

IV. Environmental Impact Analysis

J.2 Public Services—Police Protection

1. Introduction

This section of the Draft EIR analyzes whether new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated August 31, 2020, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix N of this Draft Environmental Impact Report (EIR). Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

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

- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management
- City of Los Angeles General Plan, including
 - Framework Element
 - Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- LAPD COMPSTAT Program

- LAPD Guidelines and Review

(1) State

(a) California Vehicle Code

Section 21806 of the California Vehicle Code (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 (Framework Element), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the City and guides subsequent amendments of the City's Community Plans Specific Plans, zoning ordinances, and other local planning programs.

Chapter 9 of the Framework Element addresses Infrastructure and Public Services. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard. The relevant General Plan police protection goals, objectives, and policies are included in Table IV.H.2-1 on page IV.J.2-4.

(ii) 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/> <p><i>Source: City of Los Angeles 2001.</i></p>	

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 Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project Site is located within the North Hollywood–Valley Village Community Plan (Community Plan) area.^{2,3} The Community Plan, adopted on May 14, 1996, does not contain any objectives or policies

² *City of Los Angeles, Department of City Planning, Zone Information Map Access System, 5311 N. Lankershim Blvd., October 2, 2020.*

³ *The Los Angeles Department of City Planning is currently preparing the Southeast Valley Community Plan Update, which includes the North Hollywood–Valley Village Community Plan area (see <https://planning.lacity.org/plans-policies/community-plan-update/southeast-valley-community-plan-update>). As of February 2022, a draft of the revised community plan has not been released. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Community Plan.*

specifically related to police protection services. It does, however, contain the following objectives and policies related to the provision of adequate public services and facilities to serve the Community Plan area:⁴

- To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected in the year 2010.
- To provide a basis for the location and programming of public facilities services and utilities and to coordinate the phasing of public facilities with private development.
- The Plan stresses the need for the improvement of existing public facilities and the provision of additional facilities to satisfy the needs of both the present and projected populations.
- The development of other public facilities should be sequenced and timed to provide a balance between land use and public services at all times.

(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.

⁴ North Hollywood–Valley Village Community Plan, adopted May 14, 1996.

(d) *LAPD COMPSTAT Program*

The LAPD COMPSTAT program was created in 1994 and implements the Framework Element's 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.⁵

(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;

⁵ LAPD, *COMPSTAT*, www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed January 25, 2021.

- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

(f) Metro’s Guide for Development at the North Hollywood Station

The Los Angeles County Metropolitan Transportation Authority (Metro) has developed the December 2015 Guide for Development at the North Hollywood Station to communicate Metro and community stakeholders’ desires for the joint development of Metro-owned property at the North Hollywood Metro Station. The Guide summarizes specific policies that apply to the Project Site and defines objectives that were developed from existing land use regulations and a public outreach process conducted in fall 2015 and will be a basis for evaluating proposals. Listed below are the safety and security policies and requirements in the Guide applicable to the Project Site.

- Stakeholder Feedback: Promote safety and security around the station.
- Measures to Promote Safety and Security: To address security, the development should:
 - Include lighting, pedestrian signals, protected crossings, protected bike lanes and design strategies that enhance pedestrian safety.
 - Use environmental design for crime prevention whenever possible, including security cameras at the development and Metro station area.
 - Prioritize safety for a family friendly environment.
 - Ensure safety and security in parking facilities.
- Safety and Security Plan: The selected developer will be required to craft a Safety and Security Plan for the project during the Joint Development Agreement Phase, once project design has progressed.

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: Central Bureau; West Bureau; South Bureau; and Valley

Bureau.⁶ These four bureaus are further divided into 21 community areas which are serviced by LAPD's 21 community police stations.⁷ Each bureau is comprised of four to six community areas/police stations.⁸

As of December 2021, the LAPD had 9,521 sworn officers serving a population of 4,015,546 residents.⁹ Based on these numbers, LAPD has a current officer-to-resident population ratio of approximately 2.37 officers per 1,000 residents.

The Project Site is located within the LAPD's Valley Bureau which covers an area of approximately 226 square miles with a population of approximately 1,426,071 residents.¹⁰ The Valley Bureau oversees operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley service areas.¹¹

(2) LAPD Community Police Station

Within the Valley Bureau, the Project Site is located within LAPD's North Hollywood Division and is served by the North Hollywood Community Police Station located at 1640 Burbank Boulevard in North Hollywood. The location of the North Hollywood Community Police Station relative the Project Site and Off-Site Metro Parking Areas is shown on Figure IV.J.2-1 on page IV.J.2-9. The North Hollywood Community Police Station is located approximately 0.4 mile to 1.0 mile northwest of the Project Site (depending on the portion of the Project Site and Off-Site Metro Parking Areas measured from), existing response times from this station to the Project Site range from two to four minutes based on distance.¹² The average response time for service in the North Hollywood Division of 4.4 minutes for emergency calls and 33 minutes for low-priority calls.¹³

⁶ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed October 2, 2020.

⁷ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed October 2, 2020.

⁸ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed October 2, 2020.

⁹ LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 11/28/21 to 12/25/21*.

¹⁰ LAPD, *About Valley Bureau*, www.lapdonline.org/valley_bureau/content_basic_view/1921, accessed October 2, 2020.

¹¹ LAPD, *About Valley Bureau*, www.lapdonline.org/valley_bureau/content_basic_view/1921, accessed October 2, 2020.

¹² *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. Included as Appendix N of this Draft EIR.*

¹³ *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. See Appendix N of this Draft EIR.*

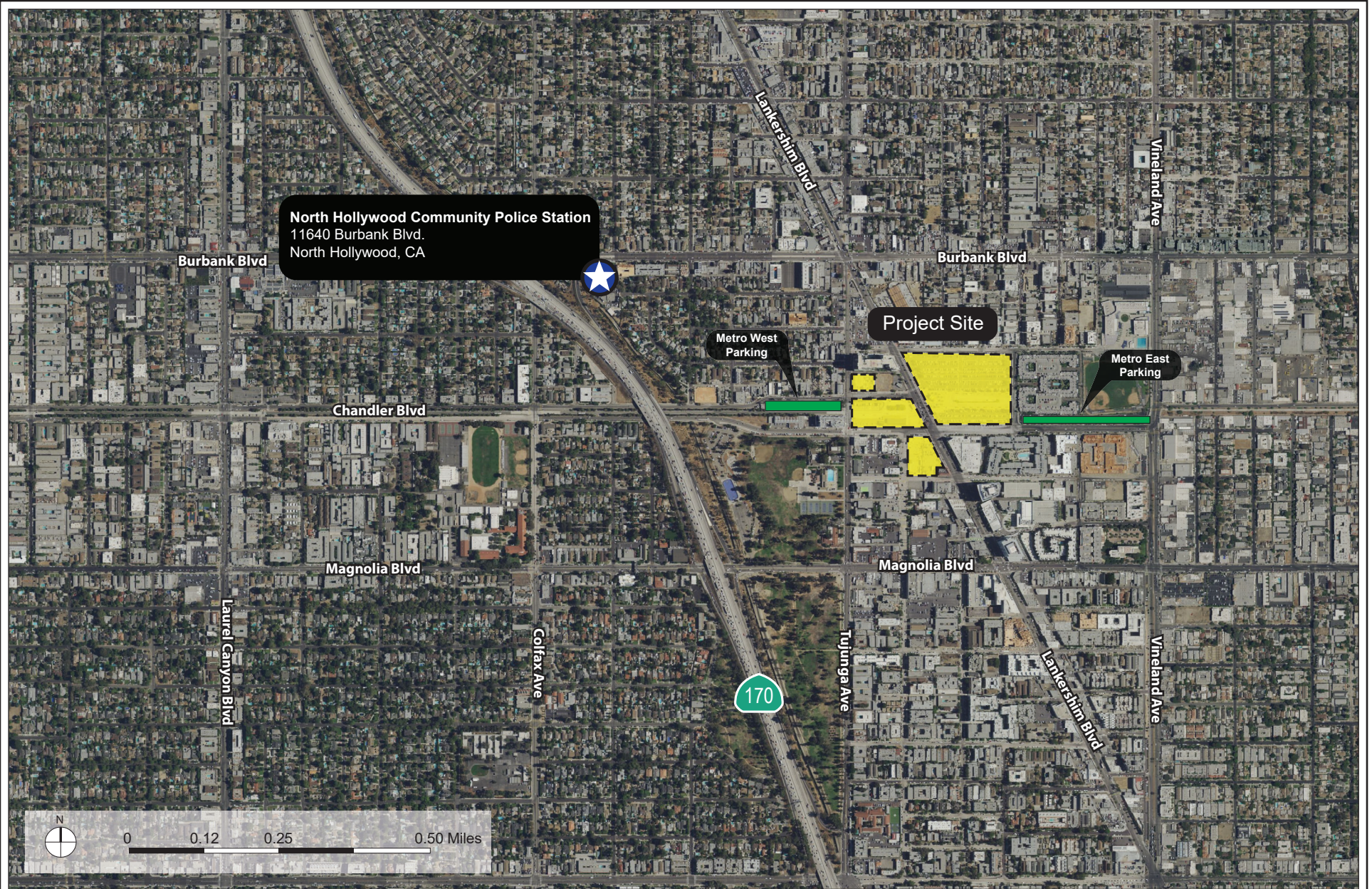


Figure IV.J.2-1
Police Station Serving the Project Site

The North Hollywood Community Police Station has a service area of approximately 25 square miles and serves the neighborhoods of Cahuenga Pass, North Hollywood, Studio City, Sun Valley, Toluca Lake, Toluca Woods, Universal City, Valley Glen, Valley Village, West Toluca.¹⁴ This station is staffed by approximately 279 sworn officers and 15 civilian support staff.¹⁵ Based on data from LAPD Community Outreach and Development Division, the service population of the North Hollywood Division is approximately 220,000 residents, and the officer-to-population ratio is approximately 1.27 officers per 1,000 residents. As such, the officer-to-population ratio in the North Hollywood Area is lower than the citywide ratio of approximately 2.37 officers per 1,000 residents.

In addition to the sworn officers and civilian support staff stationed at the North Hollywood Community Police Station, this station has available to it LAPD Air Support, Detectives, K9, and Metro to support its policing needs. Lastly, the LAPD has indicated that no improvements to police protection facilities are currently planned within the North Hollywood Division.¹⁶

(3) LAPD Crime Statistics

Table IV.J.2-1 on page IV.J.2-11 provides a comparison of the North Hollywood Community Police Station service area and citywide data regarding crimes as reported by the LAPD based on only residential populations. As shown therein, based on the most recent full year (e.g., 2021) COMPSTAT data, 6,225 crimes were reported within the North Hollywood Community Police Station service area and 117,702 crimes were reported citywide. Based on the residential service population of the North Hollywood Community Police Station, approximately 28.3 crimes per 1,000 residents¹⁷ (0.028 crime per capita)¹⁸ were reported in the North Hollywood Community Police Station service area and 29.3 crimes per 1,000 residents¹⁹ (0.029 crime per capita)²⁰ were experienced citywide.

¹⁴ LAPD, *North Valley Community Police Station*, www.lapdonline.org/north_hollywood_community_police_station, accessed October 4, 2020.

¹⁵ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. Included as Appendix N of this Draft EIR.

¹⁶ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. See Appendix N of this Draft EIR.

¹⁷ $6,225 \text{ crimes} / 220,000 \text{ residents} \times 1,000 = 28.3 \text{ crimes per } 1,000 \text{ residents}$.

¹⁸ $6,225 \text{ crimes} / 220,000 \text{ residents} = 0.028 \text{ crime per capita}$.

¹⁹ $117,702 \text{ crimes} / 4,015,546 \text{ residents} \times 1,000 = 29.3 \text{ crimes per } 1,000 \text{ residents}$.

²⁰ $117,702 \text{ crimes} / 4,015,546 \text{ residents} = 0.029 \text{ crime per capita}$.

**Table IV.J.2-1
2021 Part I Crimes—North Hollywood Area and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
North Hollywood Division	6,225	220,000	28.3	0.028
Citywide	117,702	4,015,546	29.3	0.029

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

Based on the number of sworn officers staffing the North Hollywood Community Police Station (279 sworn officers), the 2021 ratio of crimes per officer was 22.3 crimes per officer.²¹ In comparison, the citywide (9,521 sworn officers) ratio is 12.4 crimes per officer.²² As such, the North Hollywood Division has a higher crime per officer ratio than the City as a whole. This information is presented for informational purposes only.

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a 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 in this section, the City uses Appendix G as the thresholds of significance. The factors identified below from the L.A. CEQA Thresholds Guide are used, where applicable and relevant, to assist in analyzing the CEQA Guidelines Appendix G thresholds. The L.A. CEQA Thresholds Guide considers the following factors to evaluate police protection:

²¹ 6,225 crimes/279 sworn officers = 25.3 crimes per officer.

²² 117,702 crimes/9,521 sworn officers = 12.4 crimes per officer.

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

b. Methodology

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, the need for new or physically altered government facilities. As such, the determination of significance relative to impacts on police protection services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population.

The analysis herein presents statistical averages associated with the police station serving the Project Site and citywide police protection services from both the LAPD's website and the LAPD correspondence on the Project included as Appendix N of this Draft EIR. While the LAPD bases its officer-to-population ratio and crime statistics on the residential population,²³ the analysis in this section addresses the impacts of both the Project's and related projects' total (e.g., residential and employee) populations to provide a conservative analysis. Furthermore, the determination of the impact on the capability of existing police services and personnel is based, in part, on the potential for the annual crimes per resident in the North Hollywood Division to exceed current averages due to the addition of the Project.

c. Project Design Features

The following Project Design Features (PDFs) are proposed to increase Project Site security and minimize the Project's demand for police protection services:

²³ *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. Included as Appendix N of this Draft EIR.*

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

Project Design Feature POL-PDF-2: The Project will include a standard range of security measures recommended in LAPD’s Design Out Crime Guidelines including, but not limited to, providing adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment; provide lighting of building entries, pedestrian walkways, and other public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings; design public spaces to be easily patrolled and accessed by safety personnel; design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and limit visually obstructed and infrequently accessed “dead zones.”

Project Design Feature POL-PDF-3: Upon completion of construction 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 North Hollywood Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

Project Design Feature POL-PDF-4: In accordance with Metro’s Guide for Development at the North Hollywood Station, the Applicant will prepare a Safety and Security Plan for the Project prior to execution of the agreement between the Applicant and Metro governing the joint development of the Project Site and execution of the associated ground lease.

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

Project construction activities would include a temporary on-site construction worker population that could generate some daytime demand for police protection services. In addition, the Project construction sites could invite theft and vandalism during the

construction period which could generate a demand for police protection services. However, the small temporary demand for police protection services associated with Project construction activities would be partially to fully offset by the removal of the 49,111 square feet of existing industrial/warehouse uses which currently generate a demand for police protection.²⁴ Furthermore, 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 construction sites during the construction period. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be minimized. Lastly, Project construction activities would be temporary. Therefore, Project construction activities would not result in a substantial increase in the demand for police protection services and facilities.

Project construction activities could also potentially impact LAPD police protection response (e.g., police response times and emergency access) within the North Hollywood Area due to construction impacts on the surrounding roadways. As discussed in Section IV.K, Transportation, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, reducing the potential for traffic-related conflicts. In addition, pursuant to Project Design Feature TR-PDF-1 in Section IV.K, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during construction to: (1) minimize Project construction traffic impacts and thus impacts to police emergency response times during the construction period by safely routing vehicular traffic around any temporary street closures; and (2) ensure that adequate and safe emergency access is available within and near the Project Site during construction activities by requiring that emergency access be maintained, prohibiting construction worker parking on area streets, and coordinating with the City and emergency service providers during the construction period. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

²⁴ On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

Based on above, Project construction activities would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. As such, Project construction-related police protection impacts would be less than significant.

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project would include the demolition of 49,111 square feet of existing industrial/warehouse uses, and the development of 103,400 square feet of retail/restaurant uses, 1,527 multi-family residential units, and 580,374 square feet of office uses. Alternatively, the Project includes a potential land use exchange of up to 75,000 square feet of retail/restaurant uses for up to 75,000 square feet of office space should future market conditions warrant. This would result in a net increase in the service population requiring police protection services from the LAPD.

As discussed above, the Project Site is served by the North Hollywood Community Police Station located at 1640 Burbank Boulevard in North Hollywood, approximately 0.4 mile and 1.0 mile from the Project Site and Off-Site Metro Parking Areas. The North Hollywood Community Police Station is currently staffed by 279 sworn officers and 15 civilian support staff. As shown in Table IV.J.2-2 on page IV.J.2-16, the Project's estimated net increase in the police service population would be 6,562 persons, including both residents and employees.^{25,26} This would increase the service population within in the North Hollywood Division from approximately 220,000 persons to approximately 226,562 persons, and would decrease the existing officer-to-resident population ratio within the North Hollywood Area from 1.27²⁷ to 1.23²⁸ officers per 1,000 residents, a net decrease of approximately 3.3 percent.²⁹ Therefore, the Project would not cause a significant change to the officer-per-resident population ratio within the North Hollywood Division.

²⁵ As indicated previously, although the LAPD considers only the residential service population when calculating service ratios, this analysis considers both the Project's residential and non-residential daytime population in order to provide a conservative analysis.

²⁶ The proposed land use exchange would result in a net increase in police service population of 6,443 persons including both residents and employees.

²⁷ $279 \text{ officers} \div 220,000 \text{ residents} = 1.27 \text{ officers}/1,000 \text{ residents}$

²⁸ $279 \text{ officers} \div 226,562 \text{ residents} = 1.23 \text{ officers}/1,000 \text{ residents}$

²⁹ $1.27 \div 1.23 = 3.3\%$

**Table IV.J.2-2
Estimated Project Service Population**

Land Use	Units	Conversion Factor ^a	Total Police Service Population ^b
Existing to be Removed			
Industrial/Warehouse ^c	49,111 sf	1.0/ksf	49
<i>Total Existing</i>			<i>49 Total</i>
Existing to Remain			
Retail/Restaurant	1,725 sf	6.7/ksf	12
<i>Total Existing</i>			<i>12 Total</i>
Proposed at Buildout			
Retail	28,400 sf	2.0/ksf	57
Restaurant	75,000 sf	6.7/ksf	503
Multi-Family Residential	1,216 du	2.25/du ^d	2,740 ^d
Affordable Housing—Family	311	3.14/du	977
Office	580,374 sf	4.0/ksf	2,322
<i>Total Proposed</i>			<i>6,611 Total</i>
Project Net Police Service Population (Proposed – Existing to be Removed)^b			6,562 Total^d

du = dwelling units

ksf = thousand square feet

sf = square feet

Totals may not sum due to rounding.

^a The Department of City Planning no longer uses the police service population factors in the L.A. CEQA Thresholds Guide. Factors from the LADOT VMT Calculator are now used (City of Los Angeles VMT Calculator Documentation Version 1.3). For employees, the following employee generation rates were used: Warehousing/Self-Storage 1.0/ksf; Retail 2.0/ksf; Fast Food Restaurant 6.7/ksf; and General Office 4.0/ksf. For residents, the following resident generation rates were used: Multi-Family Residential 2.25/du and Affordable Housing—Family 3.14/du.

^b While the LAPD bases its officer-to-population ratio and crime statistics on the residential population, the estimates in this table include both the Project's residential and employee populations to provide a conservative analysis.

^c On December 21, 2020, a fire destroyed the existing building on Block 7. Nevertheless, because it was present at the time the NOP was published on July 7, 2020, it is considered part of the existing conditions.

^d Although the VMT Calculator Documentation Version 1.3 lists 2.25 residents per dwelling unit as the population factor for Multi-Family Residential, the VMT Calculator itself uses a factor of 2.2533455879541 residents per dwelling unit. To provide a conservative analysis, the higher rate was used.

^e The proposed land use exchange would result in a net increase in police service population of 6,443 persons including both residents and employees.

Source: Eyestone Environmental, February 2022.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-4, the Project would include several operational project design features to enhance safety within and immediately surrounding the Project Site and Off-Site Metro Parking Areas. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project will include a standard range of security measures recommended in LAPD's Design Out Crime Guidelines including, but not limited to, providing adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment; provide lighting of building entries, pedestrian walkways, and other public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings; design public spaces to be easily patrolled and accessed by safety personnel; design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and limit visually obstructed and infrequently accessed "dead zones". As specified in Project Design Features POL-PDF-3, the Applicant would submit a diagram of the Project Site to the LAPD showing access routes and other information that might facilitate police response. Furthermore, as provided in Project Design Feature POL-PDF-4, in accordance with Metro's Guide for Development at the North Hollywood Station, the Applicant would prepare a Safety and Security Plan for the Project prior to execution of the agreement between the Applicant and Metro governing the joint development of the Project Site and execution of the associated ground lease. The above would help offset the Project-related increase in demand for police services and minimize the need for new or altered facilities. The Project would also 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.

LAPD also makes the following conclusions in its August 31, 2020, correspondence regarding the police protection impacts of the Project:³⁰

A project of this size could have a minor impact on police services within the North Hollywood Division's Community area.

In using these available resources [referring to the specialized support units available to the North Hollywood Division including Air Support, Detectives, K9 and Metro], the Los Angeles Police Department can meet the demands for police services for the District NoHo Project.

At this time, there are no special police protection requirements needed, because of the specific attributes of this project site.

³⁰ *Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. Included as Appendix N of this Draft EIR.*

The District NoHo Project, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities.

With regard to Project operational impacts on police emergency response times, the Project would introduce new uses to the Project Site which would generate additional operational traffic in the Project vicinity. Project-related traffic would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial delay in emergency response to the Project area due to traffic congestion. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Furthermore, the Project Site and Off-Site Metro Parking Areas are located only between 0.4 mile and 1.0 mile from the North Hollywood Community Police Station, with existing LAPD emergency response times to the Project Site at approximately two to four minutes, which is below the existing average within the North Hollywood Division of approximately 4.4 minutes. Therefore, Project operation would not result in substantial slowing of police emergency response times, and existing police emergency response times to and around the Project Site would continue to be adequate under the Project.

As noted above, in its August 31, 2020, letter, LAPD concluded that “[t]he District NoHo Project, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities. Moreover, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on above, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

As such, Project operational police protection impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2037 (the buildout year of the Project) includes specific known development projects. As identified in Section III, Environmental Setting, of this Draft EIR, a total of 34 related projects are located in the vicinity of the Project Site. All of these related Projects are located within LAPD's North Hollywood Division. The projected growth reflected by the related projects is a conservative assumption as some of the related projects may not be built out by 2037, may never be built, or may be approved and built at reduced densities. Furthermore, the projected growth does not take into account any existing development (and associated police service demand) that would be removed under the related projects.

(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 the related projects in the immediate proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan (Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR) 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 implement similar design features during construction and would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented. Furthermore, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within

the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Finally, the Project in and of itself would not cause a significant impact to police protection services and facilities during construction. **Therefore, the Project’s contribution to cumulative impacts on police protection during construction would not be cumulatively considerable, and cumulative police protection impacts would be less than significant.**

(b) Operation

As shown in Table IV.J.2-3 on page IV.J.2-21, it is estimated that the LAPD service population of the related projects would be 5,235 persons (including both residents and employees). As described above, the Project would contribute to this cumulative increase by generating a net Project service population (both residents and employees) of an estimated 6,562 persons.³¹ Together, the Project and the related projects would generate a cumulative service population of an estimated 11,797 persons that would increase the LAPD service population within the North Hollywood Division from the current 220,000 to 231,797 persons. This would decrease the officer-to-resident ratio in the North Hollywood Division from the current 1.27 officers per 1,000 residents³² to an estimated 1.20 officers per 1,000 residents.³³

While the Project and the related projects would increase the demand for LAPD services and facilities, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-4, which together would minimize Project demand for LAPD services/facilities and avoid exceedance of the LAPD’s capacity to serve the Project. Also, similar to the Project, each related project would be subject to the City’s routine construction permitting process, which includes review by the LAPD to ensure sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the City’s Framework Element, 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. Furthermore, the Project and the related projects would generate revenues to the City’s General Fund in the

³¹ *The proposed land use exchange would result in a net increase in police service population of 6,443 persons including both residents and employees.*

³² *279 officers ÷ 220k residents = 1.27 officers/1,000 residents*

³³ *279 officers ÷ 231.797k residents = 1.20 officers/1,000 residents*

Table IV.J.2-3
Estimated Service Population from Related Projects within North Hollywood Division

No.	Project	Land Use	Size	Conversion Factor ^a	Estimated Service Population ^b
1	NoHo Lankershim Station 5401 Lankershim Blvd.	Apartments	127 du	2.25/du	286
		Retail	14,500 sf	2.0/ksf	29
		Office	1,918 sf	4.0/ksf	8
2	New NoHo Artwalk Project 11126 Chandler Blvd.	Apartments	73 du	2.25/du	164
		Retail	2,900 sf	2.0/ksf	6
3	The Weddington 11120 Chandler Blvd.	Apartments	324 du	2.25/du	729
4	Apartments 5508 Fulcher Ave.	Apartments	46 du	2.25/du	104
5	Apartments 5513 Case Ave.	Apartments	90 du	2.25/du	203
6	Apartments 11112 Burbank Blvd.	Apartments	12 du	2.25/du	27
7	Apartments 11422 Albers St.	Apartments	79 du	2.25/du	178
8	Mixed-Use 5553 N. Tujunga Ave.	Apartments	30 du	2.25/du	68
		Retail	4,970 sf	2.0/ksf	10
		Office	2,962 sf	4.0/ksf	12
9	Apartments 11410 W. Burbank Blvd.	Apartments	84 du	2.25/du	189
10	Mixed-Use 5444 N. Vineland Avenue	Self-Storage	96,444 sf	0.33/ksf	32
		Office	10,000 sf	4.0/ksf	40
11	Fitness Studio 5200 N. Lankershim Boulevard	Health/Fitness Club	2,690 sf	1.0/ksf	3
12	Condominium 11525 Chandler Blvd.	Condominiums	60 du	2.25/du	135
13	Apartments 5633 Farmdale Ave.	Apartments	26 du	2.25/du	59
14	Camelia Court Apartments 5610 Camelia Ave.	Apartments	62 du	2.25/du	140
15	Self Storage 5260 N. Vineland Avenue	Self-storage	81,300 sf	0.33/ksf	27
16	Apartments 5147 Bakman Ave.	Apartments	33 du	2.25/du	74
17	Apartments 5110 Bakman Ave.	Apartments	51 du	2.25/du	115
18	Apartments 11246 W. Ostego St.	Apartments	70 du	2.25/du	158
19	NoHo Millennium 5107 Lankershim Blvd.	Apartments	287 du	2.25/du	646
		Market	23,733 sf	4.0/ksf	95
		Office	1,267 sf	4.0/ksf	5

Table IV.J.2-3 (Continued)
Estimated Service Population from Related Projects within North Hollywood

No.	Project	Land Use	Size	Conversion Factor^a	Estimated Service Population^b
20	Apartments 11106 Hartsook St.	Apartments	61 du	2.25/du	137
21	Apartments 11029–11035 Hartsook St.	Apartments	53 du	2.25/du	119
22	Apartments 5050 N. Bakman Ave.	Apartments	40 du	2.25/du	90
23	Mixed-Use 10821 Magnolia Blvd.	Retail	4,075 sf	2.0/ksf	8
		Apartments	40 du	2.25/du	90
24	School 11600 Magnolia Boulevard	Additional students	78 stu	0.15/stu	12
25	Apartments 5755 N. Tujunga Ave.	Apartments	33 du	2.25/du	74
26	Apartments 11155 W. Huston St.	Apartments	24 du	2.25/du	54
27	Wesley School 4832 Tujunga Avenue	Additional Students	78 stu	0.15/stu	12
28	Apartments 11433 Riverside Dr.	Apartments	29 du	2.25/du	65
29	Mixed-Use 11311 Camarillo St.	Apartments	60 du	2.25/du	135
		Retail	3,000 sf	2.0/ksf	6
30	Apartments 10804 W. Blix St.	Apartments	21 du	2.25/du	47
31	Mixed-Use 10850 Riverside Dr.	Apartments	179 du	2.25/du	403
		Retail	5,694 sf	2.0/ksf	11
32	Cohen Apartments 10601 Riverside Dr.	Apartments	82 du	2.25/du	185
		Retail	13,327 sf	2.0/ksf	27
33	Apartments 11036 Moorpark St.	Apartments	96 du	2.25/du	216
34	Gas Station 4377 Vineland Avenue	Expansion of Existing Facilities	1,818 sf	1.0/ksf	2
Total – Related Projects					5,235
Total Net – Project (with land use exchange)					6,562^c
Total – Project + Related Projects					11,797
<p><i>du = dwelling units</i> <i>ksf = thousand square feet</i> <i>sf = square feet</i> <i>stu = students</i></p> <p>^a <i>The following LADOT VMT Calculator employee generation factors were used: Retail 2.0/ksf; Office</i></p>					

Table IV.J.2-3 (Continued)
Estimated Service Population from Related Projects within North Hollywood

No.	Project	Land Use	Size	Conversion Factor ^a	Estimated Service Population ^b
<p>4.0/ksf; Warehousing/Self-Storage 0.33/ksf; Health Club 1.0/ksf; Supermarket 4.0/ksf; Private School (K-12) 0.15/stu; Auto Repair 1.0/ksf; and Multi-Family Residential 2.25/unit.</p>					
<p>^b While the LAPD bases its officer-to-population ratio and crime statistics on the residential population, the estimates in this table include both the Project's and related projects' residential and employee populations to provide a conservative analysis.</p>					
<p>^c The proposed land use exchange would result in a net increase in police service population of 6,443 persons including both residents and employees.</p>					
<p>Source: Eyestone Environmental, February 2022.</p>					

form of property taxes, sales revenue, etc., that could be applied by the City toward the provision of new/expanded LAPD facilities and staffing. LAPD also concluded that the “District NoHo Project, individually or combined with other past, present, or future projects, will not result in the need for new or altered police facilities.”³⁴

Lastly, 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.³⁵ Through the City’s regular budgeting efforts, LAPD’s resource needs, including staffing, equipment, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would be developed where permitted under the designated land use; (2) would likely be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would likely qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration. Also, because the location and nature of any future new or expanded police protection facilities would be speculative, as would the associated environmental effects, the potential environmental effects associated with any such new or expanded police protection facilities would be speculative and beyond the scope of this draft EIR.

³⁴ Written correspondence from Aaron C. Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, August 31, 2020. Included as Appendix N of this Draft EIR.

³⁵ (2015) 242 Cal.App.4th 833.

Based on the above, the Project's contribution to cumulative operational impacts to police protection services would not be cumulatively considerable. The Project would not result in cumulative adverse impacts associated with the provision of new or physically altered government facilities (i.e., police), the construction of which would cause significant environmental impacts, in order to maintain service. As such, cumulative police protection services impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts with regard 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 would be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.