

IV. Environmental Impact Analysis

H.2 Public Services—Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services within the Project area and provides an analysis of the Project’s potential impacts related to police protection facilities. The focus of the analysis is the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site. This section is based in part on information provided by the LAPD’s Community Relationship Division, in a letter dated July 29, 2019, which is included in Appendix G of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution 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.” 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 mandates 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 other 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 and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.¹

(b) California Vehicle Code

Section 21806 of the California Vehicle Code pertains to emergency vehicles responding to Code 3 incidents/calls.² This section of the California Vehicle Code 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.

(2) Local

(a) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines citywide policies regarding land use, including infrastructure and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood must have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.³ Objective 9.13 and Policy 9.13.1 require the monitoring and reporting of police statistics and population projections for the purpose of

¹ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847.

² 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.

³ *The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services.*

evaluating existing and future police protection needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet such needs. Furthermore, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance agreements with other local law enforcement agencies, state law enforcement agencies, and the National Guard. In addition to the Framework Element, the City's General Plan Safety Element recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies.

Presently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. With its specialized crime control model, the COMPSTAT system implements a multi-layer approach to police protection services by providing a program where crime data can be collected, mapped, and analyzed to provide statistical and geographical information of trends in crime. This information provides police departments a "snapshot" of crime activity in their jurisdiction and allows police managers to focus and develop plans to reduce crime in high crime areas.

(b) The City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter, Article V, Section 570; the City of Los Angeles Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2.

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

(c) West Los Angeles Community Plan

The Project Site is located within the West Los Angeles Community Plan area. The Community Plan, adopted on July 27, 1999, and last amended on September 7, 2016, includes the following objectives and policies that are relevant to police protection :

- Objective 8-1: To provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.

- Policy 8-1.1: Consult with the Police Department in the review of development projects and land use changes to determine law enforcement needs and requirements.
- Objective 8-2: To increase the ability to minimize crime and provide adequate security.
 - Policy 8-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with existing policing, foot and bicycle patrols, watch programs and regular communication with neighborhood and civic organizations.
 - Policy 8-2.2: Ensure adequate lighting around residential, commercial, and industrial buildings in order to improve security.
 - Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility.

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.⁴ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD's 21 community police stations.⁵ Each geographic bureau is comprised of four to five geographic areas/police stations.⁶

As of December 2019, the departmental staffing resources within the LAPD included 10,033 sworn officers. Based on a total City population of 4,029,741, the LAPD currently has an officer-to-resident ratio of approximately 2.5 officers for every 1,000 residents.⁷

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.⁸

⁴ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed November 23, 2020.

⁵ LAPD, *Community Police Station Address Directory*, www.lapdonline.org/our_communities/content_basic_view/6279, accessed November 23, 2020.

⁶ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed November 23, 2020.

⁷ LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19–12/28/19*, <http://assets.lapdonline.org/assets/pdf/cityprof.pdf>, accessed January 7, 2020.

The West Bureau oversees operations in Hollywood, Wilshire, Pacific, and West Los Angeles. The West Bureau also oversees the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.⁹

(2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within the West Los Angeles service area, which is served by the West Los Angeles Community Police Station. As shown in Figure IV.H.2-1 on page IV.H.2-6, the West Los Angeles Community Police Station is located at 1663 Butler Avenue, approximately 2.6 miles west of the Project Site. The West Los Angeles Police Station service area covers approximately 65.14 square miles and is bounded by Mulholland Drive to the North; the Santa Monica Freeway and Washington Boulevard to the South; the San Diego Freeway, La Cienega Boulevard, and City of Los Angeles boundary to the East; and the Pacific Ocean to the West.¹⁰

The West Los Angeles Police Station serves a population of approximately 228,000 residents and is staffed by approximately 260 sworn officers and 28 civilian support staff. The average response time for emergency and non-emergency calls of the West Los Angeles Police Station in 2018 was 6.2 minutes and 41.4 minutes, respectively.¹¹ Based on the police service population of 228,000 residents, the officer-to-resident ratio of the West Los Angeles Police Station is approximately 1.14 officers per 1,000 residents. As such, the existing officer-to-resident ratio in the West Los Angeles Area is lower than the citywide ratio of 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.H.2-1 on page IV.H.2-7 provides a comparison of the West Los Angeles Area and citywide data regarding crimes as reported by the LAPD based on residential populations only. As shown therein, based on the most recent year to date data made available by the LAPD Community Outreach and Development Division and COMPSTAT, approximately 5,253 crimes were reported within the West Los Angeles Area

⁸ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed November 23, 2020.

⁹ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed November 23, 2020.

¹⁰ *Written correspondence from Christopher Gibson, Community Outreach and Development Division, Los Angeles Police Department, July 29, 2019. See Appendix G of this Draft EIR.*

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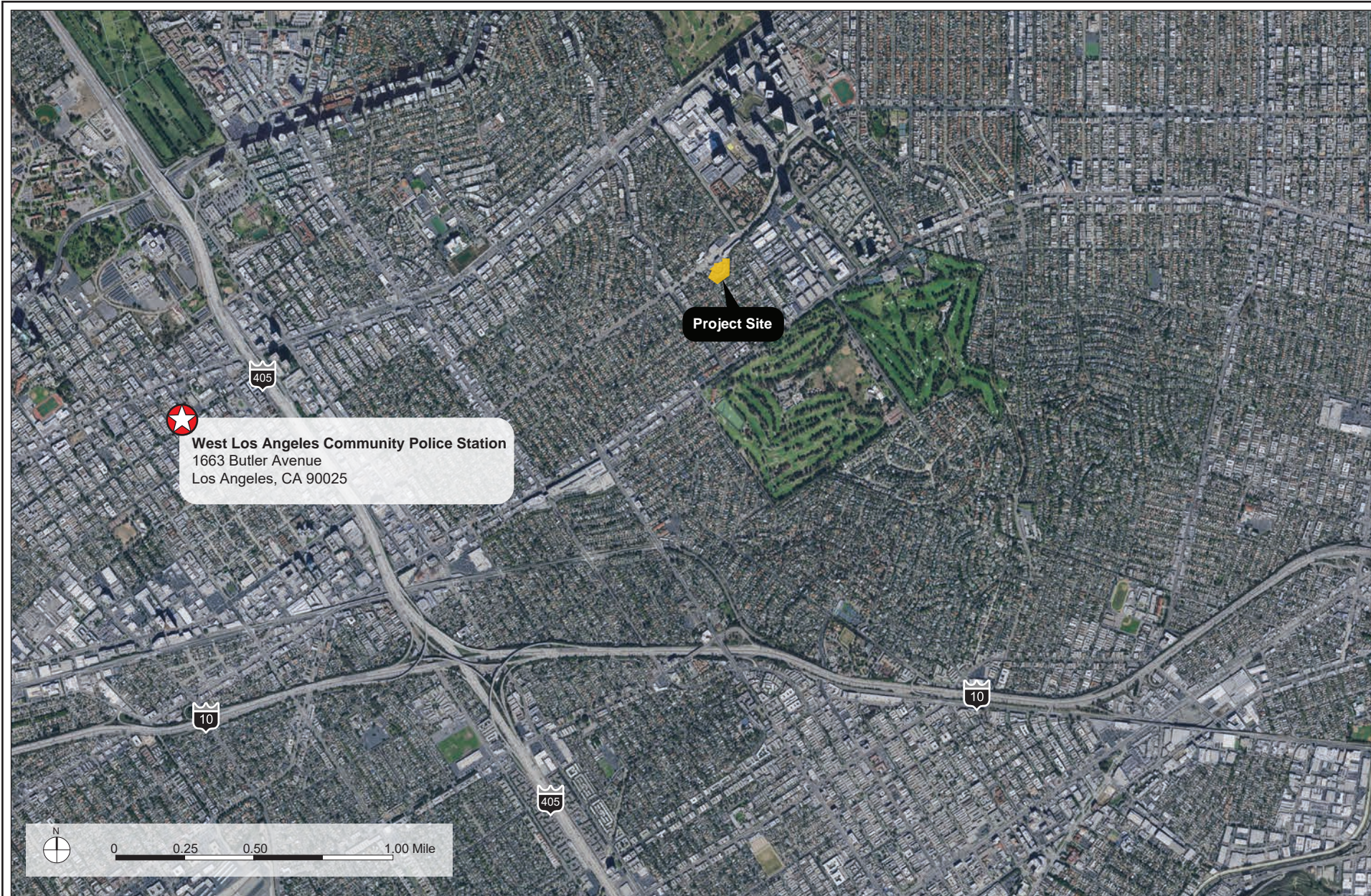


Figure IV.H.2-1
Police Station Serving the Project Site

**Table IV.H.2-1
2019 YTD Crimes—West Los Angeles Area and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
West Los Angeles Area	5,253	228,000	23/1,000	0.023
Citywide	120,828	4,029,741	30/1,000	0.029

Source: LAPD, COMPSTAT Unit, COMPSTAT West Los Angeles Area Profile 12/01/19–12/28/19 and COMPSTAT Citywide Profile 12/01/19–12/28/19.

and 120,828 crimes were reported citywide. Based on the service population of the West Los Angeles Community Police Station, approximately 23 crimes per 1,000 residents (0.023 crime per capita) were reported in the West Los Angeles Area and 30 crimes per 1,000 residents (0.030 crime per capita) were experienced citywide.

Based on the number of sworn officers in the West Los Angeles Community Police Station (260 sworn officers), the current 2019 ratio of crimes per officer is 20.2 crimes per officer in comparison to a 2019 citywide ratio of 12 crimes per officer (10,033 sworn officers citywide). Thus, the West Los Angeles Area has a higher crime per officer ratio compared to the citywide ratio.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines 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 (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.

For this analysis, the Appendix G Threshold listed above is relied upon. The analysis utilizes the following factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold question:

- 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 City's 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, and in turn, result in the need for new or physically altered government facilities. 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 serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical data associated with the police station serving the Project Site and citywide services, including the ratio of crimes to residents and the ratio of sworn police officers to residents. In consideration of the above factors, a determination is made as to whether the LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAPD was consulted and its responses were incorporated regarding the Project. Project design features that would reduce the impact of the Project on police services are also described.

The need for or deficiency in adequate police services in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional police services resulting in the need to construct new police facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to police services that will result from a project is determined by whether the construction of new or expanded police facilities is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of police facilities in the Project area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event that the City determines that expanded or new emergency 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 or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

c. Project Design Features

The following project design features are proposed to increase Project Site security and minimize the Project's demand for police protection services:

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: During operation, the Project will include private 24-hour on-site security, a closed circuit security camera system, and keycard entry for the building and the parking areas.

Project Design Feature POL-PDF-3: During operation, the Project will provide sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.

Project Design Feature POL-PDF-4: During operation, the Project will provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: Prior to the issuance of a building permit, the Applicant will submit a diagram of the Project Site to the LAPD's West Los Angeles Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Analysis of Project Impacts

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

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the West Los Angeles Area since the daytime population generated 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 security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Construction activities could also potentially affect LAPD response due to reduced capacities of adjacent streets. As discussed in Section IV.I, Transportation, of this Draft EIR, construction activities are expected to be primarily contained within the boundaries of the Project Site. As part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned as a private street. Therefore, construction activities would occur along the existing portion of Bellwood Avenue within the Project Site. Construction of the Project and the realignment of Bellwood Avenue would require temporary rerouting of vehicular and pedestrian traffic. However, outside of the realignment area of Bellwood Avenue, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained and would not be impeded, including emergency access to properties adjacent to the Project Site. In addition, as discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., signs, flag persons, 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 to the Project Site and vicinity as emergency vehicles have the ability to avoid traffic by 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, construction activities associated with the Project would not generate a demand for additional police protection services that would necessitate the provision of new or physically altered government facilities. Accordingly, the Project would not result in adverse physical impacts associated

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

(b) Operation

As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. The Project would replace the existing residential and visitor population on the Project Site and would increase LAPD's residential service population in the West Los Angeles Area.

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct 192 senior housing residential units, including 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. As shown in Table IV.H.2-2 on page IV.H.2-12, based on the generation rates used in the City of Los Angeles VMT Calculator, the Project's estimated total police service population would be 231 residents.¹² The Project is also estimated to generate approximately 88 employees.¹³

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three multi-family residential developments, consisting of 112 units, and associated structures and parking. To accommodate the Project's proposed uses, all existing structures would be removed. As shown in Table IV.H.2-2, assuming the 112 units were each occupied by one person and using the City of Los Angeles VMT Calculator population estimate for the Project, the Project would result in a net increase of 119 residents¹⁴ plus approximately 88 employees on a given day. As such, the Project would result in a net increase in the service population requiring police protection services from the LAPD.

¹² Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H. The VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents. The resulting officer-to-resident ratio would be the same, and for the same reasons described below, even with a net increase of 132 residents, Project operation would not result in a need to construct any new police facilities or modify any existing facilities, and the conclusions of the analysis would remain the same.

¹³ Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.

¹⁴ As noted above, the VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents. The resulting officer-to-resident ratio would be the same, and for the same reasons described below, even with a net increase of 132 residents, Project operation would not result in a need to construct any new police facilities or modify any existing facilities, and the conclusions of the analysis would remain the same.

**Table IV.H.2-2
Estimated Project Residential Service Population for the Project Site**

Land Use	Units	Conversion Factor	Total Police Service Population
Existing			
Residential—Apartments	112 du	1 person/unit ^a	112
Proposed			
Residential—Apartments	192 du		231 ^b
Project Net Residential Police Service Population (Proposed – Existing)			119
<hr/> <i>du = dwelling units</i> ^a <i>To provide a conservative analysis, the existing police service population accounts for an existing residential population of 112 assuming one person within each occupied unit rather than the 2.25 persons per unit for “Multi-Family Residential” land use provided by the City of Los Angeles VMT Calculator Documentation Guide. The majority of the existing housing units are studio units, and the existing units range in size from approximately 275 to 375 square feet.</i> ^b <i>Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H. As noted above, the VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents. The conclusions of the analysis would remain the same.</i> <i>Source: Eyestone Environmental, 2021.</i>			

As discussed above, the West Los Angeles Area, in which the Project Site is located, is served by the West Los Angeles Community Police Station located approximately 2.6 miles west of the Project Site and is staffed by 260 sworn officers and a 28-person civilian support staff. The Project’s net residential service population of up to 119 residents would increase the existing police service population of the West Los Angeles Community Police Station from 228,000 persons to up to 228,119 persons. Similar to the current officer-to-resident ratio for the West Los Angeles Area, the increase in police service population would result in an officer-to-resident ratio of 1.14 officers per 1,000 residents. Therefore, the Project would not cause a substantial change in the officer-to-resident ratio for the West Los Angeles Area and West Los Angeles Community Police Station.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-5, 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 private on-site security, a closed circuit security camera system, and keycard entry for the building and the parking areas. In addition, the Project would provide sufficient lighting of buildings and walkways to provide for pedestrian

orientation and to clearly identify a secure route between parking areas and points of entry into buildings, as set forth by Project Design Feature POL-PDF-3, as well as provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment, as set forth by Project Design Feature POL-PDF-4. Furthermore, as specified in Project Design Feature POL-PDF-5, the Applicant would submit a diagram of the Project Site to the LAPD's West Los Angeles Area Commanding Officer that includes access routes and any additional information that might facilitate police response. In addition to the implementation of these site security features, the Project would generate revenues to the City's General Fund (in the form of property taxes) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.¹⁵ The proposed Project Design Features as well as the Project's contribution to the General Fund would help offset the Project-related increase in demand for police services. Thus, as provided by the LAPD in their letter, included in Appendix G of this Draft EIR, a project of this size could have a minor impact on police services in the West Los Angeles Area.

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, to the Project Site would continue to be provided along Bellwood Avenue from Olympic Boulevard. As part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned and may become a private street.¹⁶ Emergency access to all buildings would continue to be provided in accordance with regulatory requirements. In addition, the Project would not include the installation of any barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within or in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. The Project would also result in a net decrease in daily traffic in the Project vicinity as described in Section IV.I. Transportation, of this Draft EIR. Furthermore, in accordance with CVC Section 21806, drivers of police emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion.

Additionally, as specified above in the Regulatory Framework, in conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional

¹⁵ *City of Los Angeles, Proposed Budget for the Fiscal Year 2020-21.*

¹⁶ *Through public access would be maintained on the realigned portion of Bellwood Avenue regardless of whether it is a public or private street.*

public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.¹⁷

Based on the above analysis, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain LAPD’s capability to serve the Project Site. Thus, impacts to police protection services would be less than significant.

(2) Mitigation Measures

Project-level impacts related 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 were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2023 (the Project’s anticipated buildout year) includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, there are six related projects located in the vicinity of the Project Site. The projected growth reflected by the related projects is a conservative assumption, as some of the related projects may not be built out by 2023, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City and will be incorporated into the West Los Angeles Community Plan update, which the Department of City Planning is in the process of preparing. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 6 are fully built out by 2023, unless otherwise noted. All six related projects fall within the boundaries of the West Los Angeles Area and are served by the West Los Angeles Community Police Station.

¹⁷ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal, App. 4th 833, 843.

(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 that of nearby related projects, coordination among these multiple construction sites would be required and implemented through each development's construction management plan, as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each related project 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 have the ability to avoid traffic, pursuant to CVC Section 21806.

(b) Operation

As shown in Table IV.H.2-3 on page IV.H.2-16, based on the City of Los Angeles VMT Calculator Documentation Guide, the residential component of related projects that fall within the boundaries of the West Los Angeles Area and that would be served by the West Los Angeles Community Police Station would generate approximately 2,589 residents,¹⁸ plus the Project's net residential service population of 119 residents, for a total estimated service population increase of 2,708 residents in the West Los Angeles Area. When considering these estimates, the West Los Angeles Area's police service population would increase from 228,000 to 230,708 residents, which would in turn decrease the officer-to-resident ratio for the West Los Angeles Area from the current ratio of 1.14 officers per 1,000 residents to 1.13 officers per 1,000 residents. The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the West Los Angeles Area, which could increase solely based on per capita crime rates. Accordingly, cumulative population growth could increase the demand for LAPD services in the West Los Angeles Area. However, as previously discussed, due to the Project Design Features that would be implemented as part of the Project 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.

¹⁸ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the generation rate 2.25 persons per unit for "Multi-Family Residential" land use is applied to the residential component of related projects.

Table IV.H.2-3
Estimated Service Population from Related Projects within West Los Angeles Area

No.^a	Project Name/Address	Land Use	Unit/Area^b	Conversion Factor^c	Service Population^c
1	Westfield Century City NCP Project 10250 W. Santa Monica Blvd.	Condominiums	262 du	2.25/du	590
		Shopping Center	358,881 sf	2.0/ksf	718
2	Century City Center ^d 1950 S. Avenue of the Stars	Condominiums	483 du	2.25/du	1,087
3	Apartments 10306 W. Santa Monica Blvd.	Apartments	116 du	2.25/du	261
4	Century Plaza (Hyatt Regency Hotel) 2025 S. Avenue of the Stars	Condominiums	193 du	2.25/du	435
		Hotel	240 rm	0.5/rm	120
		Office	117,647 sf	4.0/ksf	471
		Retail	93,814 sf	2.0/ksf	188
		Spa/Fitness	16,800 sf	1.0/ksf	17
		Restaurant	15,463 sf	4.0/ksf	62
5	Apartments 10400 W. Santa Monica Blvd.	Apartments	96 du	2.25/du	216
6	Fox Studios Master Plan 2016 10201 W. Pico Boulevard	Creative Office	383,900 sf	4.0/ksf	1,536
		Specialty Space	327,400 sf	4.0/ksf	1,310
		Stage Space	33,200 sf	4.0/ksf	133
		Facility Support	331,100 sf	4.0/ksf	1,325
		Utility Support	23,700 sf	4.0/ksf	95
Related Projects Service Population					8,564
Project Net Police Service Population					207
Total Residential Service Population for Related Projects and Project					8,771
Related Projects Residential Service Population					2,589
Net Project Residential Service Population					119
Total Residential Service Population for Related Projects and Net Project					2,708

du = dwelling units

sf = square feet

rm = rooms

Numbers may not sum precisely due to rounding.

^a *Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR. Related projects based on data from Los Angeles Department of Transportation and Department of City Planning as of June 12, 2019 (release of the Project's Notice of Preparation).*

^b *Based on guidance from the LAPD, the analysis focuses on the increased population associated with residential uses.*

Table IV.H.2-3 (Continued)
Estimated Service Population from Related Projects within West Los Angeles Area

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Conversion Factor ^c	Service Population ^c
^c For employees, the following LADOT VMT Calculator employee generation factors were used: Retail 2.0/ksf; Hotel 0.5/rm; Office 4.0/ksf; Health Club 1.0/ksf; and High-Turnover Sit-Down Restaurant 4.0/ksf. For residents, the generation rate of 2.25 persons per unit for “Multi-Family Residential” land use was used based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.					
^d The related project information reflects an alternative residential project, which proposes the development of 483 dwelling units, that was entitled in April 2006.					
Source: Eyestone Environmental, 2021.					

Additionally, similar to the Project, each related project would be subject to the City’s routine 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. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as listed 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.¹⁹ In addition, it is anticipated that the related projects would also implement project design features similar to the Project, 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 tax revenue, etc.) that could potentially be applied toward the provision of new 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 in the West Los Angeles Area, and the Project would not contribute to a cumulative impact relative to emergency response times. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

¹⁹ City of Los Angeles, *Proposed Budget for the Fiscal Year 2020-21*.

Additionally, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(b) above, the obligation to provide adequate police protection is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, basic cars, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and 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 or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Based on the above, the Project and related projects would not result in significant cumulative 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 service. As such, the Project's contribution to cumulative impacts on police protection during construction and operation would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related 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 or included, and the impact level remains less than significant.