, street lighting, and street signage would be based on an evaluation of requirements for the provision of emergency access. The Proposed Project would comply with all requirements with regard to emergency access. As such, impacts to emergency access would be less than significant. As discussed above, the LMU Department of Public Safety provides first-response police protection services for the LMU campus and operates 24 hours a day, 365 days a year, which serves to further reduce the Proposed Project's demand on the City's police services. LMU also maintains an Emergency Preparedness program and action plan and Emergency Management Guide. The Department of Public Safety officers are trained to utilize the Incident Command System and National Incident Management System in cases of emergency. Also as discussed above, the Department of Public Safety is able to secure public campus entrances within minutes. As discussed above, all student residence halls are secured by authorized card entry. The Department of Public Safety also has several other programs and services including Safety Seminars, Lost and Found Service, Engraving Program, Safe Ride Home Program, Student Escort Service, Ride-Along Program, Vehicle Assistance, and Student Housing Lockouts.

Additionally, the Department of Public Safety recently hired two investigators whose primary responsibility is to respond to activities of students who reside in the surrounding neighborhood, which would help to reduce impacts on the LAPD related to calls for service in the surrounding neighborhood. As LMU's Department of Public Safety provides several security and emergency services, and acts as a

first responder to incidents on campus and incidents involving LMU students, the Department of Public Safety further reduces the Proposed Project's demand on LAPD services.

Since Proposed Project implementation would not result in substantial additional demand for police services and impacts on LAPD services are therefore, anticipated to be less than significant, the provision of new or expanded police protection facilities would not be necessary, and potential impacts associated with the construction of new or expanded police protection facilities would accordingly be less than significant.

While the Proposed Project's operational impacts on police services are considered less than significant, mitigation measures have nevertheless been included to ensure that the Proposed Project has addressed potential issues in a manner that is satisfactory to the LAPD. LMU would provide the LAPD's Crime Prevention Unit with an opportunity to comment on security and crime prevention measures for the Proposed Project, as required by **MM-POL-2**. In order to help the Pacific Division's commanding officers during responses to emergencies, LMU would provide a diagram demonstrating access routes to each portion of the Proposed Project site and buildings, as required by **MM-POL-3**. Mitigation measures **MM-POL-2** and **MM-POL-3**, would ensure that operational impacts on the LAPD police services would remain less than significant.

4.5 Project Design Features and Mitigation Measures

PDF-POL-1 The LMU Department of Public Safety shall continue to provide first-response police protection services for the LMU campus and implement such security measures as maintaining a security booth located off Lincoln Boulevard, operating a network of security cameras on the campus, and securing all student resident halls by authorized key card entry.

While the Proposed Project's impacts would be less than significant, the following mitigation measures are proposed to ensure that impacts remain less than significant:

MM-POL-1 During Project construction, construction sites shall be secured with fencing and locked entrances. Construction equipment, tools and materials shall be secured by locking or placing them within sheds and/or other inaccessible areas while not in use. Construction sites shall be lighted as necessary at night to deter theft and vandalism.

MM-POL-2 Prior to the issuance of a building permit, the Los Angeles Police Department, Pacific Division, Crime Prevention Unit, shall have the opportunity to comment regarding security and crime prevention features.

MM-POL-3 Upon completion of each building or facility, a diagram of each completed building or facility shall be provided to the Los Angeles Police Department Pacific Division Commanding Officer. The diagram shall include access routes, building locations, and any additional information that would facilitate police response.

4.6 Level of Impact After Mitigation

Impacts would remain less than significant.

4.7 Cumulative Impacts

As discussed in **Section III, General Description of Environmental Setting**, several related projects are proposed and/or planned within the LAPD's Pacific Division. The anticipated number of residents expected as a result of these related projects is summarized in **Table IV.J.1-3, Residential Related Projects - LAPD Pacific Division**. The related projects within the City of Los Angeles would increase the number of residents in the Pacific Division from 239,079 by adding approximately 16,350 residents to the Pacific Division service area during the course of Proposed Master Plan Project buildout. As previously discussed, there were approximately 0.027 crimes per resident in the LAPD's Pacific Division in 2007. Therefore, buildout of the related residential projects in the City of Los Angeles would result in an increase of approximately 441.5 crimes per year. Combined with the 87 annual incidents that would result from an increase of 1,248 FTE students, faculty, and staff on the LMU campus, the cumulative increase in crimes would be 528.5 per year, or an increase of 8.1 percent above the 2007 rate of 6,505 crimes in the Pacific Division service area. This is not considered a substantial increase.

**Table IV.J.1-3
Residential Related Projects – LAPD Pacific Division**

Related Project No.	Size	Factor ¹	Residents
1	98 du	2.36 res/du	231
11	230 du	2.36 res/du	543
21	3,246 du	2.36 res/du	7,661
23	2,600 du	2.36 res/du	6,136
24	215 du	2.36 res/du	507
28	539 du	2.36 res/du	1,272
Total:			16,350

Source: Fehr & Peers, February 2009 and Impact Sciences, Inc.

Notes: du = dwelling unit; res = resident

¹ Average number of residents per household is 2.36 residents per unit, based on SCAG 2010 projections within the Westchester-Playa del Rey Community Plan boundary. An occupancy rate of 100 percent is assumed.

The assessment of LMU's contribution to cumulative impacts is likely conservative because some of the crimes/incidents reported to LMU Department of Public Service are also reported to the LAPD, so under this methodology such crimes/incidents would be accounted for twice. Additionally, a number of the incidents (i.e., certain liquor law violations or petty theft) reported to LMU Department of Public Safety likely would not be reported to the LAPD, so these incidents, although they are counted under the methodology here, would not divert LAPD resources. Finally, it is anticipated that a number of the students that would be housed on campus under the Proposed Master Plan Project already live within the boundaries of the LAPD's Pacific Division; therefore, at least some of the students to be housed on campus in the future would not be new residents, but rather existing residents that would relocate from elsewhere within the Pacific Division service area.

The Proposed Project plus related projects would increase the Pacific Division's residential population to 256,360, decreasing the 2007 ratio of 1.22 patrol officers per 1,000 residents to approximately 1.14 patrol officers per 1,000 residents, a minimal decrease. Moreover, each project is required to comply with all statutory regulations and is subject to review by the LAPD to ensure that adequate access, visibility, and security is provided. The Proposed Project would comply with all statutory regulations. Therefore, the Proposed Master Plan Project would not result in a cumulatively significant impact on police services.