

IV. Environmental Impact Analysis

K.1 Public Services—Police Protection

1. Introduction

This section of the Draft EIR analyzes the change in demand for police protection services associated with implementation of the proposed Project. The focus of the analysis is the City of Pasadena Police Department (PPD) facilities that currently serve the Project Site and the ability of the PPD to provide adequate police protection services to the Project. The analysis is based in part on information provided by the PPD, which is included in Appendix I of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are no relevant local plans, regulations, or programs related to police protection services in the City of Pasadena.

b. Existing Conditions

(1) Overview of Existing PPD Services

The City of Pasadena (City) is served by one main police station located at 207 North Garfield Avenue. This station is located approximately 0.4 mile east of the Project Site. The police station is approximately 86,000 square feet in size, with over 500 full-time employees, part-time employees, and volunteers. In addition to this station, the PPD operates a facility located at 2175 Yucca Lane in Altadena which provides air service related operations for Pasadena and other San Gabriel Valley police agencies. The PPD currently does not have plans to expand their police facilities.¹

¹ John E. Perez, Commander, Memorandum—City of Pasadena Police Department, Response to Matrix Environmental/Parsons' Project, Memo to Jason Mikaelian, Senior Planner, City of Pasadena. February 6, 2014.

The Pasadena Police Department is a full-service public safety organization that provides a variety of services such as: patrol; investigative; community outreach services; special weapons and tactics (SWAT); narcotics; and neighborhood policing resources. In addition, the PPD also provides: air services (helicopter); regional anti-crime units; K9 officers; counter-terrorism units; and mental health and homeless outreach services. The PPD also provides emergency dispatching, jail housing, forensic science, and community related services to include public records, fingerprinting, crime analysis capabilities, and an array of educational and youth based programs. As of February 6, 2014, departmental staffing resources within the PPD included 368 employees, with 239 sworn-officers. Over 100 police officers, corporals, and sergeants are assigned to the patrol operations and additional 30 personnel comprised of neighborhood policing and traffic enforcement officers are deployed for policing services and critical events. Based on the City's population of 140,000,² the PPD currently has an officer to population ratio of 1.7 officers for every 1,000 residents.

The PPD utilizes a six level priority Calls for Service system with the highest type of emergency calls classified as a priority one, in-progress crime calls where there is a high concern for personnel safety to include critical missing persons. Priority two calls for service include events where there is a highly likelihood of apprehending a suspect. Priority three calls are active incidents most commonly related to public nuisances and disturbances, while priority four calls for service are those that require a report by a police officer of an event that has already occurred. Priority four calls include calls for service that permit police civilian employees to respond and intake a police report for events such as burglary, traffic collisions, and abandoned personal property. Priority six calls for service are reports required for documentation such as delayed property crime reports, custodial reports generated from the jail facility, and investigative reports generated by detective personnel. Citywide, approximately 4,000 calls for service per month range in the priority 1-3 matrix of responses which may require at least two police officers (and possibly additional officers and resources) to respond to ensure safety levels and assist with the investigation and management of calls for service. Currently, the PPD maintains an average emergency response time of between 4 minutes and 58 seconds and 5 minutes and 37 seconds.³ Emergency responses include calls for service that require immediate and emergency response (lights and sirens) to other type of calls for service that do not require the use of lights and sirens for an emergency response (increasing response time).

² U.S. Census Bureau, *American Fact Finder, Population and Housing Occupancy Status: 2010*, <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>, accessed March 10, 2014.

³ John E. Perez, Commander, *Memorandum—City of Pasadena Police Department, Response to Matrix Environmental/Parsons' Project, Memo to Jason Mikaelian, Senior Planner, City of Pasadena. February 6, 2014.*

The Pasadena Police Department utilizes a Community Services Area Policing model. This model allows for the decentralization of police services, enhancing community/businesses partnerships, and improving the quality of life for all people. The PPD divides the City into five Community Service Areas: West, Northwest, Central, East, and Midtown. Each Community Service Area is commanded by a police lieutenant. The Project Site is located within the Midtown Community Service Area. In 2013, calls for service for the West and Midtown service areas totaled approximately 41,000 incidents related to police services generated from citizen requests or self-initiated activity by police officers. In 2013, a total of 438 crime incidents occurred in the Project vicinity. These incidents were classified into 19 categories as shown in Figure IV.K.1-1, Crime Statistics in the Project Vicinity, on page IV.K.1-4. According to the PPD, as many as 15 officers are deployed within the area surrounding the proposed Project during high activity, and as low as two to four police officers during inactive periods. Deployment methodologies are based on calls for service levels, special event staffing, and level of night-life activity.

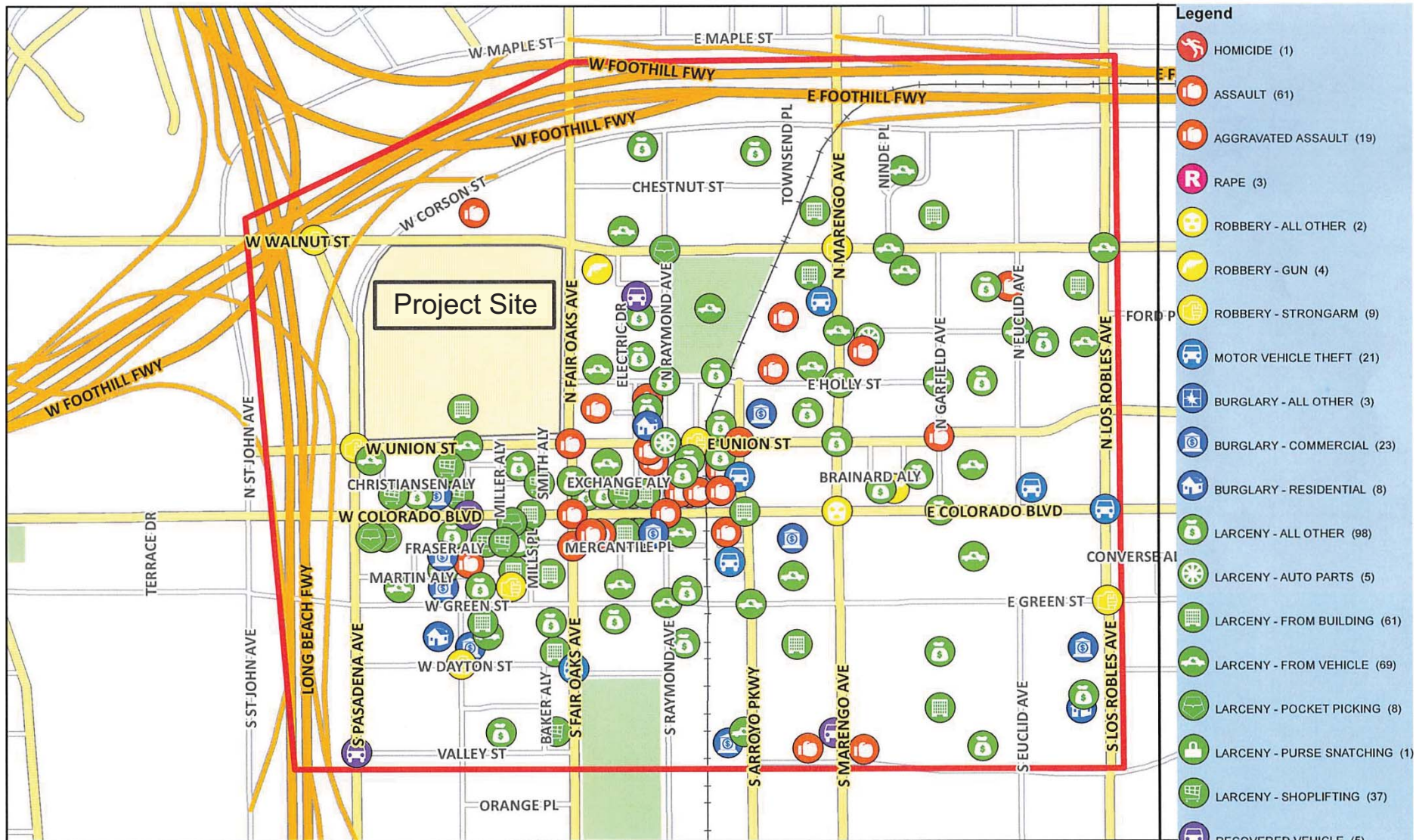
3. Project Impacts

a. Methodology

Impacts on police protection services are considered significant if an increase in population or development levels as a result of the proposed Project would result in inadequate staffing levels, increased response times, and/or increased demand for services that would require the construction or expansion of new or altered facilities that themselves could have an adverse physical effect on the environment. Thus, a significant impact would occur if the police station serving the Project area could not meet proposed Project demand, or require the construction of new or expanded police facilities that would cause significant environmental impacts. The methodology used to evaluate potential police protection service impacts includes the following: (1) evaluation of existing police services for the police station(s) serving the Project Site; (2) determination whether the existing police services and personnel are capable of servicing the proposed Project; and (3) determining whether the Project's contribution to the future service population would cause the police station(s) to operate beyond its service capacity.

b. Thresholds of Significance

The proposed Project may have a significant impact on police protection services if it would:



NOTE: The Pasadena Police Department has indicated that they are not responsible for the misinterpretation of this map and makes no inference or judgment as to the relative safety of particular areas. The Pasadena Police Department has further indicated that the INFORMATION IS TIME SENSITIVE AND SUBJECT TO CHANGE UPON FURTHER ANALYSIS.



Figure IV.K.1-1
Crime Statistics in the Project Vicinity

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

c. Regulatory Compliance Measures and Project Design Features

(1) Regulatory Compliance Measures

No Regulatory Compliance Measures are in place with regard to police protection services.

(2) Project Design Features

The following Project Design Features are proposed with regard to police protection services:

Project Design Feature K.1-1: During construction, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry.

Project Design Feature K.1-2: During construction and operation, the Project would provide private on-site security, a closed circuit security camera system, and, during operation, a keycard entry for residential parking areas.

d. Analysis of Project Impacts

(1) Construction

Construction sites, when not properly secured, have the ability to be a potential source of nuisance and hazards and can contribute to a temporary increase in criminal activities such as theft and vandalism, which could increase the demand for PPD services. Pursuant to Project Design Feature H.1-1, the Applicant would implement temporary security measures during construction, including security fencing, lighting, and locked entry to secure the Project Site during Phase 1 and Phase 2 construction. Additionally, Project Design Feature H.1-2 would enhance safety and decrease the opportunity for crime by providing on-site security and a closed-circuit security camera system. Potential impacts associated with theft and vandalism during construction activities would be considered less

than significant with incorporation of these features in conjunction with the implementation of Mitigation Measure H.1-2, which requires the Applicant to coordinate with the PPD prior to and during Project construction to ensure that adequate security measures are in place.

Construction activities also have the potential to affect police response times due to the construction of the proposed Project. As discussed in the Project Description, the on-site portions of Holly Street and Leonard J. Pieroni Street would be temporarily closed during construction for reconstruction which would take approximately six (6) months to complete. The potential limited availability of these two streets for police vehicle access during this time period could impact the delivery of police protection services to the Project Site. In addition to these street closures, construction activities would also generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. Both the closures and construction traffic have the potential to affect police response times due to travel time delays caused by traffic on the roadways surrounding the Project. Implementation of Mitigation Measure H.1-1 would minimize these impacts by requiring the Project's construction management plan to include provisions regarding the maintenance of police vehicle access to all areas of the Project Site during the time when Holly Street and Leonard J. Pieroni Street are being reconstructed. Moreover, lane closures and construction-related traffic are unlikely to greatly affect police response times since PPD officers normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, flagmen would be used to facilitate the traffic flow until the construction is complete, should any lane closures to the streets surrounding the Project occur.

Phase 1 and Phase 2 construction activities have the potential to affect police response times due to increased traffic congestion and possible lane closures during Project construction; however, implementation of the project design features and Mitigation Measures H.1-1 and H.1-2 would reduce potential impacts to police response times. Therefore, the proposed Project would not exceed the capability of the PPD to serve the Project Site or vicinity and impacts on police protection services during both Phase 1 and Phase 2 Project construction would be less than significant.

(2) Operation

Impacts on police protection services are considered significant if an increase in population or development levels would result in inadequate staffing levels (as measured by the ability of the PPD to respond to calls for service) and/or increased demand for services that would require the construction or expansion of new or altered facilities, the construction of which would cause an adverse physical effect on the environment. The proposed Project would consist of 475 residential dwelling units, which would result in a net

increase of approximately 969 residents. As described above, the City's current service population is approximately 140,000 persons and the PPD has an existing officer to population ratio of 1.7 officers for every 1,000 residents. The addition of 969 residents to the City would cause the ratio to incrementally decrease to approximately 1.69 officers for every 1,000 residents. This would result in a change in officer per resident ratio of less than 1 percent, which would not be a significant change. Furthermore, the PPD has determined that there are no aspects of the Project (e.g., subterranean parking structure) that would cause a higher degree of calls for service, crowd management issues, or special event dynamics than what would normally be associated with the amount of development included within the proposed Project.⁴

In addition to an increase in the residential population, the proposed Project would attract employees and visitors associated with the proposed 620,000 square feet of office space and 10,000 square feet of restaurant space. Increased employment and visitors could lead to an increase in demand for police services at the Project Site. However, the increase in employment and visitor growth would not result in a sufficient increase in demand for police services which would warrant the need for new or expanded police facilities. Therefore, the proposed Project would not require additional police personnel beyond what the PPD currently employs.

As stated above, approximately 438 crimes were reported in the area surrounding the Project Site in 2013. Given the increase in human activity on the Project Site, the potential for crime on and around the Project Site may also increase. Crimes that could potentially be committed on the Project Site include crimes that are typically associated with similar commercial and residential land uses in the area. As shown in Figure IV.K.1-1, on page IV.K.1-4, other larceny, larceny of buildings, and larceny of vehicles are the most common crimes in the area surrounding the Project Site. Although, the PPD has stated that the proposed Project would have a less than significant impact on police services in this area, it recommends that the PPD provide input on crime prevention features appropriate for the proposed Project.⁵ As such, implementation of Mitigation Measure H.1-2, which requires ongoing coordination with the PPD, would reduce the potential for crimes to occur at the Project Site.

⁴ John E. Perez, Commander, Memorandum—City of Pasadena Police Department, Response to Matrix Environmental/Parsons' Project, Memo to Jason Mikaelian, Senior Planner, City of Pasadena. February 6, 2014.

⁵ John E. Perez, Commander, Memorandum—City of Pasadena Police Department, Response to Matrix Environmental/Parsons' Project, Memo to Jason Mikaelian, Senior Planner, City of Pasadena. February 6, 2014.

The PPD has indicated that it would be challenging to establish a community strategy to provide additional policing services to ensure safety and security partly as a result of the potential for increased opportunities for property crime with the addition of 4,000 subterranean parking stalls, 475 residential units, and an increased number of business units with computers and other valuable business equipment. To address this circumstance, Project Design Feature H.1-2, would result in the Project incorporating security features such as private on-site security, a closed circuit security camera system, and keycard entry for residential parking areas within the proposed parking structure. The Project would also include appropriate lighting to ensure security and prevent concealed spaces. Thus, the Project's design features would help offset the increase in demand for police services. In addition, the PPD has indicated that the location of the Project's traffic ingress and egress points is vital to the traffic flow in the immediate area which is expected to increase at peak times of the day and night. To further address potential impacts, implementation of Mitigation Measure H.1-2, which requires the Applicant to coordinate with the PPD prior to and during Project construction and operation to ensure that adequate security measures are in place and submit site circulation plans for PPD review, would further reduce the potential for crimes to occur at the Project Site. The PPD has concluded that their participation in the manner prescribed by Mitigation Measure H.1-2 would provide proactive strategies as opposed to reactive responses to crime and the quality of life challenges that can develop after a project of this magnitude is completed. The recommended approach would also reduce the potential for increased crime activity and public nuisances.

In summary, operation of the proposed Project would not substantially increase the demand for police protection services such that there would be a need to alter or construct new police facilities to maintain existing service ratios. Therefore, the proposed Project would result in a less than significant impact with mitigation related to police protection services. Because impacts to the PPD are based on the amount and type of development occurring at a project site and impacts at Project buildout are less than significant, Project impacts following the completion of Phase 1 of the Project would also be less than significant.

4. Cumulative Impacts

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Based on the information presented in Section II, Environmental Setting, of this Draft EIR, there are 31 related projects within the Midtown Community Service Area and 55 related projects located within the entire City of Pasadena. These projects fall within the service boundary of the PPD

and are estimated to result in an increase of approximately 2,300 residential units; approximately 500,000 square feet of various types of office, retail, restaurant, and medical facilities; and approximately 1,200 hotel rooms.

Given this amount of cumulative growth, the PPD is concerned about impacts to PPD services commonly associated with urban development, such as increases in traffic congestion, pedestrian and bicycle traffic, property crime, issues associated with the homeless, and personal safety issues. The PPD has also indicated that increased population density creates additional concerns related to quality of life challenges such as homeless associated issues, property crime, and a need for higher levels of personal safety awareness related to expanded tourism, shopping, nightlife, and business activity. While cumulative development would increase calls for service and crime throughout the City, each project would be subject to further review by the PPD. Thus, the City and the PPD would be able to monitor population growth and land development throughout the City to identify additional resource needs such as additional, employees, vehicle, equipment, and technology needs. Consequently, cumulative development would not result in adverse physical impacts related to the construction of police facilities, and cumulative impacts would be less than significant.⁶

5. Mitigation Measures

The following Mitigation Measures are required to reduce impacts associated with Project construction and operations.

Mitigation Measure K.1-1: The Applicant shall include provisions in the Project's construction management plan that addresses emergency vehicle access to the Project Site, particularly during the period of time that the on-site segments of Holly Street and Leonard J. Pieroni Street are under construction. This portion of the Project's construction management plan shall be subject to the review and approval of the PPD. The construction management plan may include the following measures:

- Dedicated compliance from the construction company with the project's construction hours with 24-hour contact phone numbers for PPD and other city departments;

⁶ John E. Perez, Commander, Memorandum—City of Pasadena Police Department, Response to Matrix Environmental/Parsons' Project, Memo to Jason Mikaelian, Senior Planner, City of Pasadena. February 6, 2014.

- Development of an incident management program so that the construction company can keep the city aware of issues;
- Develop investigative process for all theft losses which includes police reporting procedures and steps taken prior to reporting;
- Ensure a security walk-thru with the city prior to the start of Project construction;
- An agreement between the city and the construction company regarding agreed upon security measures;
- Monitoring compliance through regular meetings with the construction company and the City;
- Commitment to establish a traffic mitigation plan with the City to include street closures, acceptable levels of traffic flow through the construction area, & minimize traffic delays;
- Use of the appropriate number of construction employees for road closures and temporary traffic stops
- Development of alternate traffic routes; and
- A commitment to install temporary or portable lighting in specific areas to reduce break-in, thefts, and other criminal activity.

Mitigation Measure K.1-2: The Applicant shall consult with the PPD prior to and during Project construction and operation to ensure that adequate security measures are incorporated into Phase 1 and Phase 2 of the Project. During this consultation, the Applicant will be required to submit site circulation plans for PPD review. Security measures incorporated into the Project may include the following:

- On site uniformed security that is visible during critical times such as during the night hours;
- The posting and use of surveillance cameras at strategic points and in areas with higher risk of break-ins;
- Use of lighting for darkened areas and other sections storing inventory;
- Use of local security companies familiar with Pasadena;
- Trespass letters on file with the PPD to help expedite trespass arrests when needed;
- Limiting the number of hardwired appliances to reduce theft;
- Signage posting of warnings, hazards, and trespassing;

- Identifiable and easily seen markings on equipment (reduce thefts);
- Reduce access to equipment storage areas to designated workers; and
- Tools and store depots should be permanently staffed during the day to reduce opportunity for thefts.

6. Level of Significance

With the implementation of the identified project design features and mitigation measures, Project-level and cumulative impacts to PPD services, during construction and operations of Phase 1, Phase 2 and Project Buildout would be less than significant.