

IV. Environmental Impact Analysis

L.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) dated December 12, 2023, and includes statistical data regarding police protection facilities, services, and response times. This information is included in Appendix N of this Draft EIR. Additional information included in this analysis is also based on LAPD's crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

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

- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management
- City of Los Angeles General Plan
 - Framework Element
 - Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- Los Angeles Police Department Computer Statistics Unit Program

- Los Angeles Police Department Guidelines and Plan Review

(1) State

(a) *California Vehicle Code, Section 21806*

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 found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety

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.

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.²

(c) California Penal Code

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

(2) Regional

(a) County of Los Angeles Office of Emergency Management

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

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

(3) Local

(a) City of 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.

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

³ *County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management*, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed January 15, 2025.

Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.L.2-1 on page IV.L.2-5. Chapter 9 of the Framework Element addresses Infrastructure and Public Services and includes the relevant goals, objectives, and policies outlined below in Table IV.L.2-1. 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.

(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 implement the City's General Plan 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.

The Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan) area. The Community Plan, adopted on May 13, 1998, includes the following goals, objectives, and policies that are relevant to police protection:

- Goal 8: A community with adequate police facilities and services to protect the community's residents from criminal activity, reduce the incidence of crime and provide other necessary law enforcement services.
- Objective 8-1: To provide adequate police facilities and personnel to correspond with population and service demands.
- Policy 8-1.1: Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

**Table IV.L.2-1
Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives,
and Policies**

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, City of Los Angeles General Plan Framework Element, 2001.</i></p>	

(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 Los Angeles Fire Department (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 regard to new development.

(d) Los Angeles Police Department Computer Statistics Unit Program

The LAPD Computer Statistics Unit (COMPSTAT) Program was created in 1994 and implements the Framework Element 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. The intent of COMPSTAT is to reduce the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.⁴

(e) Los Angeles Police Department Guidelines and Plan Review

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

- Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems;
 - Controlling and monitoring activities in parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas, and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;

⁴ LAPD, COMPSTAT, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/, accessed January 15, 2025.

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

b. Existing Conditions

(1) LAPD Service Area and Bureaus

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

According to LAPD’s correspondence, the departmental staffing resources within the LAPD include 8,940 sworn officers. Based on a total City population of 3,822,238, the LAPD currently has an officer-to-resident ratio of approximately one officer per 427.5 residents.⁸

The Project Site is located in the Valley Bureau, which covers a territory of 226.47 square miles with a population of approximately 1.8 million residents.⁹ The Valley Bureau oversees operations in the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley service areas.¹⁰ The Valley Bureau also oversees the Valley Traffic Division.¹¹

(2) LAPD Community Police Station

Within the Valley Bureau, the Project Site is located within the North Hollywood Division, which is served by the North Hollywood Community Police Station. As shown in Figure IV.L.2-1 on page IV.L.2-8, the North Hollywood Community Police Station is located

⁵ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed January 15, 2025.

⁶ LAPD, *LAPD Office of Operations*, www.lapdonline.org/office-of-the-chief-of-police/office-of-operations/, accessed January 15, 2025.

⁷ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed January 15, 2025.

⁸ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

⁹ LAPD, *About Valley Bureau*, www.lapdonline.org/lapd-contact/valley-bureau/, accessed January 15, 2025.

¹⁰ LAPD, *About Valley Bureau*, www.lapdonline.org/lapd-contact/valley-bureau/, accessed January 15, 2025.

¹¹ LAPD, *About Valley Bureau*, www.lapdonline.org/lapd-contact/valley-bureau/, accessed January 15, 2025.

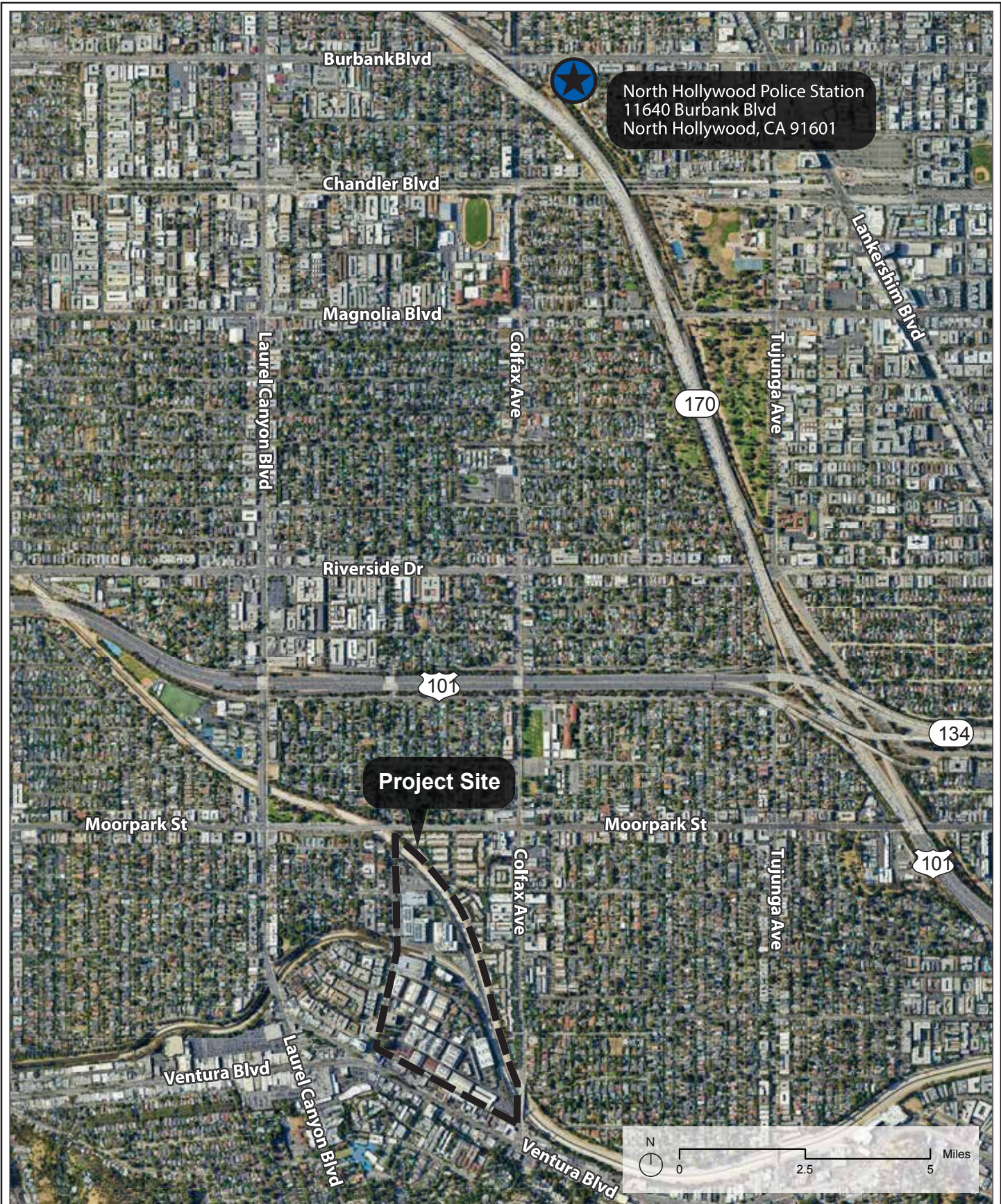


Figure IV.L.2-1
 Police Station Serving the Project Site

at 11640 Burbank Boulevard, approximately 2.7 miles north of the Project Site.¹² The North Hollywood Community Police Station service area covers 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, and West Toluca.¹³ The North Hollywood Community Police Station consists of 60 Reporting Districts; the Project Site is located in Reporting District 1583, which is bounded by Laurel Canyon to the west, Moorpark Street and Valley Spring Lane to the north, Tujunga Avenue to the east, and Ventura Boulevard to the south.¹⁴

The average response time for emergency—high priority, medium-high priority, and non-emergency calls from October 24, 2023, to November 24, 2023, were 4.6, 16.9, and 43.5 minutes, respectively. Citywide, the average response times for emergency—high priority, medium-high priority, and non-emergency calls during the same timeframe were 4.8, 17.0, and 34.8 minutes, respectively. As determined by LAPD, the response times for the North Hollywood Division are considered adequate.¹⁵

The North Hollywood Community Police Station serves a population of approximately 220,000 residents and is staffed by approximately 300 sworn officers and 31 civilian support staff. Based on the service population of 220,000 residents, the officer-to-resident ratio of the North Hollywood Community Police Station is approximately one officer per 733 residents.¹⁶ As such, the officer-to-resident ratio in the North Hollywood Division is lower than the citywide ratio of one officer per 427.5 residents.¹⁷

¹² *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

¹³ *LAPD, North Hollywood Community Police Station, www.lapdonline.org/lapd-contact/valley-bureau/north-hollywood-community-police-station/, accessed January 15, 2025.*

¹⁴ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

¹⁵ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

¹⁶ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

¹⁷ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

3. Project Impacts

a. Thresholds of Significance

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

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

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

The L.A. CEQA Thresholds Guide identifies the following factors to evaluate impacts to police protection services:

- 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, new or physically altered government facilities. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical 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 a project. Project design features that would reduce the impact of the Project on police services are also considered.

The need for or deficiency in adequate police protection 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 that project's CEQA document. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acres and one acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this analysis.

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 Project construction, the Applicant will implement temporary security measures, including security fencing, low-level security lighting, locked entry, and security patrols.

Project Design Feature POL-PDF-2: During operation, the Project will incorporate a 24/7 security plan to ensure the safety of its employees and visitors. The Project's security plan will include, but not be limited to, the following design features:

- Security fencing, walls, landscaping, and/or other elements to create a physical barrier at the Project Site perimeter;
- Secured points of entry with elements, such as guard booths, key card passes, and pedestrian and vehicular access controls;
- A 24-hour security camera network to provide visual surveillance of outdoor areas, parking facilities, and other activity areas;
- Private on-site security staff, including at guard booths, to control entry and regular security patrols of the Project Site; and
- Appropriate staff training on security protocols, including Project Site and building access control, managing and monitoring fire/life/safety systems, and patrolling the Project Site.

Project Design Feature POL-PDF-3: The Project will include appropriate lighting of buildings and walkways to provide for pedestrian orientation and to

clearly identify secure routes between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-4: The Project will include appropriate lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.

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

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

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

Additionally, the Applicant currently provides advance notice to and coordinates with LAPD regarding large special events, as reviewed and approved by the City and in accordance with the LAMC, that take place on the Project Site. As under existing conditions, on-site security and safety measures will continue to be implemented as part of future operations within the Project Site to reduce the demand for LAPD services pursuant to Project Design Feature POL-PDF-2. Further, as discussed in Section IV.M, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant will implement a Construction Traffic Management Plan that includes provisions for maintaining emergency access to and surrounding the Project Site during Project construction.

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 could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection public services?

(1) Impact Analysis

(a) Construction

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the North Hollywood Community Police Station because the daytime population generated at the Project Site during construction would be temporary in nature. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, as under existing conditions. Furthermore, access to the Project Site would continue to be controlled by staffed guard houses. Project construction would not contribute to an increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, additional temporary security measures, such as appropriate lighting, locked entry, and security patrols, would be implemented during construction. With continued implementation of these security measures, the potential demand for police protection services at the Project Site during construction would be reduced.

Construction activities, including those associated with off-site improvements proposed by the Project, also have the potential to affect emergency response due to lane closures, congestion, or otherwise reduced capacities of the adjacent streets.¹⁸ To implement the off-site improvements, segments of the existing sidewalks and roadways surrounding the Project Site are expected to be temporarily closed during certain phases of construction. However, a travel lane would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained. In addition, as discussed in Section IV.M, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access is available within and near the Project Site during construction activities.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term with varied intensities, Project construction activities could temporarily impact emergency response and access. However, with implementation of Project Design Feature TR-PDF-1, a Construction Traffic Management Plan would be implemented during Project construction to ensure that adequate and safe access would remain available within and near the Project Site during construction activities. As part of the Construction Traffic Management Plan, the majority of construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter A.M. and P.M.

¹⁸ Refer to Section II, Project Description, of this EIR, for a detailed list of off-site improvements proposed by the Project.

peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel will be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to CVC Section 21806.

Based on the above, Project construction activities would not generate a demand for additional police protection services that would necessitate the provision of new or physically altered governmental facilities. Accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during Project construction would be less than significant.

(b) Operation

As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. As such, because the Project proposes an expansion of an existing studio use, it would not introduce a new permanent residential population to the Project Site that could generate a direct demand for police protection services. Therefore, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the North Hollywood Division.

The Project would introduce a new employee and visitor population to the Project Site. As discussed in the Initial Study provided in Appendix A of this Draft EIR, the Project would result in an estimated net increase of 4,139 employees on the Project Site. In addition, under the potential exchange of uses for increased sound stage floor area, the Project would result in an estimated net increase of 4,589 employees on the Project Site. The Project would, therefore, contribute to an increase in the daytime population in the vicinity of the Project Site and, as such, may result in an increased demand for police services.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, the Project will continue to include numerous operational Project design features to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police protection services. In particular, as set forth in Project Design Feature POL-PDF-2, the Project will continue to include a 24/7 security plan to ensure the safety of its employees and visitors. This security plan will continue to include a secured Project Site perimeter and secured entry points, a 24-hour security camera network, private on-site

security staff, and regular security patrols of the Project Site. In addition, the Project will include appropriate lighting of buildings and walkways to orient pedestrians and clearly identify secure routes between parking areas and building points of entry, as set forth in Project Design Feature POL-PDF-3, as well as sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment per Project Design Feature POL-PDF-4. Furthermore, Project Design Feature POL-PDF-5 will require the design of Project entrances to and exits from buildings, spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Lastly, as specified in Project Design Features POL-PDF-6 and POL-PDF-7, the Applicant will consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site to LAPD showing access routes and other information to facilitate police response.

In addition to these security features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, if and as deemed appropriate. The proposed Project design features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police protection services. Overall, as determined by LAPD (see Appendix N of this Draft EIR), the Project would not require any special police protection requirements and would not result in the need for new or altered police facilities.¹⁹

As discussed in Section II, Project Description, the Project includes new and restored vehicular and pedestrian access points. As discussed in detail in Section IV.M, Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. Furthermore, the Radford Mobility River Connector would improve emergency access in the Project vicinity by providing an additional route that could be used by emergency vehicles. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, while Project-related trips would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays, pursuant to

¹⁹ *Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, December 12, 2023. See Appendix N of this Draft EIR.*

CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Moreover, as described in Subsection 2.a(1)(b), consistent with Section 35 of Article XIII of the California Constitution, 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.²⁰ Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the above analysis, Project operation would not result in a need to construct any new police protection 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 police protection facilities, or the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts. Therefore, impacts with regard to police protection services would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

As described in Section II, Project Description, of this Draft EIR, while Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the

²⁰ *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833.

Project Site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, the Project's security needs would not change with a later buildout date as such features are based on full occupancy and operation of the Project regardless of when they occur. While calls for service and surrounding traffic levels (and therefore response times) could potentially increase in future years due to anticipated growth in the surrounding area, as previously discussed, the City is legally obligated to provide adequate police protection services in accordance with state law. If the number of incidents in a given area increases, it is LAPD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, a later buildout date would not affect the impacts or significance conclusions presented above. In addition, no changes to the proposed Project design features would be necessary in the event of an extended buildout, except as needed to comply with future new or updated regulatory standards.

f. Cumulative Impacts

As discussed in Section III, Environmental Setting, of this Draft EIR, there are 13 related development projects that have been identified in the vicinity of the Project Site through 2028, the Project's anticipated buildout year.²¹ The projected growth reflected by Related Project Nos. 1 through 13 is a conservative assumption as some of the related projects may not be built out by 2028, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City. Nevertheless, to provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 13 are fully built out by 2028.

(1) Impact Analysis

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each project's development review process conducted by the City. Should Project construction occur concurrently with that of nearby related projects, coordination among these multiple construction sites would be required and implemented through each development's construction management plan, as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by LAPD to ensure that sufficient security measures are implemented to reduce

²¹ *While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. A later buildout date would not affect the cumulative impact analysis related to police protection.*

potential impacts to police protection services. Furthermore, given the short-term and intermittent nature of construction activities, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within the Project Site vicinity as drivers of police vehicles have the ability to avoid traffic pursuant to CVC Section 21806. **Therefore, cumulative construction impacts on police protection services would be less than significant.**

(b) Operation

As shown in Table IV.L.2-2 on page IV.L.2-19, growth from the related projects is estimated to result in a total police service population of approximately 3,601 persons, including both residents (permanent population) and employees (daytime population). When considering only residential population, the related projects are estimated to generate 2,438 residents. As described above, the Project does not include residential uses and would not add to this residential population. The residential population estimate associated with related projects is conservative in that it does not account for the removal of existing uses and their associated residential or employee populations. Notwithstanding, when considering these estimates, the North Hollywood Division police service residential population would increase from approximately 220,000 to 222,438 residents upon buildout of the related projects, which would, in turn, reduce the officer-to-resident ratio for the North Hollywood Division from the current ratio of approximately one officer per 733 residents to approximately one officer per 742 residents.

While the daytime population in the North Hollywood Division is anticipated to increase as a result of the Project, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-7 to reduce its demand for police protection services. Additionally, similar to the Project, each related project would be subject to the City's routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the Regulatory Framework section above, the LAPD would also continue to monitor population growth and land development throughout the City to 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. In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate.

**Table IV.L.2-2
Estimated Service Population from the Related Projects**

No.^a	Project Name/Address	Land Use	Unit/Area	Service Population
1	Mixed-Use 4021 Radford Ave.	Residential (Multi-Family)	48 du	108
		Residential (Affordable)	6 du	19
		Commercial	3,474 sf	7
2	Mixed-Use 11611 Ventura Blvd.	Assisted Living	140 du	315
		Senior Independent Living	62 du	195
3	Commercial 11601 Ventura Blvd.	Commercial	10,568 sf	21
4	Studio City Crossings Market/Retail 11265 Ventura Blvd.	Supermarket	37,079 sf	148
		Retail	1,581 sf	3
5	Condominiums 11331 Ventura Blvd.	Condominiums	62 du	140
6	Mixed-Use 12544 Ventura Blvd.	Residential	28 du	63
		Restaurant	16,580 sf	66
7	Mixed-Use 12548 Ventura Blvd.	Residential	62 du	140
		Retail	10,747 sf	21
		Commercial	1,925 sf	4
8	Mixed-Use 12582 Ventura Blvd.	Residential	34 du	77
		Commercial	5,100 sf	10
9	Harvard-Westlake River Park Project 4141 Whitsett Ave.	Recreational and Sports Facility	17.2 acres	749 ^b
10	Mixed-Use 11311 Camarillo St.	Residential (Multi-Family)	54 du	122
		Residential (Affordable)	6 du	19
		Retail	2,826 sf	6
11	Sportsmen's Lodge 12833 Ventura Blvd.	Residential (Multi-Family)	442 du	995
		Residential (Affordable)	78 du	245
		Retail	27,926 sf	56
		Restaurant	18,019 sf	72
12	BOE Bikeway and Greenway River Improvements	Pedestrian and Bicycle Improvements and BMPs along LA River/Tujunga Wash	N/A	N/A
13	DWP Trunkline South	Pump Station and Water Pipe	N/A	N/A
Related Project Service Population				3,601
Project Service Population				4,589^c
Total Service Population for Related Projects and Project				8,190
Related Projects Permanent Residential Service Population				2,438
Project Permanent Residential Service Population				0

**Table IV.L.2-2 (Continued)
Estimated Service Population from the Related Projects**

No. ^a	Project Name/Address	Land Use	Unit/Area	Service Population
Total Permanent Residential Service Population for Related Projects and Project				2,504
<p><i>du = dwelling units</i></p> <p><i>Numbers may not sum precisely due to rounding.</i></p> <p>^a <i>Related Project No. corresponds to Table III-1, List of Related Projects, and Figure III-1 in Section III, Environmental Setting, of this Draft EIR.</i></p> <p>^b <i>Based on average daily service population provided in Section IV.L.2, Public Services of the Harvard-Westlake River Park Project Draft EIR, March 2022.</i></p> <p>^c <i>The Project would result in an estimated net increase of 4,139 employees on the Project Site. Under the potential exchange of uses for increased sound stage floor area, the Project would result in an estimated net increase of 4,589 employees on the Project Site.</i></p> <p><i>Source: Eyestone Environmental, 2024.</i></p>				

With regard to emergency response, the Project and related projects would introduce new uses in the Project area that would generate additional trips, which would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays. As discussed above, the Project is not anticipated to substantially affect emergency response times in the North Hollywood Area, and the Project would not contribute to a cumulative impact relative to emergency response times. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to CVC Section 21806.

Moreover, as described in Subsection 2.a(1)(b), consistent with Section 35 of Article XIII of the California Constitution, the obligation to provide adequate police protection services is the responsibility of the City.²² Through the City’s regular budgeting efforts, LAPD’s resource needs, including staffing, equipment, and possible 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.”²³ If LAPD determines that new facilities are necessary at some point in the future, such facilities:

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

²³ *Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department, May 11, 2023. See Appendix N of this Draft EIR.*

(1) would occur where allowed under the designated land use; (2) would likely be located on parcels that are infill opportunities on lots that are between 0.5 acres 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. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document.

Based on the above, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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