

IV. Environmental Impact Analysis

J.1 Public Services—Police Protection

1. Introduction

This section describes existing police protection services within the Project Site and surrounding area and provides an analysis of potential impacts related to these services that would occur as a result of implementation of the Proposed Project. The focus of the analysis is on the Los Angeles Police Department (LAPD) facilities and staffing resources that currently serve the Project Site and the ability of the LAPD to provide adequate police protection services to the Proposed Project. This section is based on information provided by the LAPD Counter-Terrorism and Special Operations Bureau and Operations-Central Bureau (refer to Appendix U of this Draft EIR).

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations and guidelines that address the provision of police protection services in the City of Los Angeles. These local plans and guidelines include the Los Angeles General Plan Framework, the Central City Community Plan, the City of Los Angeles Charter and Administrative and Municipal Codes, as well as LAPD's Design Out Crime Guidelines. These plans and guidelines are intended to assure that there is adequate police services to meet the public safety needs of the City's various neighborhoods. These plans, regulations and guidelines are provided in Appendix G of this Draft EIR.

b. Existing Conditions

(1) Overview of Existing LAPD Services

The LAPD, for the purposes of providing police protection services, divides the City into the following four bureaus: Central; West; South; and Valley Bureaus. The four bureaus are further divided into 21 service areas, which are serviced by the LAPD's 21 community police stations.¹ Within each service area, smaller geographic units referred

¹ *City of Los Angeles Police Department, Media Relations Handbook, available at www.lapdonline.org/search_results/content_basic_view/2023, accessed September 12, 2011.*

to as Reporting Districts (RD) are used for resource deployment purposes as well as to assist in compiling statistical data. The LAPD also includes a variety of support systems including the Direct Support Division, Special Operations, Municipal Division, SWAT, K-9, and Mounted Units.

As of April 2011, the total departmental staffing resources within the LAPD were 9,876 officers. Based on a total City population of 3,792,621 set forth by the 2010 census data, LAPD currently has an officer to population ratio of 2.6 officers for every 1,000 residents.

The Project Site is located in the Central Bureau service area, which covers an area of approximately 65 square miles in the eastern portion of the City and has a population of approximately 900,000 residents. The Central Bureau serves the communities within the downtown Los Angeles business district, Eagle Rock, MacArthur Park, Dodger Stadium, Griffith Park, Boyle Heights, and other surrounding areas. The five community police stations operated within the Central Bureau are the Central, Hollenbeck, Newton, Northeast, and Rampart Community Police Stations. The Central Bureau also oversees operations at the Central Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes on local streets throughout the Central Bureau service area.² All geographic divisions of the LAPD are fully and consistently staffed according to existing needs. The determination of those staffing needs is predicated upon the analysis of crime data, population density, and other specific demographic variables.

Table IV.J.1-1 on page IV.J.1-3 provides the name, location, population and staffing of the police stations serving the Project Site, as well as the distance of each of the police stations to the Project Site. The Project Site is primarily served by the Central Community Police Station, located at 215 E. 6th St., approximately 1.7 miles from the Project Site. The Central Community Police Station is staffed by approximately 419 sworn personnel of the LAPD and is responsible for all police operations in downtown Los Angeles. The officer to residential population ratio within the Central Area Community Police Station is 10.48 officers per 1,000 residents, which is much higher than the Citywide average. Figure IV.J.1-1 on page IV.J.1-4 depicts the geographic extent of the Central Station service area.

Several parking areas that may be used by the Proposed Project are located within the Newton Community Police Station service area. The Newton Community Police Station is located at 3400 South Central Avenue, approximately 3.25 miles from the Project

² *The Los Angeles Police Department, About Central Bureau, www.lapdonline.org/central_bureau/content_basic_view/1908, accessed September 12, 2011.*

**Table IV.J.1-1
Police Stations Serving Project Area**

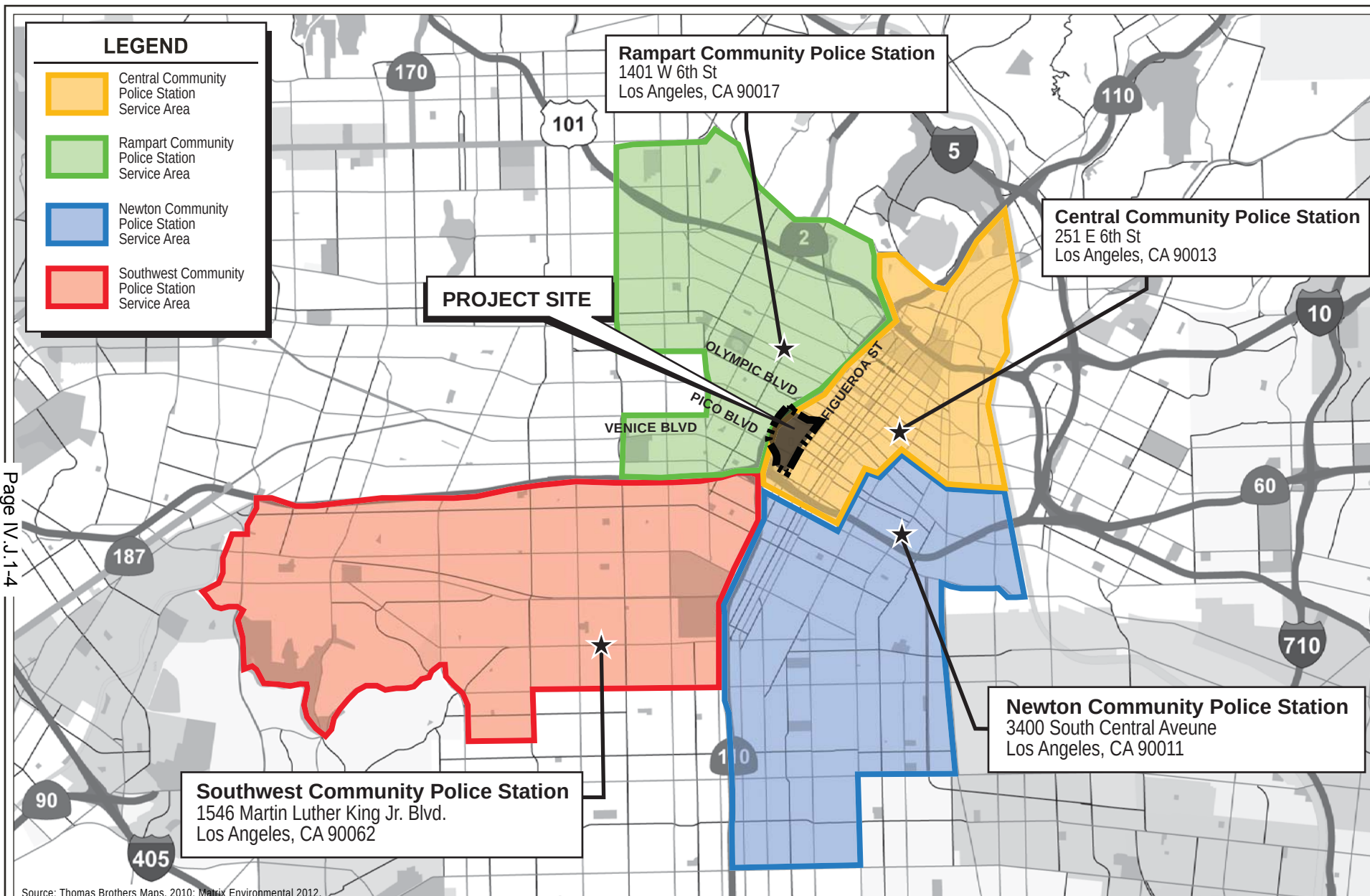
Station/Location	No. Sworn Personnel	Population Served	Officer-to-Population Ratio (Officers/1,000 Residents)	Distance to Site
Central Area Community Police Station 251 E. 6th Street Los Angeles, CA 90014	419	40,000	10.48	1.7 miles
Newton Community Police Station 3400 South Central Avenue Los Angeles, CA 90011	313	150,000	2.09	3.25 miles
Rampart Community Police Station 1401 W. 6th Street Los Angeles, CA 90017	278	164,961	1.69	1.25 miles
Southwest Community Police Station 1546 Martin Luther King Jr. Boulevard Los Angeles, CA 90062	355	165,000	2.15	3.2 miles
<i>Source: Written correspondence from LAPD, 2011, and http://www.lapdonline.org/, accessed February 16, 2012.</i>				

Site. This station is staffed by approximately 313 sworn personnel. The officer to residential population ratio within the Newton Community Police Station service area is 2.09 officers per 1,000 residents.

The Southwest Community Police Station is located within LAPD's South Bureau, whereas the other police stations listed in Table IV.J.1-1 are located in the Central Bureau. As Table IV.J.1-1 lists police stations based on distance from the Project Site, the Southwest Community Police Station is located closer to the Project Site than the police stations located in the Central Bureau not listed in this table. The Southwest Community Police Station is located at 1546 Martin Luther King Jr. Boulevard, approximately 3.2 miles from the Project Site. This station is staffed by approximately 355 sworn personnel. The officer to residential population ratio within the Southwest Community Police Station service area is 2.15 officers per 1,000 residents.

As is standard protocol, in the event an emergency arises requiring increased staffing, additional officers would be called in from other LAPD community police stations. Surrounding station coverage areas are shown in Figure IV.J.1-1 on page IV.J.1-4. Staffing levels at the two neighboring stations of interest, as identified by the LAPD, are as follows:

- Rampart Community Police Station: 278 sworn personnel; and



- Southwest Community Police Station: 355 sworn personnel.

As shown in Table IV.J.1-1, the officer to residential population ratio within the Rampart Community Police Station service area is 1.69 officers per 1,000 residents, while the officer to residential population ratio within the Southwest Community Police Station service area is 2.15 officers per 1,000 residents.

At this time, there are no plans to expand the Central Community Station or any of the neighboring stations serving the Project area.

Crime statistics are compiled throughout the LAPD service area and are organized geographically by reporting districts. Two such districts encompass the Project Site—RD 181 and RD 191. Incidents reported in these two districts in recent years are listed in Table IV.J.1-2 on page IV.J.1-6.

Crime statistics for 2009 compiled for the police stations serving the Project vicinity are summarized by types of crimes in Table IV.J.1-3 on page IV.J.1-6. This data demonstrates that larceny (e.g., pick pocketing, purse snatching, shop lifting) is the predominant crime in the Project vicinity. This is also true city-wide, where approximately 48 percent of all reported incidents (Part I) are associated with larceny³

Several of the off-site parking lots and structures that may serve the Project Site are located within the Newton Community Police station service area. Thus, LAPD compiled the incident data for the reporting districts within the Central and Newton service areas that would serve the Project Site and the potential off-site parking areas. Based on this data, the identified reporting districts had a collective total of 7,940 incidents in 2009 and 7,649 incidents in 2010. Table IV.J.1-4 on page IV.J.1-7, provides a breakdown of this incident data by month.

The nearby Rampart area, on the opposite side of the Harbor Freeway, may be affected by pedestrian and vehicular traffic associated with events at the Project Site. LAPD annual crime statistics for the three nearest reporting districts covering the Rampart area (RDs 269, 279, 289, and 299) indicates 1,044 total reported incidents in 2009, and a total of 1,011 reported incidents in 2010.⁴

³ Los Angeles Police Department, Information Technology Division, Management Report Unit, Statistical Digest, 2009.

⁴ Written Correspondence from Charlie Beck, Chief of Police, July 26, 2011.

Table IV.J.1-2
Crime Incidents in Reporting Districts 181 and 191

	2006	2007	2008	2009	2010
RD 181	269	190	202	271	330
RD 191	140	151	111	94	107
<i>Source: Los Angeles Police Department, Administrative Services Bureau—Information Technology Division, June 2011.</i>					

Table IV.J.1-3
2009 Crimes by Police Station

Type of Crime	Central	Rampart	Newton	Southwest
Homicide	5	20	29	30
Forcible Rape	34	59	45	65
Larceny	2,173	1,873	1,931	3,252
Robbery	489	857	1,030	1,066
Aggravated Assault	421	429	1,045	926
Burglary	248	366	692	1,307
Vehicle Thefts	331	728	1,341	1,195
<i>Source: Los Angeles Police Department, Information Technology Division, Management Report Unit, Statistical Digest 2009.</i>				

The average citywide response time for emergency calls for service, identified by the LAPD Communications Division (2010 calendar year), and assigned Code Two or Code Three response status, are 17.1 minutes and 6.1 minutes, respectively. A Code Two response is defined as an immediate response to incidents of major police importance, without delay, but in observance of all rules of the road, and without the use of vehicle emergency lighting equipment or siren. A Code Three response is defined as the use of forward facing red light and siren during the operation of a police vehicle to respond to incidents requiring immediate police presence and/or assistance.

In 2010, the average response time for Central Area service requests in RD 181 was 7.816 minutes for Code Two, and 3.225 minutes for Code Three calls for service. The average response time for the Central Area's RD 191 in 2010 was 14.633 minutes for Code Two, and 6.425 minutes for Code Three calls for service. In the 23 reporting districts that would serve the Project Site and associated off-site parking areas, average response times in 2010 were 11.344 for Code Two calls for service and 4.908 minutes for Code Three calls

Table IV.J.1-4
Reported Crime Totals
for Reporting Districts Serving the Proposed Project
2009–2010

Month	2009	2010
January	689	569
February	526	546
March	700	632
April	703	626
May	711	661
June	750	781
July	701	739
August	632	575
September	670	593
October	663	686
November	589	631
December	606	610
Total	7,940	7,649
<i>Source: LAPD, July 20, 2011. Data shown is for Reporting Districts 141, 151, 161, 171, 181, 191, 142, 152, 162, 182, 192, 134, 135, 143, 144, 145, 153, 154, 164, 163, 174, 185, 195, and 1321.</i>		

for service. Throughout the Central Division, average response times (2010) were 4.467 minutes for Code Three calls for service and 12.142 minutes for Code Two calls for service. In addition, throughout the Newton Division, average response times (2010) were slightly longer at 5.567 minutes for Code Three calls for service and 17.025 minutes for Code Two calls for service.

(2) City of Los Angeles Emergency Management Committee

The City of Los Angeles has an Emergency Management Committee (EMC), chaired by the Emergency Management Department (EMD). Its members consist of the LAPD and LAFD, and of the other City departments such as General Services, Recreation and Parks, Water and Power, Transportation, Airports, Port of Los Angeles, and others to coordinate the City's emergency planning. The EMC handles issues via subcommittees on disaster planning, community outreach, information technology, shelter and welfare, planning, operations, logistics, and training, all to better prepare to respond to, mitigate and recover from disasters. The EMC coordinates the development of the City's emergency plans, including plans and programs specific to tsunamis, earthquakes and brushfires, as

well as mass evacuation and mass care and shelter. Ongoing disaster preparedness efforts include:

- Maintaining comprehensive catastrophic disaster plans, situational awareness, and current status of readiness of all stakeholders.
- Capabilities assessment of all stakeholders throughout the five county regions.
- Continuous briefings, evaluation, training, exercises and review of current planning efforts, through review and assessment.
- Sector specific disaster planning working groups that include:
 - Cal EMA’s Southern California Catastrophic Earthquake Response Plan;
 - Countywide Catastrophic disaster working groups (e.g., LA Operational Area Alliance);
 - Local and wide-area communication and notification (e.g., reverse 911 and Alert LA, social media, and public services announcements);
 - Mass Evacuation and transportation planning;
 - Access and Functional Needs (AFN) (handicap) community planning;
 - Prediction, planning and mitigation efforts of scenario specific impacts to the Los Angeles region (e.g., earthquake, tsunami, wildfires, floods, landslide, severe weather, chemical-biological-radiological-nuclear-explosive (CBRNE) incidents, terrorism, pandemic illness and civil unrest); and
 - Mass Care (includes sheltering).
- Full assessment of infrastructure and key facilities critical in the continuity of operations and daily life sustaining needs (e.g., water, power, sanitation, emergency medical services, public health).
- Improving the capabilities of all stakeholders through continuous information and situation briefings and detailed research into lessons learned from disasters worldwide (e.g., Hurricane Katrina, the Chilean Earthquake, and other disasters).
- Improving First Responder safety and the ability to sustain emergency operations within Los Angeles during a catastrophic disaster.
- Volunteer and donation management (FEMA whole community concept).
- Citywide Points of Distribution (PODs) of medical supplies.

- Exercises and Training.

3. Project Impacts

a. Methodology

The determination of significance relative to impacts on police protection services is based on the ability of police personnel to adequately serve the existing and future population, including residents, workers, and daytime and nighttime visitors. Per the *City of Los Angeles 2006 CEQA Thresholds Guide* and using data provided by the LAPD, potential impacts to police protection services were evaluated based on two criteria: (1) the ability of the LAPD to meet the demand for police protection services anticipated at the time of Project buildout; and (2) the ability of the Proposed Project's proposed security and/or design features to reduce expected demand for police services.

As the Proposed Project does not include residential uses, permanent residents would not be generated within the Project Site. Therefore, it is not practical or useful to calculate estimated police protection demands on the basis of a conventional quantitative factor such as an officers-to-population ratio. Instead, based on input from LAPD, this analysis addresses the kinds of criminal incidents, public safety concerns and emergency and disaster scenarios that could occur within the Project Site and evaluates whether the level of resources needed to provide effective security oversight and emergency response would be provided.

b. Significance Thresholds

Appendix G of the *CEQA Guidelines* provides a sample question that addresses impacts with regard to police protection service. This question is as follows:

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

- *Police Protection?*

In the context of this question, the *City of Los Angeles CEQA Thresholds Guide* states that the determination of significance with regard to impacts on police services shall be made on a case-by-case basis, considering the following factors:

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

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

- The Project would generate demand for additional police protection services that substantially exceeds the capability of the LAPD to serve the Project Site.

c. Project Design Features

(1) Construction

During construction of the Proposed Project, the Applicants would implement private security measures including security fencing, lighting, locked entry, and security patrol on the site. In addition, as discussed in Section IV.B.1, Transportation, of this Draft EIR, a construction Transportation Management Plan would be prepared to ensure emergency vehicle access during all aspects of Project construction, including, but not limited to, the use of flaggers during partial closures to streets surrounding the Project Site to facilitate the traffic flow until construction is complete.

(2) Operation

A preliminary Comprehensive Security Plan (CSP) has been developed for the Proposed Project in consultation with the LAPD and the City of Los Angeles Department of Building and Safety (LADBS). The preliminary CSP is designed to reduce demands on police services by maintaining law and order, promoting safety and security among attendees and the surrounding community, implementing and maintaining an effective access and control program, deterring disruptive behavior, maintaining effective emergency response resources, and establishing and enforcing internal venue event policies. The preliminary CSP incorporates a variety of long-term operational strategies, and includes consideration of potential impacts resulting from concurrent multiple large scale events in the greater downtown Los Angeles area. Specific design, operational, and programmatic measures have also been included in the preliminary CSP to enhance and expand security

through LAPD and private resources, enhance response to criminal incidents and emergencies of various kinds, provide for large crowd management, reduce potential conflicts between vehicles and pedestrians, and establish an effective and integrated means of command and control that benefits the entire Central City area.

The preliminary CSP expressly prohibits traditional tailgating activities within all parking facilities that are under the direct control of the Applicants. Rather, the Event Center Applicant proposes to provide pre-game festivities in more of a communal environment within the Project Site and the Los Angeles Sports & Entertainment District Specific Plan area that supports existing and future local businesses. Specifically, the Event Center Applicant would host pre-game festivities within the public plazas that connect the on-site buildings, as well as at adjacent and nearby existing and future businesses such as those found within L.A. LIVE, as well as along Figueroa Street and the other streets surrounding the Project Site.

The preliminary CSP would be further refined and finalized as the Proposed Project proceeds through its final design phases and prior to operation through consultation with the California Department of Transportation (Caltrans), Los Angeles Fire Department (LAFD), Los Angeles Department of Transportation (LADOT), California Highway Patrol (CHP), Los Angeles County Sheriff's Department (LASD), and the Metropolitan Transit Authority (Metro). The Applicants shall implement the final CSP during operation of the Proposed Project. The final CSP shall include the specific project design features listed below related to police protection and public safety.

(a) Continuation of Existing Security Features

As part of operations within the Project Site, the Applicants would continue to implement the following security features that currently exist within the Project Site:

- Within the on-site buildings under their respective control, the Applicants would each provide a highly trained private security force would handle security needs within the buildings. The Applicants would expand the existing security force based on consultation with LAPD. Consistent with current practice, this security force would be supplemented with off-duty LAPD officers as necessary. The security force would patrol the site, including the parking structures, during events as needed.
- The Applicants would continue to contribute financially to the Business Improvement District (BID), which funds security patrols in the Project area, based on the BID's current assessment requirements. These security patrols would consist of a security team that patrols the sidewalks, parking structures, and parking lots.

- The Applicants would fund the deployment of LADOT traffic control officers during events pursuant to an agreement to be entered into with LADOT.

(b) Design Out Crime Guidelines

The Proposed Project would be designed to incorporate the LAPD's Design Out Crime Guidelines, which, as described in the Regulatory Framework included in Appendix G, are based on the following three key concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

(c) Crowd Management

Crowd management features would be implemented as part of the Proposed Project to minimize the number of police personnel required to secure events, facilitate crowd management strategies as needed, and minimize conflicts between pedestrian crowds and traffic. These crowd management features would be implemented as part of the Transportation Management Plan presented in Section IV.B.1, Transportation, of this Draft EIR. This Plan would build on the successful Transportation Management Plan developed and in operation for STAPLES Center and L.A. LIVE. The Applicants would also implement the temporary street closures set forth in Section IV.B.3, Pedestrian Safety, of this Draft EIR, to manage pedestrian flows and ensure pedestrian safety. In addition, the CSP shall include the following crowd management features:

- Install temporary vehicle barrier systems, as necessary and applicable.
- Secure driveways/access to loading areas..
- Create exclusive and VIP parking areas, minimizing personnel requirements.
- Install wayfinding and informational signage to direct individuals and communicate to large crowds of people.
- Develop template strategic plans for high profile events.
- Prohibit traditional tailgating activities within any and all parking facilities that are under the direct control of the Applicants.

- Provide ongoing training for vendors of alcoholic beverages to ensure compliance with current California Alcoholic Beverage Control (ABC) requirements.
- Include a holding facility/secure interview room in the Event Center.

(d) Traffic and Pedestrian Flow

Traffic and pedestrian flow features would be implemented as part of the TMP, which shall be developed in partnership with LADOT, LAPD, Metro, Caltrans, CHP, Los Angeles Emergency Management Department (LAEMD), and public safety stakeholders, transportation and traffic plans. The TMP is more particularly described in Section IV.B.1, Transportation.

(e) Event Management/Command and Control/Unified Field Command Center

A Unified Field Command Center shall be implemented as part of the Proposed Project as follows:

- Establish an approximate 2,000 square-foot dedicated Unified Field Command Center for management and control of a unified command during large special events. From this Center, both Applicants and affected agencies including LAPD, LADOT, Metro, LAFD, Caltrans, CHP, LAEMD, and Federal Bureau of Investigation (FBI), would be able to monitor pedestrian, transit, and vehicle traffic and other events as they unfold, and make coordinated and united decisions. The establishment of an integrated command area would provide for an environment to facilitate successful collaboration of these entities and have an overall cost savings to LAPD and the City. The Unified Field Command Center would include the following components: monitors for the various agencies, voice and data connectivity, flexible workspace furniture, 2-3 breakout/meeting rooms, and restrooms. It would be designed to supplement or augment the existing camera center located within STAPLES Center, and the existing operations and management centers of each of the agencies. .
- Identify and define employment and chain-of command protocols for off-duty employment and on-duty contract service employment of LAPD and other personnel.

- Train event management and security supervisors in unified command and Incident Command System (ICS) structure.⁵
- Train executive management in Advance Incident Management (ICS 300 and 400).
- Partner with LAPD in the development of internal security plans for the Project Site.
- Contract with a medical service (EMT) provider to be present during all events in the Event Center.
- Provide for emergency translation services, including bilingual security person.
- Staff the Event Operations Center with trained security personnel to monitor video feeds from surveillance cameras in and around the venue, prepare incident reports, and monitor alarms, communication systems.
- Conduct periodic exercises with governmental agencies that simulate possible circumstances that may occur within the Project Site.

(f) Terrorist Attack Response

The success of the Project's critical infrastructure and key resources (CI/KR) protection program would be facilitated through initial early design planning, prior to the beginning of actual construction. Many of the strategies, technologies, systems and programs put into the development and construction of the Proposed Project would also assist in mitigating the impact caused by a natural disaster or other event. If an incident does occur, well thought out pre-incident prevention planning would assist in expediting recovery, assist in a return to normalcy, and lessen the long-term financial impact caused by a terrorist incident. Measures would include the following:

- Convene a fully integrated Facility Design Team, partnering all stakeholders (i.e., law enforcement (local and state), fire service, LADOT, LAEMD, both Applicants, public and private transportation operators, Caltrans, the Project coordinators, design architects and other entities identified during the process) for a full review

⁵ *The Incident Command System (ICS) is a standardized, on-scene, all-hazards incident management approach that: (1) allows for the integration of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure; (2) enables a coordinated response among various jurisdictions and functional agencies, both public and private; and (3) establishes common processes for planning and managing resources.*

of construction and landscape architecture master plans and proposed development.

- LAPD Operation Archangel would complete a full infrastructure vulnerability assessment which would be entered into the Automated Critical Asset Management System (ACAMS) and provide data with regard to federal Protected Critical Infrastructure Information (PCII) status.^{6, 7}
- In coordination with LAPD, identify a secure staging location for storage and pre-staging of special operations first responders (i.e., Bomb Squad, Hazmat, Explosive Detection K-9, and Tactical Support Elements). This staging location will serve as a holding area for these entities' response trucks and dedicated equipment on site at the Project Site during an event.
- For Spectator Events, utilize state of the art screening technology that includes protocols and procedures developed in consultation with the Integrated Facility Design Team described above. Similar to current procedures in place at STAPLES Center, the screening system would include appropriate and sufficient queuing areas allowing for smooth, timely and safe entry into the applicable venue.

(g) Unified Emergency Response and Documentation.

Additional ongoing training programs will be developed with a specific focus on the California Large Stadium Initiative (CA-LSI), emergency response, evacuation, hazardous devices, Access and Functional Needs population, active terrorist attack response, and natural disaster and special event response, including the following:⁸

- Bi-yearly CA-LSI All Hazard Training for all public agencies and private entities responsible for the protection and emergency response of the Project venue.
- Geo-map the Project venues and surrounding area to improve the situational awareness of governmental agencies with jurisdiction.

⁶ Operation Archangel is an existing program that was developed by LAPD to identify and protect critical infrastructure and key resources in the Los Angeles metropolitan area. Its purpose is to defend likely targets against catastrophic terrorist attacks.

⁷ ACAMS is a secure interoperable web-based system to manage critical asset information.

⁸ In 2004, the California Office of Homeland Security began the Large Stadium Initiative (CA-LSI). Originally, the LSI program was focused on the specific stadium properties and specific events that rose to high profile status. The program has since evolved into a multi-event, multi-venue program utilizing an all hazards approach to public safety.

- Specific planning for persons with Access and Functional Needs (AFN), which could consist of the following:
 - State-of-the-art Project venue development and design to assist in AFN movement during an emergency.
 - Robust communication capabilities specifically for the AFN.
 - AFN public messaging and training on expectations during an emergency.
 - AFN debarkation transportation locations, which provide safety during a public disturbance (interior and exterior), evacuations and so on.

d. Analysis of Project Impacts

(1) Construction Impacts

During the Proposed Project's construction period, construction activity at the Project Site could potentially affect emergency vehicle access within the Project area. Construction traffic, for example, would include numerous small, medium and large trucks at various times to deliver and remove materials and equipment and to haul away soil, demolition and other construction waste materials. Additional traffic would be generated on a daily basis as construction work crews travel in and depart the construction site. This construction traffic could add to congestion problems on the surrounding street and highway network, especially if it were to occur during regular peak hours, and could also impede traffic flow and possibly emergency vehicle access, within and near the Project Site. In addition, construction activities may involve temporary lane closures for Project construction and utility improvements. Other implications of construction-related traffic include increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction (i.e., for the movement of construction equipment, and hauling of demolition and earth materials). Potential traffic problems could be compounded during those construction phases that occur at the same time as a major daytime event is occurring within the Project Site or at a nearby venue. Thus, Project construction could impact established perimeters, traffic routes and staging areas of event staff, LAPD, LAFD, and other public safety entities tasked with working these events. LAPD personnel might be required to provide on-site traffic control and assistance at various times, even with a well-planned construction traffic control program and employment of flaggers and a variety of other traffic controls by the construction teams.

As discussed in Section IV.B.1, Transportation, of this Draft EIR, during construction of the Proposed Project, a construction traffic management program will be implemented to ensure that adequate and safe access and parking remains available within the Project

Site and surrounding area during construction activities. As part of this program, traffic management personnel (flaggers) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. In addition, truck queuing, equipment staging, and construction worker parking would be confined to the Project Site (off-street) and/or would occur at a nearby off-site lot or lots or streets, in order to minimize disruptions to emergency access. Furthermore, adequate emergency access along adjacent roadways would be provided throughout the construction process, consistent with LAFD requirements. The LAPD would also be notified of the days, times, and locations of any lane closures, and appropriate detour signage would be employed as necessary to ensure emergency access is maintained to the Project Site and that traffic flow is maintained on adjacent street rights-of-way. With implementation of these project design features, together with the features set forth in the Project's Construction Traffic Management Plan set forth in Section IV.B-1, Transportation, of this Draft EIR, emergency access impacts from construction activities would be less than significant.

On-site storage of construction materials, equipment, vehicles, temporary offices, or other communication centers could be the objects of attempted thefts and vandalism. However, in accordance with the project design features set forth above, which include security features, such as fencing all construction areas prior to the start of construction, providing security lighting at construction areas, and providing on-site security personnel at construction sites, such impacts would be less than significant.

Project construction would result in a temporary increase in the number of workers to the Project area. It is anticipated that 12,000 jobs would be directly associated with the construction of the Proposed Project. Thus, there is the potential for an increased demand for LAPD services. However, this increase is expected be negligible, as construction workers would be occupied with construction activities during work hours and would likely return to their place of residence upon completion of daily construction activities. Therefore, construction-related impacts associated with police protection services would be less than significant.

(2) Long-Term Operational Impacts

The Proposed Project includes development of the New Hall that would provide more functional space within the convention center, as well as the Event Center that would provide for roughly 245,650 square feet of Rentable Area used for exhibition and meeting room space or up to 76,250 seats when used for major Spectator Events. Thus, the Proposed Project would result in various types and sizes of events within the Project Site, which would also result in a varied demand for police resources throughout the year. In addition, if events within the Project Site occur simultaneously with other major special

events in the Los Angeles area (e.g., Dodgers Stadium, the Coliseum, the Sports Arena and other smaller venues in the greater downtown Los Angeles area), there is a potential for a substantial number of visitors to be present in this area at a given time.

Based on LAPD's review of the Proposed Project plans and programs, specific issues related to police protection that are addressed herein include crime, crowd management, traffic flow, communication and command operations, natural disasters, and the potential for terrorist attacks. An evaluation of each of these topics is provided below.

(a) Crime

LAPD has found that, over time, large parking areas associated with major gathering events have experienced increased instances of vehicle-related crime, including burglary and theft from motor vehicles, grand theft auto and personal theft. Consistent with this experience, the LAPD notes that the predominant crime type in the Project area is currently property crime, including burglary from motor vehicles, theft from motor vehicles, grand theft auto, and personal theft. In most situations, these are crimes of opportunity, whereby victims leave valuable property in a vehicle in a public area, or have their vehicle, or vehicle components, taken while parked in a parking lot. The LAPD has stated that although most people who live and work in the Project area are hard-working, law-abiding citizens, the increases in numbers of people and vehicles in the area generated by the Proposed Project would result in a potential increase in these types of crimes.

Large entertainment venues are often the scene of ticket scalping, fraud, pick-pocketing, theft of property and merchandise, and other civil and criminal violations. With the increases in the number and size of events that would occur within the Project Site, LAPD indicates that these types of crimes could occur more frequently. This increased frequency has the potential to result in an impact on police protection services.

Tailgating (i.e., drinking (sometimes alcohol) and eating in small groups within vehicle parking areas prior to an event), is an activity that is often associated with sporting venues. Such activities can lead to drunk and disorderly conduct in the parking lots, en route to the Event Center and at the Event Center. Thus, tailgating also has the potential to result in increased demand for police protection services. However, it is an explicit objective of the Proposed Project to reinvent the fan's game-day experience. Tailgating, in large part, occurs as facilities are typically located in areas which lack the commercial businesses to support the demand for pre-game festivities. As a result, fans are left with no choice but to bring the festivities with them to the game, hence the origins of tailgating. In recognition of the role of pre-game festivities in terms of the fan's overall game day experience, it is an explicit objective of the Event Center Applicant to reinvent the game day experience by celebrating pre-game festivities in more of a communal environment that

builds community spirit as well as supporting existing and future local businesses. The Event Center Applicant proposes to realize this objective via hosting pre-game festivities within the public plazas that connect the on-site buildings, as well as through and at adjacent and nearby existing and future businesses such as those found within L.A. LIVE, as well as along Figueroa Street and the other streets surrounding the Project Site. To further advance this new concept of urban tailgating, both Applicants would expressly prohibit traditional tailgating activities within any and all parking facilities that are under their direct control.

Further, the crimes described above would be minimized through the implementation of the CSP and associated project design features. As described above, the CSP addresses crime prevention education, coordinated parking, use of camera systems, coordinated public safety and security, the safety of the area, planning and contractual agreement regarding private security personnel, state-of-the-art design, and the use of cameras utilizing behavior identification/predictive software. With implementation of the CSP and associated project design features, crime impacts associated with the Proposed Project would be reduced to a less than significant level.

(b) Crowd Management

The Proposed Project would result in an increase in the number and frequency of events within the Project Site, and on some days would attract a larger number of people when compared with existing conditions. Thus, LAPD has indicated that crowd management and control must be addressed. LAPD indicates that the degree to which crowd management and crowd control is developed has an impact upon the immediate and adjacent residential and business concerns, as well as the managed event and venue. LAPD's concern about crowd management is also compounded when accounting for simultaneous events occurring at venues outside of the Project Site. A primary issue with crowd control is the management of heavy volumes of pedestrian traffic, interspersed with vehicle traffic, and the interface between the two. When LAPD staff is utilized for existing events within the Project Site, an exhaustive planning and deployment process is implemented. Thus, crowd management associated with the Proposed Project has the potential to create an additional demand for LAPD services.

As discussed above, crowd management features would be implemented as part of the Proposed Project to minimize the number of police personnel required to secure special events, facilitate crowd management strategies as needed, and minimize the effect of pedestrian crowds on traffic. These crowd management features would be implemented as part of the CSP described above and the Transportation Management Plan presented in Sections IV.B.1, Transportation The Applicants would also implement the temporary street closures set forth in Section IV.B.3, Pedestrian Safety, of this Draft EIR. Implementation of

these crowd management features would reduce potential impacts to less than significant levels.

(c) Traffic Flow and Management

Concurrent events within the Event Center, the Convention Center, Staples Center and other nearby venues in the area have the potential to impact traffic flow in the Project vicinity. According to the CHP, under the current conditions, highly attended events held in the vicinity (Coliseum, Sports Arena, Dodger Stadium), concurrent with events held at STAPLES Center, the Convention Center, and L.A. LIVE, impact traffic congestion on nearby freeways. This impact has the potential to worsen, due to the increase in frequency of events and volumes of attendance on certain days that would occur with development of the Proposed Project. In addition, the LAPD indicates that as visitors from the high-profile events at the Project Site and from the lodging, restaurant, and retail establishments in the immediate vicinity leave the Project area, large numbers of visitors could also be entering the Project area to go to the other entertainment, lodging, and businesses. Thus, the traffic and pedestrian plans routinely used during STAPLES Center events would require modification to facilitate the additional events held at the Project Site. Supplemental parking, identified as within 20 minutes walking time from the venue, exists primarily to the north, east, and south of the Proposed Project.

While the Transportation Management Plan would discourage traffic intrusion and parking in adjacent areas such as Pico-Union, it would be reasonable to assume, based upon proximity to the Proposed Project, that visitors to the venue may also utilize, as available, parking in the area served by the Rampart Community Police Station, west of the SR-110 freeway, and to a lesser degree, parking along the Figueroa Street corridor within the area served by the Southwest Community Police Station to the south. Thus, the Proposed Project would have the potential to result in increased demand for police protection services at these police stations in addition to the Central Area and Newton Stations that serve the Project Site and its designated parking areas. However, as set forth in Mitigation Measure B.1-9 of Section IV.B.1, Transportation, of this Draft EIR, the Proposed Project would implement a Neighborhood Traffic and Parking Management Program to reduce potential parking and traffic impacts in such areas. This plan would also reduce demand for police services, and such impacts would be less than significant.

As discussed above, traffic flow features would be implemented as part of the TMP presented in Section IV.B.1, Transportation, of this Draft EIR. As set forth in that Section and above, the TMP would include directional and informational signage, use of traffic cameras to provide real-time traffic information to the personnel staffing the Unified Field Command Center, and measures to encourage the use of transit. With implementation of the proposed traffic flow features, impacts on police protection services associated with traffic flow and management would be reduced to less than significant levels.

(d) Event Management and Command Operations

As described above, LAPD utilizes well planned concepts of operations, advance technology and innovative approaches to provide improved command and control of its personnel and resources. This allows the LAPD to provide substantially increased capabilities to address many of the public safety challenges that the Proposed Project presents. LAPD has stated that policing and securing the Project Site would be complex and dynamic, requiring the collective capabilities and efforts of many organizations. Utilization of the most current technologies would assist in equipping LAPD, LADOT, LAFD, CHP, both Applicants' private security, the BID, and others to ensure the safety of event visitors and participants, while at the same time reducing the level of security resources needed to accomplish that objective. Strategic use of innovative, state-of-the-art technologies would contribute towards ensuring the safety of the Project Site.

As set forth above, the CSP would include features related to event management. These features include a dedicated Unified Field Command Center, training of event management and security supervisors, and partnerships in the development of internal security plans. With implementation of these CSP and associated project design features, impacts on LAPD services associated with command and control would be less than significant.

(e) Terrorist Attack Response

LAPD has stated that protecting and ensuring the continuity of operations of critical infrastructure and key resources (CI/KR) is essential to the City of Los Angeles security, public health and safety, economic vitality, and way of life. CI/KR are defined as the assets, systems, and networks, whether physical or virtual, so vital that their incapacitation or destruction would have a debilitating effect on security, national economic security, public health or safety, or any combination thereof. Within this definition lies 18 identified sectors, including the Commercial Facilities and Mass Gathering Venues, also known as soft targets. The Proposed Project would be classified as a Mass Gathering Venue/soft target. Local, state, and federal law enforcement agencies have indicated that soft targets are a priority for terrorists determined to inflict damage within the United States. Soft targets are generally not subject to the same special protection that other sectors of infrastructure sites receive, unless there has been a specific threat. However, a successful attack upon a soft target can cause many human injuries and fatalities, cause fear and panic in the public with an associated financial impact.

Prevention of a terrorist attack is a combination of multiple proactive systems and programs all working together to detect, deter, prevent, protect against, and mitigate the consequences of potential incidents. LAPD states that this must be done through an All Hazards approach, and the ongoing review and situational awareness of all terrorist attack

strategies and trends worldwide. It is estimated that the private sector owns and operates 85 percent of the country's CI/KR. As such, a robust public-private partnership is essential to achieve a fully integrated terrorism prevention program at the Project Site. LAPD indicates that this can only be accomplished through shared responsibility in the design and operation of the Project venue, a thorough assessment of its supporting infrastructure, identification and installation of state-of-the-art command and control strategies and security technology, continuous process improvement of preparedness strategies, planning and information sharing, ongoing integrated public/private personnel training, and year-round real-time situational awareness in partnership with local, regional, state, and federal agencies.

As discussed above, the CSP would include features to address potential terrorist threats. These features include early design planning prior to the beginning of actual construction, development of a Unified Field Command Center, identification of secure staging areas for responders, and screening. With implementation of the CSP and associated project design feature, impacts to police protection resources resulting from prevention and response to terrorist threats would be reduced to a less than significant level.

(f) Natural Disasters, Special Events and Unified Emergency Response

The City of Los Angeles is an area susceptible to natural disasters such as earthquakes, wildfires, and severe weather, and human induced events. In addition to natural events that could rise to the level of disaster, the City has numerous large-scale special events (including demonstrations) that occur throughout the year. LAPD indicates that these incidents (spontaneous) and events (preplanned) require a substantial response of personnel and equipment from the LAPD and LAFD. In the case of no warning or short notice incidents, there may be little time to obtain personnel and equipment from external sources to support a large-scale rapid response. This would be further compounded by the size, complexity, and density of the Proposed Project and its anticipated maximum attendee population (and other large-scale venues in the vicinity of the Project Site). Thus, a natural disaster or a special event impacting the Project area has the potential to result in a substantial demand for LAPD services and the services of other agencies.

A large-scale emergency response to an incident at the Project Site could involve multiple agencies throughout the City and County of Los Angeles. The LAPD has indicated that the Proposed Project is unique and requires site specific emergency planning and training. The standard utilized by most public safety agencies for handling unified response and command at emergencies and large-scale incidents is the Incident Command System (ICS). The ICS is the model tool for command, control, and coordination of emergency response and provides a means to coordinate the efforts of individual agencies as they

work toward the common goal of stabilizing the incident and protecting life, property, and the environment.

All LAPD personnel are required to complete some level of ICS training, based on the rank, position and assignment. Yearly tabletop exercises, emergency preparedness drills, and Emergency Operations Center's Level 3 activation training sessions do occur. However, the training and evaluation process has been yearly and rarely subject to a full-scale (actual movement and deployment of personnel and equipment) exercise in preparation for an emergency response to a location similar to the Project Site.

LAPD indicates that as with any large venue, the Project Site could be considered and used as a mass care and sheltering location. If the Proposed Project, upon completion, was to be considered for that use, it would have to undergo an inspection and readiness assessment to determine capabilities and compliance with AFN mandates for the physically disabled , and other mandates.

As discussed in the project design features above, to address large-scale emergencies requiring emergency response, as part of the Proposed Project, ongoing training programs would be developed with a specific focus on the California Large Stadium Initiative (CA-LSI), emergency response, evacuation, hazardous devices, persons with AFN, and active natural disaster and special event response. The CSP would include bi-yearly CA-LSI hazard training, specific training for LAPD personnel responding to the Project Site, and specific planning for AFN populations. With implementation of the CSP and associated project design features, potential police protection impacts associated with natural disasters and large-scale special events would be less than significant.

(g) Other Considerations

Increased vehicular traffic generated by the Project would result in significant impacts at a number of intersections, freeway ramps and segments of mainline freeways in the Downtown area, on the peak Event days or nights, including weekday and weekend events. During these periods of heightened traffic levels, response times to the Project Site and immediately adjacent locations could be significantly impaired as emergency vehicles find it more difficult to move through the heavy traffic. However, the drivers of emergency vehicles are highly experienced in navigating through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, the Proposed Project's Transportation Management Plan would include features to facilitate emergency vehicle access/egress. Refer to Section IV.B.1., Transportation, of this Draft EIR, for a complete description of the proposed Transportation Management Plan. With implementation of the above measures, temporary traffic impacts would result in a less than significant impact on emergency vehicle access to the Project Site and other parts of Downtown Los Angeles.

The Proposed Project would generate revenues to the City's General Fund that could be applied toward the provision of new police facilities, with related staffing. General fund revenues would be generated via a number of taxing sources that would be levied against on-site development (i.e., property tax, sales tax, business activity taxes, etc.) as well as off-site development anticipated to be developed in response to the Proposed Project (i.e., transient occupancy tax, sales tax, etc.). An analysis of the fiscal impacts of the Proposed Project to the City of Los Angeles is provided in a report titled "AEG Special Event Center Market Impacts", which is presented as Appendix H to this Draft EIR. This analysis concludes that the Proposed Project, from both on-site and off-site sources, would generate revenues to the City of Los Angeles amounting to \$27.3 million on an annually recurring basis, a portion of which may be used to fund police resources as deemed appropriate by the Los Angeles City Council.

e. Cumulative Impacts

(1) Construction

Projects with construction underway during the same timeframe as the Proposed Project may result in an increased need for security measures to prevent theft and vandalism of construction materials, supplies, equipment, and vehicles at all active construction sites. As discussed above, both Applicants would implement private security measures, including security fencing, lighting, locked entry, and security patrol on the site. Similar measures would also be expected to be imposed on these projects during the normal building permit process and would be implemented as part of the construction of the related projects. Thus, cumulative impacts associated with the provision of police protection services during construction would be less than significant.

As with the Proposed Project, related projects also have the potential to result in construction activities that could have negative impacts on traffic. However, like the Proposed Project, it is expected that the related projects would also implement transportation management plans that would include traffic management personnel (flag persons) and provisions for truck queuing, equipment staging, and construction worker parking. Furthermore, adequate emergency access along roadways adjacent to the related projects would be provided throughout the construction process, consistent with LAPD and LAFD requirements. In addition, every related project would be reviewed by LAPD as part of the normal building permit process, and appropriate measures would be identified to address potential impacts on LAPD resources. Thus, the combined cumulative impacts on police protection associated with the Project's incremental effect and the effects of the related projects during construction would be less than significant.

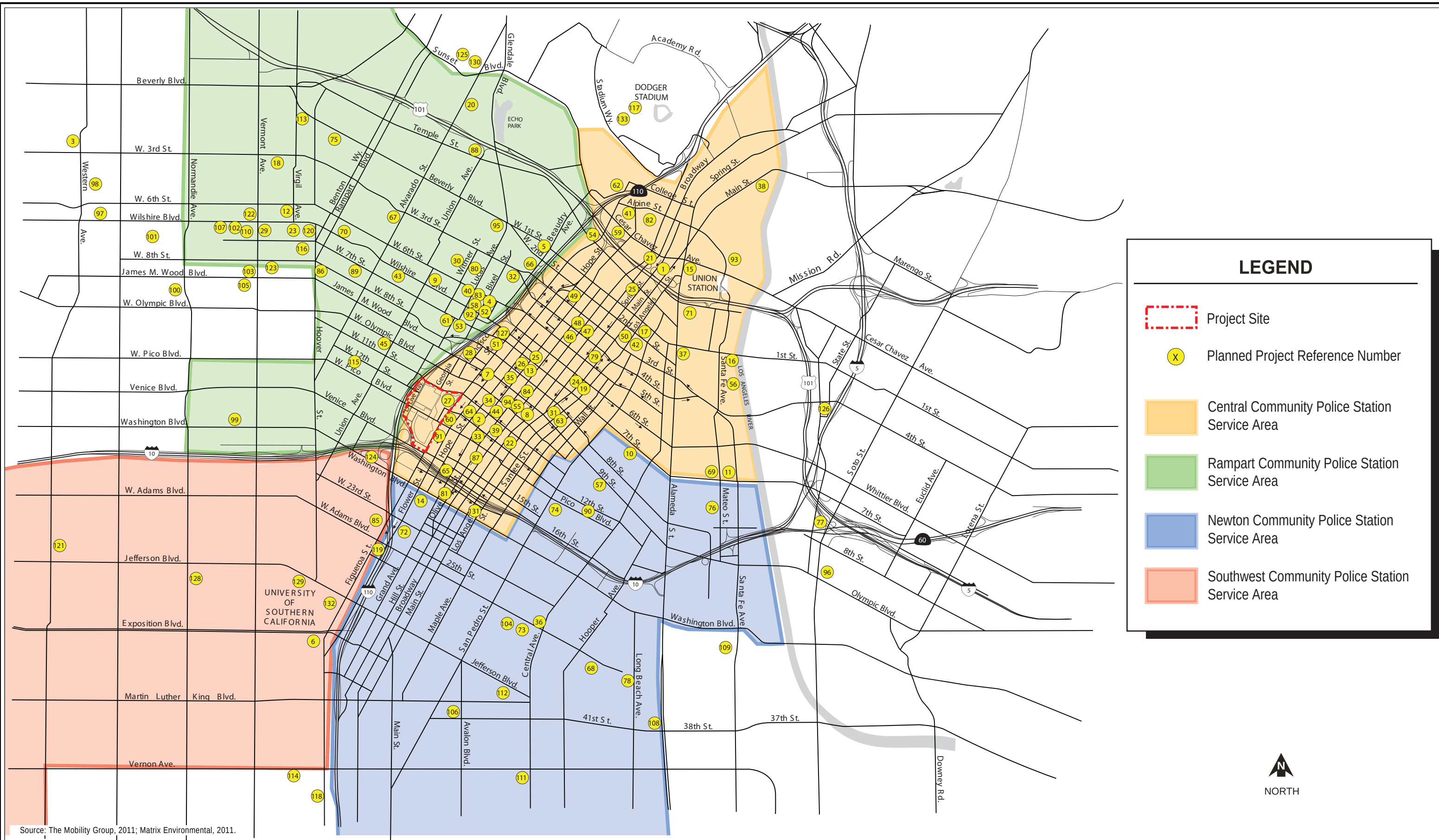
(2) Long-Term Operations

Numerous related projects are located within the service area of the Central, Rampart, Southwest, and Newton Police Stations.

Figure IV.J.1-2 on page IV.J.1-26 identifies the location of each of these related projects, whereas the proposed development totals for these projects are provided in Table IV.J.1-5 on page IV.J.1-27. These projects would be completed at various times over the next several years, and, as this additional development occurs, both daytime and night time populations within the Project area would increase. Specifically, based on the residential populations shown in Table IV.J.1-5, the related projects are estimated to generate a residential population of approximately 57,563 persons. Although the related projects list includes this level of residential development, it is not anticipated that this amount of residential development would actually occur as it would represent a doubling of the Downtown residential population in less than the next five years. While it is difficult to predict the exact impact that these related projects could have on LAPD resources, it is reasonable to conclude that additional staffing, facilities, equipment and vehicles may be needed to maintain the City's desired level of service for the police department. Thus, cumulative impacts on police protection have the potential to be significant.

Some of the increased demand for police protection services associated with the related projects would be met through security features designed into future projects. The LAPD would also continue to evaluate the need for its services on a regular basis, including the review of individual development projects as they are in the City permitting process to identify project-level measures relative to impacts on LAPD resources. LAPD would also continue to make adjustments in capital investment and staffing resources, based on an on-going analysis of crime data, population density, and other variables that could change over time. In addition, similar to the Proposed Project, the identified related projects would generate revenues to the City that could be applied to the provision of police facilities and/or related staffing. Based on the above, while the cumulative impacts of the related projects on police protection may remain significant, the Proposed Project's contribution to these impacts, taking into account the Proposed Project's design features and mitigation measures, would not be cumulatively considerable.

Emergency access impacts during operations would be reduced to less than significant levels during design review of each of the related projects which occurs during the normal building permit process. Impacts with regard to emergency response times are affected by traffic levels. While traffic levels would increase during operations of the related projects, each related project would be required to implement all feasible transportation mitigation measures which would reduce impacts to emergency response times to some degree. Further, the drivers of emergency vehicles are highly experienced in navigating



**Table IV.J.1-5
Related Project Totals within Police Station Service Areas**

Projected New Land Uses	Quantities of New Development
Residential Condominiums	14,061 dwelling units (approx. 30,583 residents) ^a
Apartments	8,757 dwelling units (approx. 19,046 residents) ^a
Affordable Housing	973 dwelling units (approx. 2,116 residents) ^a
Retail	2,283,930 sf
General Office	13,559,314 sf
Medical	130,485 sf
Restaurant	1,143,605 sf
Hotel	4,308 rooms
Schools	7,220 students (all levels)
Museum	230,270 sf
Industrial	1,145,466 sf
MTA Bus Maintenance and Inspection Facility	271 buses 647 employees
City Jail	179,000 sf
Assembly Hall	142,100 sf (350 seats)
USC Master Plan	2,500,000 sf academic 202,000 sf retail 45,000 sf restaurant 40,000 sf grocery 43,000 sf theatre 20,000 sf fitness center 5,400 student beds 250 faculty units (approx. 418 residents) ^b 165,000 sf hotel/conference 80,000 sf lab school
USC Athletic Building	91,130 sf
^a Residential population based on an average household size of 2.175 persons for all unit types within the Central City Community Plan area. ^b Residential population obtained from the USC Development Plan Draft EIR, May 2010. <i>Source: The Mobility Group, LADOT, July 2011 and Matrix Environmental, September, 2011.</i>	

through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. The combination of these factors results in less than significant cumulative impacts with regard to emergency response times.

4. Project Design Features and Mitigation Measures

a. Project Design Features

Provided below are those project design features that shall be implemented to address Project impacts on police services and facilities. In addition to the project design features listed below, the Applicants shall prepare, and implement, a Construction Management Plan, which would outline measures to ensure emergency vehicle access during all aspects of Project construction, including, but not limited to, the use of flaggers during partial street closures on streets surrounding the Project Site to facilitate traffic flow until construction is complete. In addition, the Applicants shall also implement a Transportation Management Plan that addresses pedestrians and traffic flows, pedestrian flows, and pedestrian safety, including crowd management. Please refer to Section IV.B.1, Transportation, of this Draft EIR for additional information regarding the Project's Construction Management Plan and the Project's Transportation Management Plan,

Project Design Feature J.1-1: Comprehensive Security Plan. The Applicants, in conjunction with the LAPD, shall finalize the preliminary Comprehensive Security Plan (CSP) through further consultation with the California Department of Transportation (Caltrans), Los Angeles Fire Department (LAFD), California Highway Patrol (CHP), Los Angeles County Sheriff's Department (LASD), and Metropolitan Transit Authority (Metro) as the Proposed Project proceeds through its final design phases and prior to operation. The Applicants shall implement the final CSP during operation of the Proposed Project.

The Comprehensive Security Plan shall include provisions for closure of streets and other security measures as may be appropriate for protection of Pico Passage depending on the size and nature of events. Further, in the course of finalizing the Comprehensive Security Plan and the design of the New Hall over Pico Blvd, the Applicant shall engage a qualified consultant to evaluate security risks, and in particular how to address the potential for blast related events both in design and operations, and make recommendations that may be appropriate based on the provisions of the Comprehensive Security Plan. The Applicant shall submit the consultant's report and recommendations to, and consult with LADBS, LACC, LAPD, the New Hall design team and BOE, regarding appropriate operational and design measures in consideration of the report and recommendations.

Project Design Feature J.1-2: Security Features during Construction. During construction of the Proposed Project, both Applicants shall implement private security measures including security fencing, lighting, locked entry, and security patrol on the Project Site.

b. Mitigation Measure

Mitigation Measure J.1-1: The Los Angeles Police Department (LAPD) and the Event Center Applicant shall agree to a Memorandum of Agreement (MOA) prior to the opening of the Event Center. This MOA shall ensure appropriate public safety and security deployment by the Applicant's layered security resources (plain-clothed and uniform security officers) such that there would not be an impact on service levels provided by the LAPD, including response times or other delays in service.

The MOA shall ensure scaled levels of police and security staffing based upon identified, objective standards, including, but not limited to: anticipated crowd size, historical data associated with crowd or fan behavior, event type, etc.

The MOA should include provisions for:

- Standard supervision/management-to-officer ratios;
- A minimum of one full-time Police Manager (Police Captain);
- A minimum of two support staff members; and
- Applicant's use of uniformed, off-duty LAPD officers and the LAPD deployment of on-duty uniformed resources.

In addition, the MOA shall:

- Identify the secure staging location, within the Project Site, for first responders (such as Bomb Squad, Hazmat, and other appropriate LAPD units); and
- Identify a mutually agreed upon dedicated location for explosives detection equipment storage and additional first responder equipment.

The MOA shall ensure that any measures to mitigate or avoid significant adverse changes are fully enforceable. Full implementation of the MOA's stipulations shall also be required.

5. Level of Significance After Mitigation

Project impacts would be less than significant and no mitigation measures beyond that set forth above and Mitigation Measures B.1-9 and B.1-29 in Section IV.B.1, Transportation, of this Draft EIR would be required.