

IV. Environmental Impact Analysis

I.2 Public Services—Police Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing police protection services in the vicinity of the Project Site. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) August 17, 2020, and statistical data regarding police protection facilities and services and response times. This information is included in Appendix N of this Draft Environmental Impact Report (EIR). Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding police protection at the state, regional, and local levels. Described below, these include:

- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management
- City of Los Angeles General Plan, including
 - Framework Element
 - Community Plan
- City of Los Angeles Charter

- Administrative and Municipal Codes
- LAPD COMPSTAT Program
- LAPD Guidelines and Plan Review

(1) State

(a) *California Vehicle Code, Section 21806*

California Vehicle Code (CVC) Section 21806 pertains to emergency vehicles responding to Code 3 incidents/calls.¹ This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety.... (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(b) *California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well as

¹ *A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.*

other public safety services. Section 35 at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided. Furthermore, as the court concluded, the need for additional public safety services is not an environmental impact that CEQA requires a project to mitigate.²

(c) California Penal Code

All law enforcement agencies in California are organized and operated 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) Regional

(a) County of Los Angeles Office of Emergency Management

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County’s Emergency Management Organization. The OEM’s broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.³

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to LAPD using only its own available resources.

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

³ *County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management*, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed February 9, 2022.

(3) Local

(a) *Los Angeles General Plan*

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the City and guides subsequent amendments of the City's Community Plans Specific Plans, zoning ordinances, and other local planning programs.

Chapter 9 of the Framework Element addresses Infrastructure and Public Services. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard. The relevant General Plan police protection goals, objectives, and policies are included in Table IV.1.2-1 on page IV.1.2-5.

(ii) *Hollywood Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project is located within the Hollywood Community Plan (Community Plan) area. The Community Plan,

Table IV.1.2-1
Relevant General Plan Police Protection Goals, Objectives, and Policies—Framework Element:
Chapter 9, Infrastructure and Public Services

Goal 9I	Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.
<hr/> <p><i>Source: City of Los Angeles, 2001.</i></p>	

adopted on December 13, 1988, does not include any objectives or policies that specifically relate to police protection.

(b) City of Los Angeles Charter

Section 570 of the City Charter gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

(c) Administrative and Municipal Codes

Section 22.240 of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code for the training of police dispatchers. Los Angeles Municipal Code (LAMC) Chapter 5 includes regulations, enforceable by the police, related to firearms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's

Fire, Building, and Health Codes. The LAPD is also given the power and the duty to protect residents and property, and to review and enforce specific security-related mitigation measures with regard to new development.

(d) LAPD COMPSTAT Program

The LAPD COMPSTAT was created in 1994 and implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.⁴

(e) LAPD Guidelines and Review

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD's Design Out Crime Guidelines, which incorporates techniques of Crime Prevention Through Environmental Design (CPTED) and seeks to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems;
 - Controlling and monitoring activities in parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;

⁴ LAPD, COMPSTAT, www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed January 25, 2021.

- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

b. Existing Conditions

(1) LAPD Service Area and Bureaus

The LAPD service area covers approximately 468 square miles and is divided into four geographic bureaus: the Central Bureau; the West Bureau; the South Bureau; and the Valley Bureau.⁵ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD’s 21 community police stations.⁶ Each geographic bureau is comprised of four to seven geographic areas/police stations.⁷

As of, December 2021 the departmental staffing resources within the LAPD included 9,521 sworn officers. Based on a total City population of 4,015,546, the LAPD currently has an officer-to-resident ratio of 2.4 officers for every 1,000 residents.^{8,9}

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.¹⁰ The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, and West Los Angeles service areas.¹¹ The West Bureau also oversees the West Traffic Division, which

⁵ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed November 11, 2021.

⁶ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed November 11, 2021.

⁷ LAPD, *LAPD Organization Chart*, www.lapdonline.org/contact_us/content_basic_view/1063, accessed September 16, 2020.

⁸ LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 11/28/21 to 12/25/21*.

⁹ $9,521 \text{ officers} \div 4,015,546 \text{ residents} = 0.0024 \text{ officer per resident} = 2.4 \text{ officers per } 1,000 \text{ residents}$.

¹⁰ LAPD, *West Bureau*, www.lapdonline.org/lapd-contact/west-bureau/, accessed November 11, 2021.

¹¹ LAPD, *West Bureau*, www.lapdonline.org/lapd-contact/west-bureau/, accessed November 11, 2021.

includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.¹²

(2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within the Hollywood Division and is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.3 mile southwest of the Project Site.¹³ The location of the police station that serves the Project Site is depicted in Figure IV.1.2-1 on page IV.1.2-9. The Hollywood Division is approximately 13.34 square miles and is generally bounded by Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north, and Beverly Boulevard on the south.¹⁴ This station serves a residential population of approximately over 165,000 persons and is staffed by approximately 387 sworn officers and 15 civilian support staff.¹⁵ As of August 2020, the average response time was 3.4 minutes for emergency high priority calls, 12.5 minutes for medium high priority calls, and 33.6 minutes for low priority non-emergency calls in the Hollywood Division.¹⁶ Based on the police service population of approximately 165,000 persons, the officer-to-resident ratio is approximately 2.3 officers per 1,000 residents.¹⁷ As described above, the officer-to-resident ratio citywide is 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.1.2-2 on page IV.1.2-10 shows a comparison of the Hollywood Division and Citywide data regarding Part I crimes as reported by the LAPD based on only residential populations.¹⁸ As shown therein, based on data available from 2021, approximately 6,830 crimes were reported within the Hollywood Division and 117,702 crimes were

¹² LAPD, West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed November 11, 2021.

¹³ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.

¹⁴ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.

¹⁵ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.

¹⁶ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.

¹⁷ $387 \text{ officers} \div 165,000 \text{ residents} = 0.0023 \text{ officer per resident} = 2.3 \text{ officers per } 1,000 \text{ residents}$.

¹⁸ Part I crimes include criminal homicide, forcible rape/legacy rape, revised rape, robbery, aggravated assault, burglary (breaking or entering), larceny-theft, motor vehicle theft, and arson, based on U.S. Department of Justice Federal Bureau of Investigation, Uniform Crime Reporting (UCR) Offense Definitions, <https://ucr.fbi.gov/crime-in-the-u.s/2011/crime-in-the-u.s.-2011/offense-definitions>, accessed February 9, 2022.

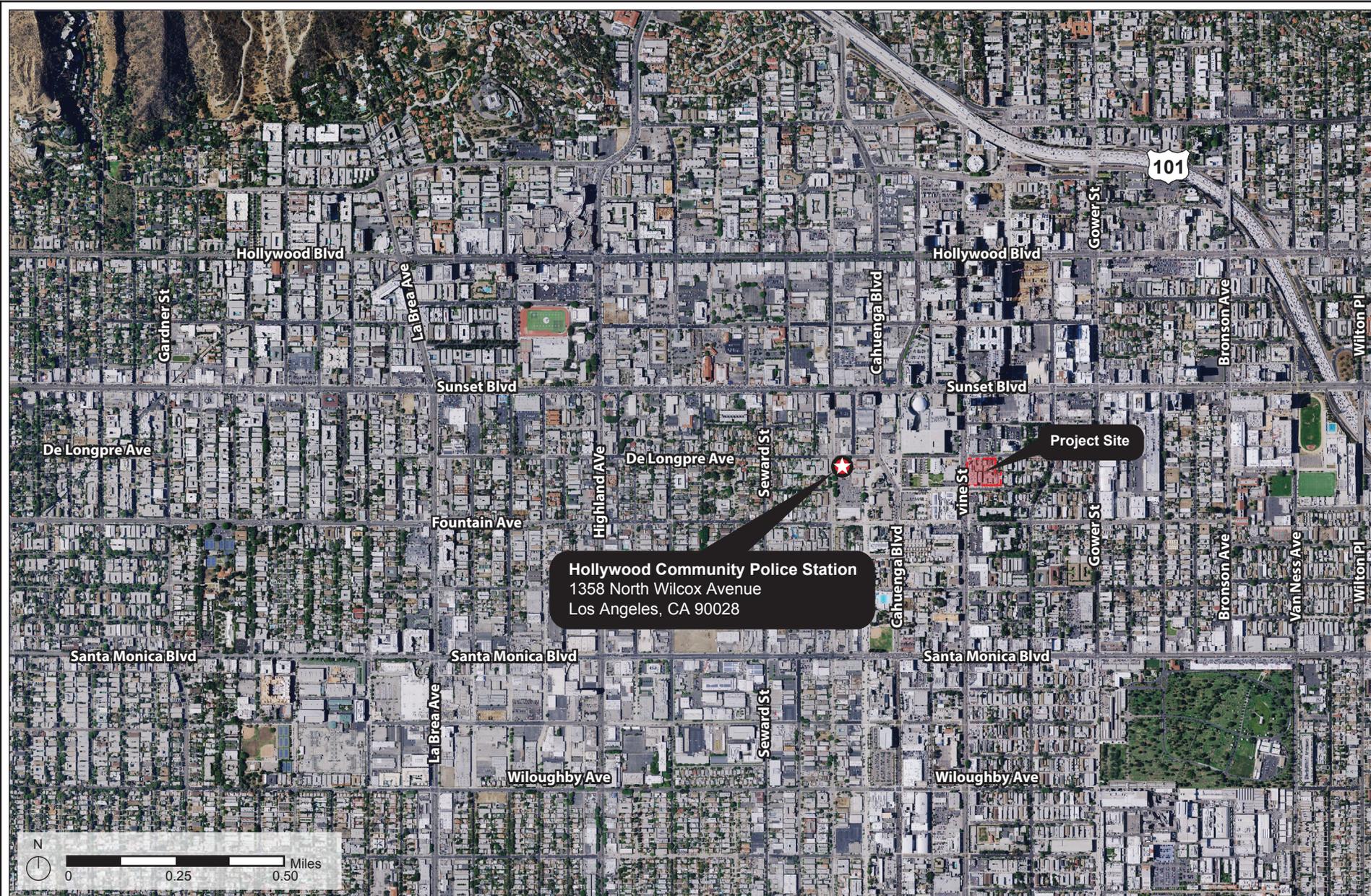


Figure IV.I.2-1
Police Station Serving the Project Site

**Table IV.1.2-2
2021 Part I Crimes—Hollywood Division and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Hollywood Division	6,830	165,000	41.4	0.0414
Citywide	117,702	4,015,546	29.3	0.0293

Source: LAPD, COMPSTAT Unit, COMPSTAT Hollywood Area Profile, 11/28/21 to 12/25/21.
LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile, 11/28/21 to 12/25/21.

reported citywide. Based on the residential service population of the Hollywood Community Police Station, approximately 41.4 crimes per 1,000 residents (0.0414 crime per capita) were reported in the Hollywood Division¹⁹ and approximately 29.3 crimes per 1,000 residents (0.0293 crime per capita) were experienced citywide.²⁰

Based on the number of sworn officers staffing the Hollywood Community Police Station (387 sworn officers), the ratio of crimes per officer is 17.6 crimes per officer in comparison to a citywide ratio of 12.4 crimes per officer (9,521 sworn officers citywide).

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to police protection if it would:

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities (i.e., police), 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.

In assessing impacts related to police protection services in this section, the City will use Appendix G as the thresholds of significance. The factors and consideration identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to

¹⁹ $6,830 \text{ crimes} \div 165,000 \text{ residents} = 0.0414 \text{ crime per resident} = 41.4 \text{ crimes per } 1,000 \text{ residents.}$

²⁰ $117,702 \text{ crimes} \div 4,015,546 \text{ residents} = 0.0293 \text{ crime per resident} = 29.3 \text{ crimes per } 1,000 \text{ residents.}$

assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate police protection:

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

b. Methodology

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical averages associated with the police station serving the Project Site and Citywide services and, based on guidance from the LAPD, focuses on the increase in the residential population from the Project. Project design features and any additional mitigation measures that would reduce the impact of the Project on police services are also described.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact.²¹ Moreover, pursuant to the *Hayward* ruling, the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.²² To the extent a project generates a demand for additional police services that results in the need to construct new facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact needs to be evaluated within the project EIR and mitigated (if feasible), if found to be significant. The ultimate determination of whether a significant impact to the environment related to police services would result from a project is determined by whether construction of new or expanded police facilities is reasonably foreseeable as a direct or indirect effect of the project.

²¹ *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal, App. 4th 833, 843, 847.

²² *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal, App. 4th 833, 843, 847.

There are no current capital improvement plans for the construction or expansion of police facilities in the Project area. In the event that the City determines that expanded or new police facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332, Negative Declaration, or Mitigated Negative Declaration.

c. Project Design Features

The following project design features are applicable to the Project:

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

Project Design Feature POL-PDF-2: The Project will include a closed circuit camera system and keycard entry for the residential building and the residential parking areas.

Project Design Feature POL-PDF-3: The Project will provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project will design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant will consult with LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project.

Project Design Feature POL-PDF-7: Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD Hollywood Division's Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development options—the Residential Option and the Office Option.

The Residential Option would develop a new high-rise building with four levels of subterranean parking consisting of up to 429 new residential units, including 36 units designated for Very Low Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units.

The Office Option would develop a new high-rise building with eight levels of subterranean parking with approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the proposed building, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units.

The following analysis accounts for both development options and the term “Project” is used to describe all development scenarios unless stated otherwise.

Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., police), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

(1) Impact Analysis

(a) Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of the existing commercial uses on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction.

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

Project construction activities could also potentially impact LAPD police protection services within the Hollywood Division due to construction impacts on the surrounding roadways. As discussed in Section IV.J, Transportation, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Although construction activities would be short-term and temporary, Project construction activities could increase response times for police vehicles along Sunset Boulevard, El Centro Avenue, and other main connectors due to travel time delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a construction traffic management plan, including a worksite traffic control plan, and a construction worker parking plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2 in Section IV.J, Transportation, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT) and may include, but are not limited to, limiting potential lane closures to the extent feasible, and scheduling deliveries and receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response times within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

Based on the above analysis, upon implementation of the PDFs and compliance with state law, construction-related impacts would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site or surrounding area. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's service capability; accordingly, the Project would not result in adverse physical impacts associated with the

construction of new or altered facilities, the construction of which would cause significant environmental impacts. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

The Project Site is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.3 mile west of the Project Site. The Hollywood Community Police Station is staffed by 387 sworn officers and a 15-person civilian support staff. As shown in Table IV.1.2-3 on page IV.1.2-16, of the two development options, the Project's Office Option with restaurant bungalows would generate the greatest daytime net police service population, 1,836 net new employees. Of the two development options, the Project's Residential Option would result in the greatest net residential service population by generating 966 permanent new residents on-site. Written correspondence from LAPD states that a project of this size could have a minor impact on police services in the Hollywood Division.²³ The Project would increase the existing LAPD residential service population in the Hollywood Division from 165,000 persons to up to 165,966 persons. However, despite the increase in police service population, the officer-to-resident ratio for the Hollywood Division would remain at its current level of approximately 2.3 officers per 1,000 residents.²⁴

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of buildings and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project would also design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6 and POL-PDF-7, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of

²³ *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.*

²⁴ $387 \text{ officers} \div 165,966 \text{ residents} = 0.0023 \text{ officer per resident} = 2.3 \text{ officers per } 1,000 \text{ residents.}$

**Table IV.1.2-3
Estimated Project Service Population for the Project Site**

Land Use	Units	Conversion Factor ^a	Total Police Service Population
Existing Occupied Uses			
Post Production ^{b,c}	21,594 sf	4 emp/ksf	86
Retail	8,044 sf	2 emp/ksf	16
<i>Subtotal Existing</i>			<i>102 employees</i>
Proposed Residential Option (restaurant bungalows)			
Residential Units	429 du	2.25 persons/du	966
Grocery Store	55,000 sf	4 emp/ksf	220
Retail	5,000 sf	2 emp/ksf	10
Restaurant (bungalows)	8,988 sf	4 emp/ksf	36
<i>Subtotal</i>			<i>1,232 total (266 employees 966 residents)</i>
Proposed Residential Option (residential bungalows)			
Residential Units (including 12 du in bungalows)	429 du	2.25 persons/du	966
Grocery Store	55,000 sf	4 emp/ksf	220
Retail	5,000 sf	2 emp/ksf	10
<i>Subtotal</i>			<i>1,196 total (230 employees 966 residents)</i>
Proposed Office Option (restaurant bungalows)			
Office	463,521 sf	4 emp/ksf	1,855
Restaurant	11,914 sf	4 emp/ksf	47
Restaurant (bungalows)	8,988 sf	4 emp/ksf	36
<i>Subtotal</i>			<i>1,938 total employees</i>
Proposed Office Option (residential bungalows)			
Office	463,521 sf	4 emp/ksf	1,855
Restaurant	11,914 sf	4 emp/ksf	47
Residential (bungalows)	9 du	2.25 persons/du	20
<i>Subtotal</i>			<i>1,922 total (1,902 employees 20 residents)</i>
Project Net Police Service Population (Residential Option with Restaurant Bungalows – Existing Occupied)			1,130 Total (164 employees 966 residents)
Project Net Police Service Population (Residential Option with Residential Bungalows – Existing Occupied)			1,094 Total (128 employees 966 residents)
Project Net Police Service Population (Office Option with Restaurant Bungalows – Existing Occupied)			1,836 Total employees
Project Net Police Service Population (Office Option with Residential Bungalows – Existing Occupied)			1,820 Total (1,800 employees 20 residents)

**Table IV.1.2-3 (Continued)
Estimated Project Service Population for the Project Site**

Land Use	Units	Conversion Factor ^a	Total Police Service Population
<p><i>du = dwelling units</i> <i>emp = employees</i> <i>kSF = thousand square feet</i> Totals may not sum due to rounding.</p> <p>^a Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. The following rates were used: 2.25 residents per multi-family dwelling unit; 4 employees per 1,000 square feet of office; 4 employees per 1,000 square feet of supermarket; 2 employees per 1,000 square feet of retail; and 4 employees per 1,000 square feet of high-turnover sit down restaurant.</p> <p>^b Comprised of the 17,100-square-foot post-production facility and the three bungalows comprised of 4,494 square feet currently used for office/post production uses.</p> <p>^c The LADOT VMT Calculator Documentation does not provide an employee generation rate for this use. The general office rate of 4 employees per 1,000 square feet was applied.</p> <p>Source: Eystone Environmental, 2022.</p>			

property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.²⁵ The Project’s design features, as well as the Project’s contribution to the General Fund, would help offset the potential Project-related increase in demand for police services. Therefore, the Project’s impact on police services would be less than significant.

Project-related traffic would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, the Project would not include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within or in the vicinity of the Project Site. In addition, in accordance with CVC Section 21806, drivers of police emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, emergency access to the Project Site and surrounding uses would be maintained at all times and Project operation would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, the Project’s impact on emergency response times would be less than significant.

Based on the above analysis, the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD’s capacity to serve the Project Site and surrounding area. In addition, written correspondence from LAPD states

²⁵ City of Los Angeles, *Proposed Budget for the Fiscal Year 2020–21*.

that there are no special police protection requirements because of the specific attributes of this Project Site, and the Project, individually or combined with other past, present or future projects, will not result in the need for new or altered facilities.²⁶ Furthermore, the Project would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project.

Therefore, the Project would not result in a need to construct any new police facilities or modify any existing facilities, the construction of which would cause significant environmental impacts.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to police protection would be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, a total of 102 related projects are located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 102 is a conservative assumption, as some of the related projects may not be built out by 2027 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 102 are fully built out by 2027, unless otherwise noted. In addition, when adopted, Related Project No. 103, the Hollywood Community Plan Update will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2027, well before the Community Plan Update's horizon year. Moreover, 2027 is a similar projected buildout year as many of the 102 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would

²⁶ *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.*

account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

Of the 102 related projects, 86 of the related projects fall within the boundaries of Hollywood Division and are served by the Hollywood Community Police Station.

(a) Construction

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

Therefore, the Project's contribution to cumulative police protection impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, would not be cumulatively considerable, and cumulative impacts would be less than significant.

(b) Operation

As shown in Table IV.1.2-4 on page IV.1.2-20, growth from the related projects that fall within the boundaries of the Hollywood Division is estimated to result in total service population of approximately 53,572 persons, including both residents (permanent population) and employees (daytime population). These are conservative estimates because they are not all net new residents and employees. In other words, these estimates do not account for the removal of existing uses and their associated existing resident and employee populations resulting from the development of the related projects.

When considering only residential service population, the related projects are estimated to generate 27,242 residents. As such, the related projects' residential

**Table IV.1.2-4
Estimated Service Population from Related Projects within Hollywood Division**

No. ^a	Project	Description	Size	Conversion Factor ^b	Estimated Service Population
1	1610 N. Highland Ave.	Apartments	248 du	2.25	558
		Commercial	12,785 sf	4 emp/ksf	51
2	1740 N. Vine St.	Residential	492 du	2.25	1,107
		Hotel	200 rm	0.5 emp/rm	100
		Office	100,000 sf	4 emp/ksf	400
		Fitness Club	35,000 sf	1 emp/ksf	35
		Retail	15,000 sf	2 emp/ksf	30
		Restaurant	34,000 sf	4 emp/ksf	136
3	5555 W. Melrose Ave.	Office	1,273,600 sf	4 emp/ksf	5,094
		Retail	89,200 sf	2 emp/ksf	178
		Stage	21,000 sf	4 emp/ksf	84
		Support	1,900 sf	4 emp/ksf	8
4	1824 N. Highland Ave.	Apartments	118 du	2.25	266
5	6200 Hollywood Blvd.	Apartments	1,014 du	2.25	2,282
		Live/Work	28 du	2.25	63
		Retail/Restaurant	175,000 sf	4 emp/ksf	700
6	5800 W. Sunset Blvd.	Office/Studio Expansion	404,799 sf	4 emp/ksf	1,564
7	1800 Argyle Ave.	Hotel	225 rm	0.5 emp/rm	113
8	956 N. Seward St.	Office	126,980 sf	4 emp/ksf	508
9	6381 W. Hollywood Blvd.	Hotel	80 rm	0.5 emp/rm	40
		Restaurant	15,290 sf	4 emp/ksf	61
10	6300 W. Romaine St.	Office	114,725 sf	4 emp/ksf	459
		Studio	38,072 sf	4 emp/ksf	152
		Other	40,927 sf	4 emp/ksf	164
11	6601 W. Romaine St.	Office	106,125 sf	4 emp/ksf	425
12	6523 W. Hollywood Blvd.	Restaurant	10,402 sf	4 emp/ksf	42
		Office	4,074 sf	4 emp/ksf	16
		Storage	890 sf	0.33 emp/ksf	1
13	6677 Santa Monica Blvd.	Apartments	695 du	2.25	1,675
		Commercial	24,900 sf	4 emp/ksf	100
14	6100 W. Hollywood Blvd.	Apartments	220 du	2.25	530
		Retail/Restaurant	3,270 sf	4 emp/ksf	13
15	6230 Yucca St.	Commercial	2,697 sf	4 emp/ksf	11
		Apartments	114 du	2.25	257
16	5245 Santa Monica Blvd.	Apartments	49 du	2.25	110
		Retail	32,272 sf	2 emp/ksf	65
17	959 Seward St.	Office	241,568 sf	4 emp/ksf	966
18	5550 Hollywood Blvd.	Apartments	280 du	2.25	630
		Retail	12,030 sf	2 emp/ksf	24
19	6417 Selma Ave.	Hotel	180 rm	0.5 emp/rm	90
		Restaurant/club	12,840 sf	4 emp/ksf	51

Table IV.1.2-3 (Continued)
Estimated Service Population from Related Projects within

No. ^a	Project	Description	Size	Conversion Factor ^b	Estimated Service Population
20	1601 Vine St.	Office	100,386 sf	4 emp/ksf	402
		Commercial	2,012 sf	4 emp/ksf	8
21	1149 Gower St.	Apartments	57 du	2.25	128
22	5520 Sunset Blvd.	Target	163,862 sf	2 emp/ksf	328
		Shopping Center	30,887 sf	2 emp/ksf	62
24	1133 Vine St.	Hotel	112 rm	0.5 emp/rm	56
		Café	661 sf	4 emp/ksf	3
25	6121 Sunset Blvd.	Apartments	200 du	2.25	450
		Office	422,610 sf	4 emp/ksf	1,690
		Retail/Restaurant	41,300 sf	4 emp/ksf	165
		Hotel	125 rm	0.5 emp/rm	63
26	1718 Las Palmas Ave.	Condominiums	29 du	2.25	65
		Apartments	195 du	2.25	439
		Retail	985 sf	2 emp/ksf	2
27	1546 Argyle Ave.	Apartments	276 du	2.25	621
		Retail	9,000 sf	2 emp/ksf	18
		Restaurant	15,000 sf	4 emp/ksf	60
28	1541 Wilcox Ave.	Hotel	200 rm	0.5 emp/rm	100
		Restaurant	9,000 sf	4 emp/ksf	36
29	6230 Sunset Blvd.	Apartments	200 du	2.25	450
		Retail	4,700 sf	2 emp/ksf	9
30	5901 Sunset Blvd.	Office	274,000 sf	4 emp/ksf	1,096
		Retail	26,000 sf	2 emp/ksf	52
31	6201 W. Sunset Blvd.	Apartments	731 du	2.25	1,645
		Retail/Restaurant	24,000 sf	4 emp/ksf	96
32	5600 W. Hollywood Blvd.	Apartments	33 du	2.25	74
		Commercial	1,289 sf	4 emp/ksf	5
33	904 N. La Brea Ave.	Apartments	169 du	2.25	380
		Retail	37,057 sf	2 emp/ksf	74
34	707 N. Cole	Apartments	84 du	2.25	189
35	1921 N. Wilcox	Hotel	122 rm	0.5 emp/rm	61
		Restaurant	4,225 sf	4 emp/ksf	17
37	1717 N. Bronson	Apartments	89 du	2.25	200
38	1525 N. Cahuenga	Hotel	64 rm	0.5 emp/rm	32
		Restaurant/Lounge	700 sf	4 emp/ksf	3
		Restaurant	3,300 sf	4 emp/ksf	13
39	901 N. Vine St.	Apartments	70 du	2.25	158
		Commercial	3,000 sf	4 emp/ksf	12
41	1233 N. Highland	Apartments	72 du	2.25	162
		Retail	12,160 sf	2 emp/ksf	24
42	7107 W. Hollywood Blvd.	Apartments	410 du	2.25	923
		Retail	5,000 sf	2 emp/ksf	10
		Restaurant	5,000 sf	4 emp/ksf	20

Table IV.1.2-3 (Continued)
Estimated Service Population from Related Projects within

No. ^a	Project	Description	Size	Conversion Factor ^b	Estimated Service Population
43	1310 N. Cole	Apartments	369 du	2.25	830
		Office	2,570 sf	4 emp/ksf	10
44	5750 W. Hollywood Blvd.	Apartments	161 du	2.25	362
		Commercial	4,747 sf	4 emp/ksf	19
45	6421 W. Selma	Restaurant	1,993 sf	4 emp/ksf	8
		Hotel	114 rm	0.5 emp/rm	57
46	1400 N. Cahuenga	Hotel	221 rm	0.5 emp/rm	111
		Restaurant	3,000 sf	4 emp/ksf	12
47	1868 N. Western Ave.	Apartments	96 du	2.25	216
		Retail	5,546 sf	2 emp/ksf	11
49	5460 W. Fountain	Apartments	75 du	2.25	169
50	6220 W. Yucca	Hotel	210 rm	0.5 emp/rm	105
		Apartments	136 du	2.25	306
		Restaurant	6,980 sf	4 emp/ksf	28
51	5525 W. Sunset Blvd.	Apartments	293 du	2.25	659
		Commercial	33,980 sf	4 emp/ksf	136
52	1657 N. Western Ave.	Apartments	91 du	2.25	205
		Retail	15,300 sf	2 emp/ksf	31
53	1118 N. McCadden	Housing	45 du	2.25	101
		Social Services Support	50,325 sf	4 emp/ksf	201
		Office	17,040 sf	4 emp/ksf	68
		Commercial/Restaurant	1,885 sf	4 emp/ksf	8
		Temporary Housing ^c	100 bed	—	100
54	1717 N. Wilcox	Hotel	133 rm	0.5 emp/rm	67
		Retail	3,580 sf	2 emp/ksf	7
55	6516 W. Selma	Hotel	212 rm	0.5 emp/rm	106
		Bar/Lounge	3,855 sf	4 emp/ksf	15
		Rooftop Bar/Event Space	8,500 sf	4 emp/ksf	34
56	1749 N. Las Palmas	Apartments	70 du	2.25	158
		Retail	3,117 sf	2 emp/ksf	6
57	6901 W. Santa Monica Blvd.	Apartments	231 du	2.25	520
		Restaurant	5,000 sf	4 emp/ksf	20
		Retail	10,000 sf	2 emp/ksf	20
58	5632 W. De Longpre	Apartments	185 du	2.25	416
59	6200 W. Sunset Blvd.	Apartments	270 du	2.25	608
		Restaurant	1,750 sf	4 emp/ksf	7
		Pharmacy	2,300 sf	2 emp/ksf	5
		Retail	8,070 sf	2 emp/ksf	16

Table IV.1.2-3 (Continued)
Estimated Service Population from Related Projects within

No. ^a	Project	Description	Size	Conversion Factor ^b	Estimated Service Population
61	5939 Sunset Blvd.	Apartments	299 du	2.25	673
		Office	38,440 sf	4 emp/ksf	154
		Restaurant	5,064 sf	4 emp/ksf	20
		Retail	3,739 sf	2 emp/ksf	7
63	1718 N. Vine St.	Hotel	216 rm	0.5 emp/rm	108
		Restaurant	4,354 sf	4 emp/ksf	17
64	1600 N. Schrader Blvd.	Hotel	168 rm	0.5 emp/rm	84
		Restaurant	4,028 sf	4 emp/ksf	16
65	1350 N. Western Ave.	Apartments	204 du	2.25	459
		Retail/Restaurant	5,500 sf	4 emp/ksf	22
66	7510 W. Sunset Blvd.	Apartments	213 du	2.25	479
		Retail	20,000 sf	2 emp/ksf	40
		Restaurant	10,000 sf	4 emp/ksf	40
67	1601 N. Las Palmas Ave.	Apartments	86 du	2.25	194
68	7219 W. Sunset Blvd.	Hotel	93 rm	0.5 emp/rm	47
		Restaurant	2,800 sf	4 emp/ksf	11
70	1001 N. Orange Dr.	Office	53,537 sf	4 emp/ksf	214
71	5420 W. Sunset Blvd.	Apartments	735 du	2.25	1,654
		Commercial	95,820 sf	4 emp/ksf	383
72	6650 Franklin Ave.	Senior housing	68 du	2.25	153
73	1719 N. Whitley Ave.	Hotel	156 rm	0.5 emp/rm	78
74	6140 W. Hollywood Blvd.	Hotel	102 rm	0.5 emp/rm	51
		Condominiums	27 du	2.25	61
		Restaurant	11,460 sf	4 emp/ksf	46
75	6400 W. Sunset Blvd.	Residential	232 du	2.25	522
		Commercial	7,000 sf	4 emp/ksf	28
76	6430–6440 W. Hollywood Blvd.	Residential	260 du	2.25	585
		Office	3,580 sf	4 emp/ksf	14
		Retail	11,020 sf	2 emp/ksf	22
		Restaurant	3,200 sf	4 emp/ksf	13
77	6630 W. Sunset Blvd.	Apartments	40 du	2.25	90
		Retail	6,634 sf	2 emp/ksf	13
78	747 N. Western Ave.	Residential	44 du	2.25	99
		Retail	7,700 sf	2 emp/ksf	15
81	712 N. Wilcox Ave.	Apartments	103 du	2.25	232
82	1540–1552 Highland Ave.	Residential	950 du	2.25	2,138
		Hotel	308 rm	0.5 emp/rm	154
		Office	95,000 sf	4 emp/ksf	380
		Commercial Retail	185,000 sf	4 emp/ksf	740
83	1276 N. Western Ave.	Apartments	75 du	2.25	169
84	1723 N. Wilcox Ave.	Apartments	68 du	2.25	153
		Retail	3,700 sf	2 emp/ksf	7

Table IV.1.2-3 (Continued)
Estimated Service Population from Related Projects within

No. ^a	Project	Description	Size	Conversion Factor ^b	Estimated Service Population
86	5651 W. Santa Monica Blvd.	Condominiums	375 du	2.25	844
		Retail	377,900 sf	2 emp/ksf	756
88	6225 W. Hollywood Blvd.	Office	210,000 sf	4 emp/ksf	840
89	1411 N. Highland Ave.	Apartments	76 du	2.25	171
		Commercial	2,500 sf	4 emp/ksf	10
91	5663 Melrose Ave.	Condominiums	96 du	2.25	216
		Retail	3,350 sf	2 emp/ksf	7
92	2580 Cahuenga Blvd. E.	Theater	311 seats	0.02 emp/ksf	6
		Restaurant	5,400 sf	4 emp/ksf	22
		Office	30 emp	—	30
93	1341 Vine St.	Office	285,719 sf	4 emp/ksf	1,143
		Apartments	200 du	2.25	450
		Restaurant	16,135 sf	4 emp/ksf	65
94	925 La Brea Ave.	Retail	16,360 sf	2 emp/ksf	33
		Office	45,432 sf	4 emp/ksf	182
96	7445 W. Sunset Blvd.	Specialty Grocery	32,416 sf	4 emp/ksf	130
98	6421 W. Selma Ave.	Quality Restaurant	17,607 sf	4 emp/ksf	70
99	Hollywood Central Park Hollywood Freeway (US-101)	Park (14.35 acres)	625,086 sf	4 emp/ksf	2,500
		Amphitheater	500 seats	0.02 emp/ksf	10
		Inn	5 rm	0.5 emp/rm	3
		Community Center	30,000 sf	4 emp/ksf	120
		Banquet Space	15,000 sf	4 emp/ksf	60
		Commercial	29,000 sf	4 emp/ksf	116
		Apartments	15 du	2.25	34
101	6409 W. Sunset Blvd.	Hotel	275 rm	0.5 emp/rm	138
		Retail	1,900 sf	2 emp/ksf	4
Related Projects Service Population					53,572
Project Net Service Population^d					1,836
Total Service Population for Related Projects and Project					55,408
Related Projects Residential Service Population					27,242
Project Net Residential Service Population^e					966
Total Residential Service Population for Related Projects and Project					28,208
<p><i>du = dwelling units</i> <i>emp = employees</i> <i>rm = rooms</i> <i>sf = square feet</i> <i>stu = students</i> <i>Totals may not sum due to rounding.</i></p>					

Table IV.1.2-3 (Continued)
Estimated Service Population from Related Projects within

No. ^a	Project	Description	Size	Conversion Factor ^b	Estimated Service Population
<p><i>Related Project Nos. 23, 36, 40, 48, 60, 62, 69, 79, 80, 85, 87, 90, 95, 97, 100, 102, and 103 are not located within the Hollywood Community Police Station service area. Therefore, the service population was not calculated.</i></p>					
<p>^a <i>Project No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.</i></p> <p>^b <i>Service population estimates are based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, including following employee generation rates: 2.25 residents per multi-family dwelling unit; 4 employees per 1,000 square feet for “General Office” land use; 2 employees per 1,000 square feet for “General Retail” land use; 0.5 employee per room for “Hotel” land use; 4 employees per thousand square feet for “High-Turnover Sit-Down Restaurant” and “Quality Restaurant” land uses; 4 employees per 1,000 square feet for “Supermarket” land use; 2 employees per 1,000 square feet for “Pharmacy/Drugstore” land use; 1 employee per 1,000 square feet for “Health Club” land use; 0.33 employee per 1,000 square feet for “Warehousing/Self-Storage” land use; and 0.02 employees per seat for “Movie Theater” land use. The City of Los Angeles VMT Calculator Documentation Guide does not provide employee generation rates for commercial, social services support, community center, park, banquet space, stage, support, studio, and other land uses. Therefore, to provide a conservative estimate with rates made available by the City of Los Angeles VMT Calculator Documentation Guide, the rate 4 employees per 1,000 square feet is applied.</i></p> <p>^c <i>The City of Los Angeles VMT Calculator Documentation Guide does not provide an employee generation rate per bed. Therefore, the service population is assumed to be equivalent to the number of beds.</i></p> <p>^d <i>To provide a conservative cumulative analysis of service population (daytime population and permanent residents), the development scenario that generates the greatest service population is considered herein. The Project’s Office Option with restaurant bungalows would generate a net increase of 1,836 employees.</i></p> <p>^e <i>To provide a conservative cumulative analysis of residential service population, the development scenario that generates the greatest number of new permanent residents on-site is considered herein. The Residential Option would generate the greatest residential population (966 residents).</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>					

population plus the Project’s maximum of up to 966 net new residents²⁷ would result in an estimated increase of 28,208 residents in the Hollywood Division. Accordingly, the Hollywood Division residential police service population would increase from 165,000 to 193,208 residents, which would decrease the officer-to-resident ratio from the current ratio of 2.3 officers per 1,000 residents to 2.0 officers per 1,000 residents.²⁸

The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Hollywood Division, which could increase based on per capita crime rates. Accordingly, cumulative population growth could increase the demand for LAPD services in the Hollywood Division. This cumulative population growth could increase the demand for LAPD services in the Hollywood Division.

²⁷ *To provide a conservative cumulative analysis of residential service population, the development scenario that generates the greatest number of new permanent residents on-site is considered (i.e., the Project’s Residential Option).*

²⁸ *387 officers ÷ 193,208 residents = 0.0023 officer per resident = 2.0 officers per 1,000 residents.*

However, the Project would only represent a fraction of this growth. In addition, as previously discussed, due to the Project design features that, the Project would implement (e.g., Project Design Features POL-PDF-2 through POL-PDF-7) and the Project's contribution to the General Fund, the Project is not anticipated to generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site.

In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes review by the LAPD to ensure sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the City's Framework Element, as discussed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time.²⁹ As such, it is premature and speculative to estimate any specific type, location, or intensity of future police resource expansions, whether in terms of personnel or facilities. In addition, it is anticipated that the related projects would implement adequate security features similar to the Project's, including mitigation measures if appropriate, which would reduce cumulative impacts to police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing, as deemed appropriate.

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

With regard to cumulative impacts on police protection, written correspondence from LAPD states that the Project, individually or combined with other past, present or future

²⁹ *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

projects, will not result in the need for new or altered facilities.³⁰ In addition, consistent with the *City of Hayward v. Board of Trustees of California State University* ruling and the requirements stated in California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332, Negative Declaration, or Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

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

(2) Mitigation Measures

Cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to police protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remains less than significant.

³⁰ *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, LAPD, August 17, 2020. See Appendix N of this Draft EIR.*