

# **IV. Environmental Impact Analysis**

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## **G.2 Public Services—Police Protection**

### **1. Introduction**

This section 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) on December 17, 2020, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix I of this Draft EIR. Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

### **2. Environmental Setting**

#### **a. Regulatory Framework**

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

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

## (1) State

### (a) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.<sup>1</sup> 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 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

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<sup>1</sup> 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.

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.G.2-1 on page IV.G.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 establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans

**Table IV.G.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 General Plan, Framework Element, re-adopted 2001.</i>	

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

As discussed in Section IV.E, Land Use, of this Draft EIR, the Project is located within the Hollywood Community Plan area.<sup>2</sup> The Hollywood Community Plan, adopted on December 13, 1988, does not include any objectives or policies that specifically relate to

<sup>2</sup> *The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in February 2021 and is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>. The City Planning Commission recommended approval of the draft Plan on March 18, 2021, the Department of City Planning released the letter of determination on August 18, 2021, and the draft plan is currently awaiting consideration by the City's Planning and Land Use Management committee.*

police protection. However, there is general public facilities language under Programs, Public Improvements, Section 3, that states the development of other public facilities such as fire stations, libraries, and schools 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 with regard to new development.

*(d) LAPD COMPSTAT Program*

The LAPD COMPSTAT was created in 1994 and implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.<sup>3</sup>

*(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

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<sup>3</sup> LAPD, COMPSTAT, [www.lapdonline.org/crime\\_mapping\\_and\\_compstat/content\\_basic\\_view/6363](http://www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363), accessed January 25, 2021.

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;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."

## **b. Existing Conditions**

### **(1) LAPD Service Area and Bureaus**

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley Bureau.<sup>4</sup> These four geographic bureaus are further divided into 21 geographic areas,

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<sup>4</sup> LAPD, *COMPSTAT Plus*, [www.lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/6364](http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364), accessed January 25, 2021.

which are serviced by the LAPD's 21 community police stations.<sup>5</sup> Each geographic bureau is comprised of four to five geographic area police stations.<sup>6</sup>

As of December 2020, the departmental staffing resources within the LAPD included 9,854 sworn officers.<sup>7</sup> Based on a total City population of 4,015,940, the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.<sup>8</sup>

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.<sup>9</sup> The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles Divisions.<sup>10</sup> 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.<sup>11</sup> Within the West Bureau, the Project Site is located within the Hollywood Division.

## (2) LAPD Community Police Station

Within the Hollywood Division, the Project Site is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.6 mile northeast of the Project Site.<sup>12</sup> The location of the police station that serves the Project Site is depicted in Figure IV.G.2-1 on page IV.G.2-8. The Hollywood Community Police Station has a service area of approximately 13.34 square miles and consists of 35 reporting districts.<sup>13</sup> The Project Site is located within reporting district 0656, which

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<sup>5</sup> LAPD, *Community Police Station Address Directory*, [www.lapdonline.org/our\\_communities/content\\_basic\\_view/6279](http://www.lapdonline.org/our_communities/content_basic_view/6279), accessed January 25, 2021.

<sup>6</sup> LAPD, *COMPSTAT Plus*, [www.lapdonline.org/inside\\_the\\_lapd/content\\_basic\\_view/6364](http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364), accessed January 25, 2021.

<sup>7</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.

<sup>8</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.

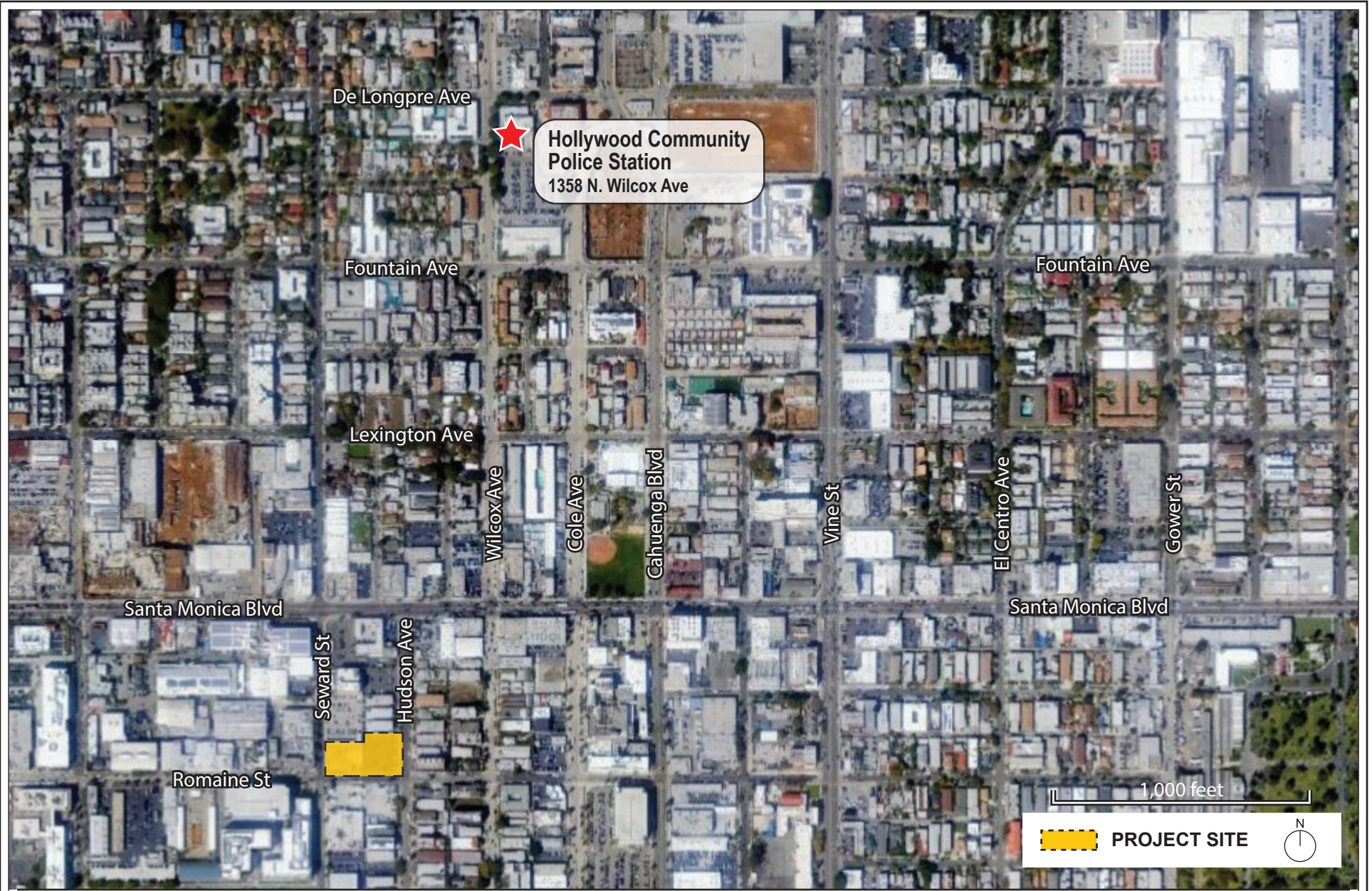
<sup>9</sup> LAPD, *About West Bureau*, [www.lapdonline.org/west\\_bureau/content\\_basic\\_view/1869](http://www.lapdonline.org/west_bureau/content_basic_view/1869), accessed January 25, 2021.

<sup>10</sup> LAPD, *About West Bureau*, [www.lapdonline.org/west\\_bureau/content\\_basic\\_view/1869](http://www.lapdonline.org/west_bureau/content_basic_view/1869), accessed January 25, 2021.

<sup>11</sup> LAPD, *About West Bureau*, [www.lapdonline.org/west\\_bureau/content\\_basic\\_view/1869](http://www.lapdonline.org/west_bureau/content_basic_view/1869), accessed January 25, 2021.

<sup>12</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.

<sup>13</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.



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



is bounded by Gower Street to the west, Santa Monica Boulevard to the north, Seward Street to the east, and Willoughby Monica to the South. As of November 2020, the average response time to emergency calls for service in the Hollywood Division was 3.6 minutes, and the average response time for non-emergency calls was 33.9 minutes.<sup>14</sup>

Based on data provided by the LAPD Community Outreach and Development Division, the Hollywood Division includes a service population of approximately 165,000 persons and is staffed by approximately 387 sworn officers and 15 civilian support staff.<sup>15</sup> As such, the Hollywood Division officer to resident ratio of approximately 2.4 officers per 1,000 residents. Thus, the officer-to-resident ratio is lower than the citywide ratio of 2.5 officers per 1,000 residents.

### (3) LAPD Crime Statistics

Table IV.G.2-2 on page IV.G.2-10 shows a comparison of the Hollywood Division and Citywide data regarding crimes reported by the LAPD based on only residential populations. As shown therein, based on the 2019 data provided by LAPD, approximately 5,050 crimes were reported within the Hollywood Division and 123,316 crimes were reported Citywide.<sup>16</sup> Based on the residential service population of the Hollywood Community Police Station, approximately 30.61 crimes per 1,000 residents<sup>17</sup> (0.0306 crime per capita<sup>18</sup>) were reported in the Hollywood Division and 30.71 crimes per 1,000 residents<sup>19</sup> (0.0307 crime per capita<sup>20</sup>) were experienced Citywide.

Based on the number of sworn officers staffing the Hollywood Community Police Station (387 sworn officers), the 2019 ratio of crimes per officer was 13.1 crimes per officer.<sup>21</sup> In comparison, the Citywide (9,854 sworn officers) ratio is 12.5 crimes per

<sup>14</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.

<sup>15</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.

<sup>16</sup> Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.

<sup>17</sup>  $(5,050 \text{ crimes} / 165,000 \text{ residents}) \times 1,000 = 30.61 \text{ crimes per } 1,000 \text{ residents.}$

<sup>18</sup>  $5,050 \text{ crimes} / 165,000 \text{ residents} = 0.0306 \text{ crime per capita.}$

<sup>19</sup>  $(123,316 \text{ crimes} / 4,015,940 \text{ residents}) \times 1,000 = 30.71 \text{ crimes per } 1,000 \text{ residents.}$

<sup>20</sup>  $123,316 \text{ crimes} / 4,015,940 \text{ residents} = 0.0307 \text{ crime per capita.}$

<sup>21</sup>  $5,050 \text{ crimes} / 387 \text{ sworn officers} = 13.1 \text{ crimes per officer.}$

**Table IV.G.2-2  
2019 Crimes—Hollywood Division and Citywide**

	<b>Crimes<sup>a</sup></b>	<b>Population</b>	<b>Crimes per 1,000 Persons</b>	<b>Crimes per Capita</b>
Hollywood Division	5,050	165,000	30.61/1,000	0.0306
Citywide	123,316	4,015,940	30.71/1,000	0.0307

<sup>a</sup> Crime data provided by LAPD includes homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft. The statistics provided by LAPD include child/spousal abuse in the Citywide figure but not in the Hollywood Division.

Source: Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department, December 17, 2020. See Appendix I of this Draft EIR.

officer.<sup>22</sup> Thus, the Hollywood Division has a higher crime-per-officer ratio when compared to the City as a whole.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with 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, need for new or physically altered governmental facilities (i.e., police), the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.***

In assessing impacts related to police protection services in this section, the City used Appendix G as the thresholds of significance. The factors identified below from the *L.A. CEQA Thresholds Guide* were used 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:

<sup>22</sup> 123,315 crimes / 9,854 sworn officers = 12.5 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 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 on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical averages associated with the police station serving the Project Site and Citywide services and, based on guidance from the LAPD, focuses on the increase in the residential population from the Project. The determination of impacts on the capability of existing police services and personnel is based on the potential for the annual crimes per resident in the Hollywood Division to exceed current averages due to the addition of the Project.

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

There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event the City determines that expanded or new police facilities are warranted, based on previous police station improvements in the City, 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 one acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or be reviewed in a 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:** The Project will include a camera system and keycard entry for the building and parking areas.

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

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

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

**Project Design Feature POL-PDF-6:** 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 Hollywood Division 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*

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

Project construction activities could also potentially affect LAPD police protection services and response times within the Hollywood Division due to construction impacts on the surrounding roadways. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as discussed in Section IV.H, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT) and may include narrowing lanes adjacent to the Project Site and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the Project Site vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

**Based on the above analysis, construction-related impacts would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's capability to serve the Project Site; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during Project construction would be less than significant.**

*(b) Operation*

As discussed in Section II, Project Description, of this Draft EIR, the Project would develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. The Project would introduce a new employee and visitor population to the Project Site and increase the police service population of the Hollywood Division. However, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the Hollywood Division of 165,000 persons.

Nevertheless, as provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a camera system and keycard entry for the building and parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also design entrances to, and exits from the building, open spaces around the building, and pedestrian walkways to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Feature POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. The Project's design features, would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant. 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 revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features as well as the Project's contribution to the General Fund would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant.

The Project would introduce new uses to the Project Site, which would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to increase emergency vehicle response times 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 increase in emergency response times due to traffic congestion.

The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. Based on the above analysis, the Project would not generate a demand for new LAPD facilities to serve the Project Site and, therefore, LAPD concluded the Project “will not result in the need for new or altered police facilities.”<sup>23</sup> Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts.

Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. 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.

**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 physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Impacts with regard to police protection 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.

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<sup>23</sup> *Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.*

### (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

As discussed in Section III, Environmental Setting, of this Draft EIR, there are 16 specific related projects in the vicinity of the Project Site, all of which fall within the boundaries of the Hollywood Division. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. Additionally, Related Project No 17, the Hollywood Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2025, well before the Hollywood Community Plan Update's horizon year. Moreover, 2025 is a similar projected buildout year as many of the 16 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update upon its adoption.

### (1) Impact Analysis

#### *(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 related projects, specific coordination among these multiple construction sites would be required and implemented through the Project's construction management plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. The Project would not require substantial roadway closures that may be hazardous to roadway travelers. Similar to the Project, each related project would also 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 Hollywood Community Plan are urbanized areas, and it is assumed that each of the related projects identified, as well as other future development within the Hollywood Community Plan area would likewise be serviced by one or more existing police stations. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.



*(b) Operation*

As shown in Table IV.G.2-3 on page IV.G.2-18, growth from the related projects that fall within the boundaries of the Hollywood Division is estimated to result in a police service population of approximately 7,275 persons, including permanent residents and daytime workers. When considering only residential population, the related projects are estimated to generate 3,930 residents. The Project does not include residential uses and would not add to this total. Accordingly, the Hollywood Division police service population would increase from 165,000 residents to 168,930 residents, which would decrease the officer-to-resident from 2.4 officers per 1,000 residents<sup>24</sup> to 2.3 officers per 1,000 residents whether or not the Project is implemented.<sup>25</sup>

The additional service population associated with the related projects and general growth in the Project vicinity would likewise also have an effect on crime in the Hollywood Division, which could increase based on per capita crime rates. Accordingly, cumulative growth could increase the demand for LAPD services in the Hollywood Division. In addition, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-6 to reduce the demand for police protection services on the Project Site. Therefore, the Project's incremental impact is not cumulatively considerable.

Furthermore, the Project vicinity and general Hollywood Community Plan area are located within an urbanized area and it is assumed that each of the related projects identified, as well as other future development within the Hollywood Community Plan area would likewise be serviced by one or more existing police stations. In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the General Plan Framework, 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. 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

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<sup>24</sup>  $(387 \text{ officers} / 165,000 \text{ residents}) \times 1,000 = 2.4 \text{ officers per } 1,000 \text{ residents}$

<sup>25</sup>  $(387 \text{ officers} / 168,930 \text{ residents}) \times 1,000 = 2.3 \text{ officers per } 1,000 \text{ residents}$

**Table IV.G.2-3  
Estimated Service Population from Related Projects within Hollywood Division**

<b>No.<sup>a</sup></b>	<b>Project Name/Address</b>	<b>Description</b>	<b>Unit/Area</b>	<b>Conversion Factor<sup>b</sup></b>	<b>Service Population</b>
1.	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	4 persons/ksf	508
2.	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	4 persons/ksf	423
3.	Hollywood 959 959 N. Seward St.	Office	241,568	4 persons/ksf	966
4.	The Lexington Mixed Use 6677 W. Santa Monica Blvd.	Apartments	695	2.25 persons/du	1,564
		Commercial	24,900	4 persons/ksf	100
5.	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Housing	45 du	2.25 persons/du	101
		Social Service Support Facility	50,325 sf	4 persons/ksf	201
		Office	17,040 sf	4 persons/ksf	68
		Commercial Retail/Restaurant	1,885 sf	4 persons/ksf	8
		Temporary Housing	100 bed	1 person/bed	100
6.	Mixed-Use 901 N. Vine St.	Apartments	70 du	2.25 persons/du	158
		Commercial	3,000 sf	4 persons/ksf	12
7.	Residential 712 N. Wilcox Ave.	Apartments	103 du	2.25 persons/du	232
8.	Hotel 1133 N. Vine St.	Hotel	112 rm	0.5 persons/rm	56
		Café	661 sf	4 persons/ksf	3
9.	2014 Residential 707 N. Cole Ave.	Apartments	84 du	2.25 persons/du	189
10.	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	2.25 persons/du	830
		Office	2,570 sf	4 persons/ksf	10
11.	Archstone Hollywood Mixed-Use 6901-6911 W. Santa Monica Blvd.	Apartments	231 du	2.25 persons/du	520
		Restaurant	5,000 sf	4 persons/ksf	20
		Retail	10,000 sf	2 persons/ksf	20

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

No. <sup>a</sup>	Project Name/Address	Description	Unit/Area	Conversion Factor <sup>b</sup>	Service Population
12.	Mixed-Use 1233 N. Highland Ave.	Apartments	72 du	2.25 persons/du	162
		Commercial	12,160 sf	4 persons/ksf	49
13.	Mixed-Use 6535 W. Melrose Ave.	Apartments	33 du	2.25 persons/du	74
		Restaurant	2,635 sf	4 persons/ksf	11
		Retail	2,321 sf	2 persons/ksf	5
14.	926 N. Sycamore Office	Media Production Office	70,742 sf	4 persons/ksf	283
15.	7007 West Romaine Mixed-Use 7007 W. Romaine St.	Media Office	28,468 sf	4 persons/ksf	114
		Restaurant	4,694 sf	4 persons/ksf	19
16	1235 Vine Street Project 1235 N. Vine St.	Office	109,190 sf	4 persons/ksf	437
		Restaurant	7,960 sf	4 persons/ksf	32
17	Hollywood Community Plan Update South of City of Burbank, City of Glendale, and SR 134; west of Interstate 5; north of Melrose Avenue; south of Mulholland Drive, City of West Hollywood, Beverly Hills, including land south of the City of West Hollywood and north of Rosewood Avenue between La Cienega Boulevard and La Brea Avenue.	Updates to the existing land use policies and land use diagram in the Hollywood Community Plan would result in future growth through horizon year 2040.			
<b>Related Projects Service Population</b>					<b>7,275</b>
<b>Project Net Service Population</b>					<b>544</b>
<b>Total Related + Project Net</b>					<b>7,819</b>
<b>Related Projects Residential Service Population</b>					<b>3,930</b>
<b>Project Net Residential Service Population</b>					<b>0</b>
<b>Total Related + Project Net (Residential)</b>					<b>3,930</b>
<p><i>du = dwelling units</i>  <i>emp = employees</i>  <i>ksf = 1,000 square feet</i>  <i>sf = square feet</i></p>					

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

<b>No.<sup>a</sup></b>	<b>Project Name/Address</b>	<b>Description</b>	<b>Unit/Area</b>	<b>Conversion Factor<sup>b</sup></b>	<b>Service Population</b>
<p><i>rm = rooms</i></p> <p><sup>a</sup> <i>The project number corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.</i></p> <p><sup>b</sup> <i>Residential population and number of employees is based on the employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>					

revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

However, as previously discussed, with the implementation of the Project Design Features as well as the Project's contribution to the General Fund, the Project would not generate a demand for additional police protection services that would exceed the LAPD's capacity to serve the Project Site.

With regard to police emergency response, the Project, related projects, and other future development within the Hollywood Community Plan area would introduce new uses that would generate additional traffic in the vicinity of the Project Site. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the Hollywood Division, and the Project would not contribute to a cumulative impact regarding emergency response. Furthermore, drivers of 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, in accordance with CVC Section 21806.

With regard to cumulative impacts on police protection, consistent with 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. 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. At this time, LAPD has not identified that it will be constructing a new station in the area and has concluded that the Project "individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities."<sup>26</sup> 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 or be reviewed in a Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection services would be less than significant.

**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**

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<sup>26</sup> *Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department December 17, 2020. See Appendix I of this Draft EIR.*

**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 impacts on police protection facilities would not be cumulatively considerable and, therefore, the Project's cumulative 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

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