

IV. Environmental Impact Analysis

H.2 Public Services—Police Protection

1. Introduction

This section analyzes whether the Project's 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 is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated September 30, 2019 and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix Q to 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 Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management (OEM)
- City of Los Angeles General Plan, including
 - Framework Element
 - Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- LAPD Computer Statistics Unit COMPSTAT Program

- LAPD Guidelines and Plan Review

(1) State

(a) California Vehicle Code

Section 21806 of the CVC 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 for 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, as well as 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

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.

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.

(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) Local

(a) Los Angeles General Plan

(i) Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework), 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 General Plan Framework 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.H.2-1 on page IV.H.2-4.

(ii) Wilshire 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

**Table IV.H.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/> <i>Source: City of Los Angeles 2001.</i>	

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 City's General Plan Framework 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.F, Land Use, of this Draft EIR, the Project is located within the Wilshire Community Plan area. The Wilshire Community Plan, adopted on September 19, 2001, describes specific goals, objectives, and policies related to police protection services and public safety. Goals, objectives, and policies relevant to the Project are as follows:

- Goal 8: Continue to provide the Wilshire Community with adequate police facilities and services to protect its residents for criminal activity, reduce the incidence of crime, and provide other necessary law enforcement services.

- Objective 8-1: Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
 - Policy 8-1.1: Consult with the LAPD in the review of new development projects and land use changes to determine law enforcement needs.
- Objective 8-2: Improve the ability of the community and police department to minimize crime and provide adequate security for all residents.
 - 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, community watch programs, and regular communication with neighborhood and civic organizations.
 - Policy 8-2.2: Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.
 - Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.

(b) City of Los Angeles Charter

The City Charter at Section 570 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 in regards to new development.

(d) LAPD Computer Statistics Unit 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.²

(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;
- 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;

² LAPD, COMPSTAT, www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed January 25, 2021.

- 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) Overview of Existing LAPD Service Area and Bureaus

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley Bureau.³ These four bureaus are further divided into 21 service areas, which are serviced by the LAPD’s 21 community police stations.⁴ Each geographic bureau is comprised of four to five geographic area police stations.⁵

As of December 2019, the departmental staffing resources within the LAPD includes 10,033 sworn officers. Based on a total City population of 4,029,741, the LAPD citywide officer-to-resident ratio is 2.490 officers for every 1,000 residents.⁶

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.⁷ The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, and West Los Angeles.⁸ 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 Within the West Bureau, the Project Site is located within the Wilshire Division.

³ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 12, 2021.

⁴ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed April 12, 2021.

⁵ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 12, 2021.

⁶ LAPD, *COMPSTAT Citywide Profile 12/01/19 to 12/28/19*.

⁷ LAPD, *About West Bureau*, http://lapdonline.org/west_bureau/content_basic_view/1869, accessed April 12, 2021.

⁸ LAPD, *About West Bureau*, http://lapdonline.org/west_bureau/content_basic_view/1869, accessed April 12, 2021.

⁹ LAPD, *About West Bureau*, http://lapdonline.org/west_bureau/content_basic_view/1869, accessed April 12, 2021.

(2) LAPD Community Police Station

Within the Wilshire service area, the Project Site is served by the Wilshire Community Police Station located at 4861 West Venice Boulevard, approximately 3.1 miles southeast of the Project Site, as shown in Figure IV.H.2-1 on page IV.H.2-9. There are no current capital improvement plans for the construction or expansion of police facilities in the Project area. The Wilshire Community Police Station service area covers approximately 13.97 square miles and is bounded by: La Cienega Boulevard to the West; the Santa Monica Freeway (Interstate 10) to the South; Arlington Avenue, Bronson Avenue, Plymouth Boulevard, Gower Street, and Seward Street to the East; and to the North is Santa Monica Boulevard, Melrose Avenue, and Willoughby Avenue. The average response time for emergency and non-emergency calls of the Wilshire Community Police Station in September 2019 was 4.2 and 30 minutes, respectively.¹⁰

Based on data made available by the LAPD Community Relationship Division, the Wilshire Division includes a service population of approximately 249,200 persons and is staffed by approximately 267 sworn officers and 13 civilian support staff.¹¹ As such, the Wilshire Division officer to resident ratio is approximately 1.072 officers per 1,000 residents.¹² Thus, the officer-to-resident ratio is less than the citywide ratio of 2.490 officers per 1,000 residents.

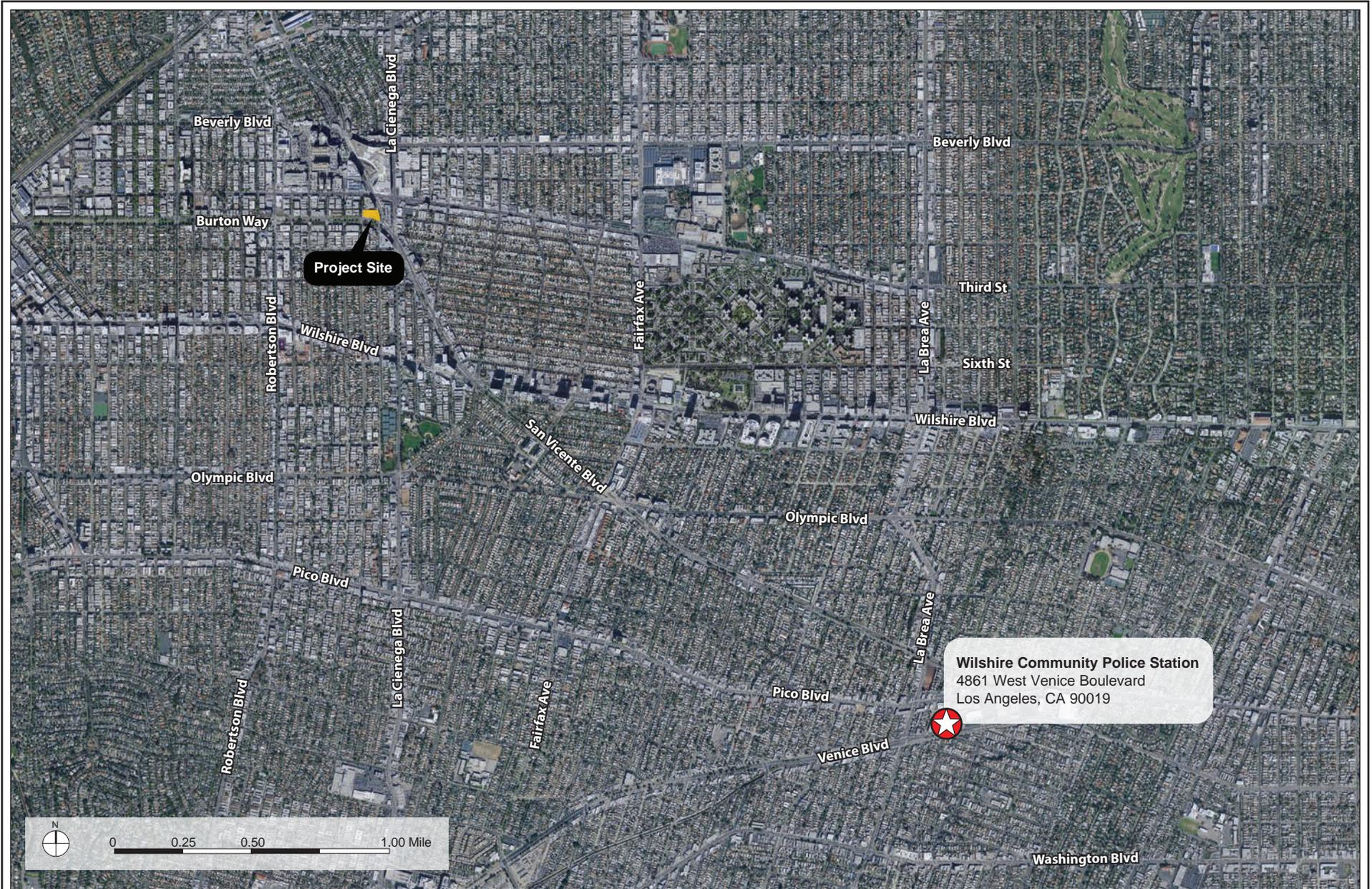
(3) LAPD Crime Statistics

Table IV.H.2-2 on page IV.H.2-10 provides a comparison of the Wilshire Division and citywide data regarding Part I crimes as reported by the LAPD based on residential populations only. As shown therein, based on the most recent data made available by LAPD for 2019, approximately 6,305 crimes were reported within the Wilshire Division and 120,828 crimes were reported citywide. Based on the service population of the Wilshire Community Police Station, approximately 25.3 crimes per 1,000 residents (0.0253 crime per capita) were reported in the Wilshire Division and 30.0 crimes per 1,000 residents (0.0300 crime per capita) were experienced Citywide. Based on available data and written correspondence, LAPD identifies property-related crimes (e.g., personal/other theft;

¹⁰ *Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, September 30, 2019. See Appendix Q to this Draft EIR.*

¹¹ *Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, September 30 2019. See Appendix Q to this Draft EIR.*

¹² *Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, September 30, 2019. See Appendix Q to this Draft EIR.*



Wilshire Community Police Station
 4861 West Venice Boulevard
 Los Angeles, CA 90019

Project Site

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

Source: Apple Maps, 2019; Eystone Environmental, 2019.

**Table IV.H.2-2
2019 Part I Crimes—Wilshire Division and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Wilshire Division	6,305	249,200	25.3/1,000	0.0253
Citywide	120,828	4,029,741	30.0/1,000	0.0300
<hr/> <p><i>Source: LAPD, COMPSTAT Unit, COMPSTAT Wilshire Area Profile 12/01/19 to 12/28/19 and LAPD, COMPSTAT Citywide Profile 12/01/19 to 12/28/19.</i></p>				

burglaries; BTFV [burglary or theft from motor vehicle]) as the most frequent crimes in the Wilshire Division.

Based on the number of sworn officers in the Wilshire Community Police Station (267 sworn officers), the 2019 ratio of crimes per officer is 23.6 crimes per officer in comparison to a 2019 citywide ratio of 12.0 crimes per officer (10,033 sworn officers citywide). Thus, the Wilshire Division 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.

In assessing impacts related to police protection services in this section, the City uses Appendix G as the threshold of significance. The *L.A. CEQA Thresholds Guide* were used as factors where applicable and relevant to assist in analyzing the Appendix G thresholds. Specifically, the *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors 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 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, new or physically altered government facilities. As such, the determination of significance relative to impacts on police services is based in part 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 focuses on the increase in the residential population from the Project and 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. The net population increase resulting from a project is based on the Police Service Population Conversion Factors contained in the *L.A. CEQA Thresholds Guide*. 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.

However, the need for or deficiency of adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact.¹³ 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.¹⁴ 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

¹³ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal, App. 4th 833, 843, 847.

¹⁴ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal, App. 4th 833, 843, 847.

of whether a project would cause a significant impact to the environment related to police services is determined based on whether construction of new or expanded police facilities would result in a reasonably foreseeable direct or indirect effect on the environment.

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 historical development of police facilities, that in the event 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 Section 15301 or 15332, or Negative Declaration or Mitigated Negative Declaration.

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 a closed circuit camera system and keycard entry for the residential building and the residential parking areas.

Project Design Feature POL-PDF-3: During operation, the Project will provide 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: During operation, the Project will provide 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: 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's Wilshire Service 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 at the Project Site that would substantially increase the police service population of the Wilshire 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 increase in 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 and potential crimes occurring 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, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on San Vicente Boulevard and Burton Way. As such, sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Also, given the permitted hours of construction and nature of construction projects, most of the construction worker trips would occur outside of the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, as discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic 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. The Construction Traffic Management Plan would identify the

location of any temporary street parking or sidewalk closures, provide for the installation of warning signs, and provide access to abutting properties. Appropriate construction and worksite traffic control measures (e.g., detour signs, delineators, flag persons, etc.) would also be utilized, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, LAPD response would not be significantly impacted by construction-related traffic 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 analysis and compliance with State law, construction-related impacts associated with the Project would not generate demand for additional police protection services that would substantially exceed the capability of LAPD to serve the Project Site. **Therefore, during construction the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities construction of which would cause significant environmental impacts. Accordingly, the Project's impact on police protection services during project construction would be less than significant, and no mitigation measures are required.**

(b) Operation

As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. The Project would introduce a new residential population to the Project Site and would increase LAPD's residential service population in the Wilshire Area.

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes the development of a 19-story, multi-family residential building with 153 residential units; the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral, with a resulting floor area of approximately 7,790 square feet; and the removal of three existing ancillary church buildings, including the parish rectory, a building with offices and meeting rooms and a social hall, with an aggregate floor area of 12,370 square feet, and their replacement with a new three-story building with approximately 23,649 square feet of ancillary church uses, including offices, meeting rooms, and a multi-purpose room.

The Project would introduce a new residential population to the Project Site, increasing LAPD's residential service population in the Wilshire Division. Specifically, as shown in Table IV.H.2-3 on page IV.H.2-15, the Project's estimated net police service population would be 508 persons, including 459 residents. In addition, following completion of the Project, Our Lady of Mt. Lebanon would resume its current mass schedule and continue to hold 25 to 30 events per year, including weddings, funerals,

**Table IV.H.2-3
Estimated Project Service Population for the Project Site**

Land Use	Units	Conversion Factor^{a,b}	Total Police Service Population
Existing to be Removed			
Parish Rectory/Meeting Rooms	2,520 sf	0.004 person/sf	11
Social Hall/Multi-Purpose Room	5,426 sf	0.004 persons/sf	22
Offices	4,424 sf	0.004 persons/sf	18
<i>Subtotal Existing</i>			51
Proposed			
Residential	153 du	3 persons/unit	459
Cathedral	942 sf	0.004 persons/sf	4
Parish Rectory/Meeting Rooms	7,649 sf	0.004 person/sf	31
Social Hall/Multi-Purpose Room	12,600 sf	0.004 persons/sf	51
Offices	3,400 sf	0.004 persons/sf	14
<i>Subtotal Proposed</i>			559
Project Net Police Service Population (Proposed – Existing)			508 persons (459 residents)

du = dwelling units

sf = square feet

^a *Based on Service Population Conversion Factors provided in the L.A. City CEQA Thresholds Guide for purposes of evaluating impacts on LAPD services. These estimates are conservative and do not precisely reflect the Project's anticipated demographics. The LAPD Service Population Conversion Factors also vary from the population and employment projections provided in this Draft EIR. Specifically, as directed by City Planning, this Draft EIR considers a rate of 2.41 persons per multi-family unit based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. [This was updated following publication of the Initial Study included as Appendix A to the Draft EIR, which was based on a rate of 2.6 persons per unit.] Use of the LAPD Service Population Conversion Factors yield more conservative population estimates, which are used herein to provide a conservative analysis of Project impacts on police services.*

^b *The following L.A. City CEQA Thresholds Guide, K. Police Service Population Conversion Factors were used: Residential (Studio, one-, and two-bedroom units): 3 persons/unit and Office: 4 persons/1,000 sf.*

Source: Eyestone Environmental, 2021.

fundraisers and other church events. These events would primarily take place in the multi-purpose room, which would have a capacity of approximately 475 people. While the frequency of these events would remain the same, the size of some of these events could increase because the multi-purpose room would have a larger capacity than the existing social hall, which has a capacity of approximately 200 people. The development of the Project would not increase the number of church employees at the Project Site.

As discussed above, the Project Site is served by the Wilshire Community Police Station located approximately 3.1 miles southeast of the Project Site, which is staffed by 267 sworn officers and a 13-person civilian support staff. The Project's estimated residential service population of 459 residents would increase the existing police service population of the Wilshire Community Police Station from 249,200 residents to approximately 249,659 residents. Written correspondence from LAPD states that a project this size could have a minor impact on police services in the Wilshire Division. With the increase in the police service population, the officer-to-resident ratio for the Wilshire Area would have a minor decrease in the ratio from approximately 1.072 officers per 1,000 residents to 1.069 officers per 1,000 residents. The ratio would be less than the citywide ratio of 2.49 officers per 1,000 residents. In the Wilshire Division, the ratio change is only 0.00283 officers per 1,000 residents, which would present a minimal and imperceptible change from existing conditions. The Project would not cause a substantial change in the officer-to-resident ratio for the Wilshire Division and Wilshire Community Police Station.

The additional population associated with the Project could potentially have an effect on crime in the Wilshire Division, which could increase based on per capita crime rates. As shown in Table IV.H.2-2 on page IV.H.2-10, approximately 6,305 crimes were reported in the Wilshire Division for 2019, which equates to a crime rate of approximately 25.3 crimes per 1,000 residents, or 0.0253 crime per capita. Based on the assumption that the annual crime rate in Wilshire Division would remain constant at 0.0253 crime per capita, the Project's residential service population of 459 residents could potentially generate approximately 12 new crimes per year.¹⁵ This would increase the annual number of crimes reported in the Wilshire Division from 6,305 to 6,317 reported crimes per year, an increase of approximately 0.19 percent. Thus, the Project would not result in a substantial change in crimes in the Wilshire Division.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would also 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

¹⁵ *Total crimes generated by the Project = estimated crime rate of 0.0253 crime per capita × Project-related residential service population of 459 persons = approximately 12 crimes.*

Project Design Features POL-PDF-6, the Applicant would 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 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.¹⁶ The Project Design Features and the Project's contribution to the General Fund could be applied in part toward enhanced police services and related staffing in the Wilshire Division, as deemed appropriate, and would thus further reduce any minor Project impacts. As stated above, however, there are no current capital improvement plans for the construction or expansion of police facilities in the Project area, and the Project would not trigger the need for such new facilities.

The following discussion of emergency response is provided for informational purposes only. As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided via a driveway along the publicly-accessible alley the abuts the Project Site to the north. This driveway would be used by emergency vehicles and would provide access to the proposed five-level subterranean parking structure. 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. In addition, while the Project would introduce new uses to the Project Site which would generate additional vehicle trips in the vicinity 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, increases in Project-related traffic would not substantially affect the ability of police officers and vehicles to access the Project Site in an emergency.

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 the California State University* ruling, the City is obligated to provide adequate public safety services, including police protection services, and the need for additional public safety services is not an environmental impact that CEQA requires a project proponent to mitigate.¹⁷

Therefore, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or

¹⁶ *City of Los Angeles, Budget for the Fiscal Year 2019–20.*

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

physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Accordingly, the Project's impact with regard to police protection would be less than significant

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2024 (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 44 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 44 is a conservative assumption, as some of the related projects may not be built out by 2024, 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 44 are fully built out by 2024, unless otherwise noted. Of the 44 related projects, 17 are located in the City of Los Angeles. All 17 of the City of Los Angeles related projects fall within the boundaries of the Wilshire Division and are served by the Wilshire Community Police Station, and of those, 13 related projects include residential uses. Related projects within the City of Beverly Hills are served by the Beverly Hills Police Department and related projects within the City of West Hollywood are served by the Los Angeles County Sheriff's Department.

(a) Construction

In general, impacts to LAPD 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 during construction. Furthermore, the Project vicinity and general Wilshire Area are highly urbanized and it is assumed that each of the related projects identified, as well as other future development within the Wilshire Division, would likewise be currently serviced by existing police stations. Therefore, construction of the Project and related projects do not propose to introduce new populations into currently underserved areas necessitating a new facility.

Due to these factors, the Project's contribution to the cumulative police protection service impact during construction would not be cumulatively considerable and cumulative construction impacts on police protection facilities would be less than significant.

(b) Operation

As shown in Table IV.H.2-4 on page IV.H.2-20, based on the police service population conversion factors provided in the *L.A. CEQA Thresholds Guide*, the residential component of related projects that fall within the boundaries of the Wilshire Division and that would be served by the Wilshire Community Police Station would generate approximately 4,275 residents, plus the Project's 459 residents, for a total estimated service population increase of 5,294 residents in the Wilshire Division.¹⁸ It is noted that the estimated number of residents associated with related projects are conservative because the 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. Notwithstanding, when considering these estimates, the Wilshire Division's police service population would increase from 249,200 to 254,494 residents, which would in turn decrease the officer-to-resident ratio for the Wilshire Area from the current ratio of 1.072 officers per 1,000 residents to 1.049 officer 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 Wilshire Division, which could increase based on per capita crime rates. As shown in Table IV.H.2-4, assuming the same crime per capita rate currently observed in the Wilshire Division (0.0253 crime per capita), the residential population of the Project and related projects could generate an additional 144 crimes per year. Of the 144 crimes per year, the Project's incremental contribution is only 12 crimes per year, or approximately 8.3 percent of the cumulative increase in crimes.

¹⁸ *The population estimates presented herein are based on the Service Population Conversion Factors provided in the L.A. City CEQA Thresholds Guide for purposes of evaluating impacts on LAPD services. These estimates may not accurately reflect each related project's anticipated demographics.*

Table IV.H.2-4
Estimated Residential Service Population from Related Projects within Wilshire Area

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Conversion Factor	Service Population	Crimes ^c
LA1	Four Seasons Residences 300 S. Wetherly Dr.	Condominiums	140 du	4	560	15
LA3	1022 S. La Cienega Boulevard Eldercare Facility 1022 S. La Cienega Blvd.	Assisted Living	183 beds	— ^d	183	5
		Skilled Nursing	22 du	4	88	3
LA4	6535 Wilshire Boulevard Mixed-Use Project 6535 Wilshire Blvd.	Apartments	22 du	4	88	3
LA5	Beverly & Fairfax Mixed-Use Project 7901 W. Beverly Blvd.	Apartments	71 du	4	284	8
LA6	333 La Cienega Boulevard Project 333 S. La Cienega Blvd.	Apartments	145 du	4	580	15
LA8	Unified Elder Care Facility/Mixed-Use 8052 W. Beverly Blvd.	Apartments	102 du	4	408	11
LA9	8000 W. Beverly Boulevard Mixed-Use Project 8000 W. Beverly Blvd	Apartments	48 du	4	192	5
LA11	488 S. San Vicente Boulevard Mixed-Use Project 488 S. San Vicente Blvd.	Apartments	53 du	4	212	6
LA12	Solstice 431 N. La Cienega Blvd.	Apartments	72 du	4	288	8
LA13	Third Street Mixed-Use Project 8000 W. 3rd St.	Apartments/ Affordable Housing	50 du	4	200	6
LA14	7951 W. Beverly Boulevard Mixed-Use Project 7951 W. Beverly Blvd.	Apartments/ Affordable Housing	57 du	4	228	7
LA15	316 N. La Cienega Boulevard Mixed-Use Project 316 N. La Cienega Blvd.	Apartments/ Affordable Housing	50 du	4	200	6
LA16	3rd and Fairfax 300-370 S. Fairfax Ave., 6300-6370 W. 3rd St., and 347 S. Ogden Dr.	Apartments	331 du	4	1,324	34
Related Projects Residential Service Population					4,835	132
Project Residential Service Population					459	12
Total Residential Service Population for Related Projects and Project					5,294	144

du = dwelling units

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, to this Draft EIR. Related Projects Nos. LA2, LA7, LA10, and LA17 do not include residential uses.*

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

Table IV.H.2-4 (Continued)
Estimated Residential Service Population from Related Projects within Wilshire Area

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Conversion Factor	Service Population	Crimes ^c
^c The number of crimes is based on the rate of 0.0253 crime per capita currently observed in the Wilshire Community Police Station service area.						
^d The L.A. CEQA Thresholds Guide does not provide a police service population factor per bed. Therefore, the police service population is assumed to be equivalent to the number of beds.						
Source: Eyestone Environmental, 2021.						

Accordingly, cumulative population growth could increase the demand for LAPD services in the Wilshire Division. Written correspondence from LAPD recognizes that there would be growth in the area, and indicated that the Project could have only a minor impact on police services in the Wilshire Division. The ratio change of 0.02315 officers per 1,000 residents as well as the Project's incremental contribution in crimes would present a minimal and imperceptible change from existing conditions in the Wilshire Division. Thus, the minor impact would be further reduced by the Project Design Features implemented as part of the Project and the Project's contribution to the General Fund. As such, the Project would not generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site.

Furthermore, the Project vicinity and general Wilshire Division are highly urbanized and it is assumed that each of the related projects identified, as well as other future development within the Wilshire Area would likewise be currently serviced by existing police stations. Therefore, the Project and related projects do not propose to introduce new populations into currently underserved areas necessitating a new facility. 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 implement project design features similar to the Project, which would reduce cumulative demand for police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the

¹⁹ City of Los Angeles, *Budget for the Fiscal Year 2019–20*.

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 Wilshire Division, 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.

Additionally, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection 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 Section 15301 or 15332, Negative Declaration, or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document.

Based on the above, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical 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. As such, Project's contribution to impacts on police protection facilities would not be cumulatively considerable and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to police protection facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to police protection facilities 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.