IV. Environmental Impact Analysis

H.2 Public Services—Police Protection

1. Introduction

This section of the Draft EIR describes existing police protection services in the vicinity of the Project Site and provides an analysis of the Project's potential impacts to police protection facilities. The focus of the analysis is the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site. This section is based, in part, on information provided by the LAPD's Community Relationship Division, which is included in Appendix K of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding police protection and emergency services in the State as well as the City of Los Angeles (City). As described below, these plans and guidelines include the California Vehicle Code (CVC), Los Angeles General Plan Framework, and the City of Los Angeles Charter and Administrative and Municipal Codes.

(1) State

(a) California Vehicle Code

Section 21806 of the CVC pertains to emergency vehicles responding to Code 3 incidents/calls.¹ This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as

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.

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 at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection services, as well as other public safety services. In City of Hayward v. Board of Trustee of California State University (2015) 242 Cal.App.4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

(2) Local

(a) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines citywide policies regarding land use, including infrastructure and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the

public safety needs of that neighborhood.² Objective 9.13 and Policy 9.13.1 require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future police protection needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet such needs. Further, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance agreements with other local law enforcement agencies, state law enforcement agencies, and the National Guard. In addition to the Framework Element, the City's General Plan Safety Element recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies.

Presently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT Plus is based on the COMPSTAT program that was created in 1994 by then-Police Commissioner of the New York Police Department and former LAPD Chief William J. Bratton. The COMPSTAT system implements a multi-layer approach to police protection services through statistical and geographical information system analysis of trends in crime through its specialized crime control model. Under COMPSTAT, Part 1 Crimes were reduced by approximately 4 percent in 2003 (homicides were reduced by approximately 21 percent during this period), when compared to 2002.^{3,4,5} For the four-week period after implementation of COMPSTAT Plus in the LAPD's Southeast Area in 2004, violent crimes were down 11 percent. ⁶

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

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

² The Framework Element of the Los Angeles General Plan, Chapter 9: Infrastructure and Public Services.

Part I crimes are "serious offences" consisting of homicide, rape, burglary, aggravated assault, robbery, burglary/theft from vehicle, personal/other theft, auto theft, Los Angeles Police Department, see COMPSTAT PLUS, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 9, 2020.

⁴ William J. Bratton and Sean W. Malinowski, Police Performance Management in Practice: Taking COMPSTAT to the Next Level, 2008.

⁵ LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 9, 2020.

⁶ LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 9, 2020.

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

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: the Central Bureau, the West Bureau, the South Bureau, and the Valley Bureau.⁷ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD's 21 community police stations.⁸ Each geographic bureau is comprised of four to five geographic areas/police stations.⁹

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

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. The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles service areas. 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. Within the West Bureau, the Project Site is located within the Hollywood service area.

⁷ LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 9, 2020.

⁸ LAPD, Community Police Station Address Directory, www.lapdonline.org/our_communities/content_basic_view/6279, accessed January 9, 2020.

⁹ LAPD, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 9, 2020.

¹⁰ LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19 to 12/28/19, accessed January 7, 2020.

¹¹ LAPD, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed January 9, 2020.

¹² LAPD, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed January 9, 2020.

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

(2) LAPD Community Police Station

Within the Hollywood service area, the Project Site is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.4 mile south of the Project Site. The location of the police station that serves the Project Site is depicted in Figure IV.H.2-1 on page IV.H.2-6. The Hollywood Community Police Station has a service area of approximately 17 square miles and is bounded by Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south. This station serves a population of approximately 300,000 persons and is staffed by approximately 352 sworn officers and 32 civilian support staff. Are average response time for service in the Hollywood Service Area in 2016 was 3.2 minutes for emergency calls and 22.9 minutes for non-emergency calls. Based on the police service population of approximately 300,000 persons, the officer-to-resident ratio is approximately 1.2 officers per 1,000 residents. As such, the officer to resident ratio in the Hollywood Area is lower than the Citywide ratio of 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.H.2-1 on page IV.H.2-7 shows a comparison of the Hollywood Service Area and Citywide data regarding crimes as reported by the LAPD based on only residential populations. As shown therein, based on the most recent data available from Compstat for the year 2019, 6,223 crimes were reported within the Hollywood Service Area¹⁸ and 120,828 crimes were reported citywide.¹⁹ Based on the residential service population of the Hollywood Community Police Station, approximately 20.74 crimes per 1,000 residents²⁰

LAPD, Hollywood Community Police Station, www.lapdonline.org/hollywood_community_police_station, accessed January 9, 2020.

¹⁵ LAPD, About Hollywood, www.lapdonline.org/hollywood_most_wanted/content_basic_view/1665, accessed January 9, 2020.

¹⁶ LAPD, About Hollywood, www.lapdonline.org/hollywood_most_wanted/content_basic_view/1665, accessed January 9, 2020.

Written correspondence from Christopher Gibson, Community Relationship Division, Los Angeles Police Department, October 5, 2017. See Appendix K of this Draft EIR.

LAPD, COMPSTAT Unit, COMPSTAT Hollywood Area Profile 12/01/19 to 12/28/19, accessed January 9, 2020.

¹⁹ LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19 to 12/28/19, accessed January 7, 2020.

²⁰ 6,223 crimes/300,000 residents = 20.74 crimes per 1,000 residents.



Police Station Serving the Project Site

Source: Apple Maps, 2017.

Table IV.H.2-1
2019 Crimes—Hollywood Service Area and Citywide

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Hollywood Service Area	6,223	300,000	20.74/1,000	0.0207
Citywide	120,828	4,029,741	29.98/1,000	0.0300

Source: LAPD, COMPSTAT Unit, COMPSTAT Hollywood Area Profile 12/01/19 to 12/28/19, accessed January 9, 2020; LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19 to 12/28/19, accessed January 7, 2020.

(0.0207 crime per capita²¹) were reported in the Hollywood Service Area and 29.98 crimes per 1,000 residents²² (0.0300 crime per capita²³) were experienced citywide.

Based on the number of sworn officers staffing the Hollywood Community Police Station (352 sworn officers), the 2019 ratio of crimes per officer is 17.7 crimes per officer²⁴ in comparison to a 2019 citywide ratio of 12.0 crimes per officer (10,033 sworn officers citywide).²⁵ Thus, the Hollywood Service Area has a higher crime per officer ratio compared to the City as a whole.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, 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.

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²¹ 300,000 residents/6,223 crimes = 0.0207 crimes per capita.

²² 120,828 crimes/4,029,741 residents = 29.98 crimes per 1,000 residents.

²³ 4,029,741 residents/120,828 crimes = 0.030 crimes per capita.

²⁴ 6,223 crimes/352 sworn officers = 17.7 crimes per officer.

²⁵ 120,828 crimes/10,033 sworn officers = 12.0 crimes per officer.

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

- 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, result in demand for new or physically altered 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 LAPD's focus on the number of crimes per resident, 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 Service Area 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.²⁶ To the extent a project generates demand for additional police services that results in the need to construct new facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact needs to be evaluated within the project EIR and mitigated (if feasible), if found to be significant. The ultimate determination of whether a

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²⁶ City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

significant impact to the environment related to police services would result from a project is determined by whether construction of new or expanded police facilities is reasonably foreseeable as a direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of police facilities in the Project's impact area. Therefore, the City makes the following assumptions based on existing zoning standards and historical development of police facilities, that in the event the City determines that expanded or new police facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration.

c. Project Design Features

The following project design features are proposed with regard to police protection:

- Project Design Feature POL-PDF-1: During construction, the Applicant shall implement temporary security measures including security fencing, lighting, and locked entry.
- Project Design Feature POL-PDF-2: The Project shall include a closed circuit camera system and keycard entry for the residential building and the residential parking areas
- Project Design Feature POL-PDF-3: The Project shall provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- Project Design Feature POL-PDF-4: The Project shall provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.
- Project Design Feature POL-PDF-5: The Project shall design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.
- Project Design Feature POL-PDF-6: Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant shall submit a diagram of the Project Site to the LAPD's Hollywood Service Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Service Area. 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 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 impact LAPD police protection services and response times within the Hollywood Service Area due to construction impacts on the surrounding roadways. As discussed in the Project's Traffic Study included as Appendix O.1 of this Draft EIR, 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. In addition, a construction traffic management plan, including a worksite traffic control plan, would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the Los

Angeles Department of Transportation (LADOT) and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, 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, upon implementation of the Project design features and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site or surrounding area. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's service capability; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Further, the Project would not cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Impacts during Project construction would be less than significant.

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct a mixed-use project with 260 residential units, 11,020 square feet of retail uses, 3,200 square feet of restaurant uses, and 2,580 square feet of office uses. The Project would introduce a new residential, employee, and visitor population to the Project Site and increase the police service population of the Hollywood Service Area.

The Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, approximately 0.4 mile south of the Project Site. The Hollywood Community Police Station is staffed by 352 sworn officers and a 32-person civilian support staff. As shown in Table IV.H.2-2 on page IV.H.2-12, using the Police Service Population Conversion Factors in the *L.A. City CEQA Thresholds Guide*, the Project's residential service population would be 793 persons, which would increase the existing LAPD residential service population in the Hollywood Service Area from 300,000 to 300,793 persons. When taking existing and proposed commercial uses into account, the Project would result in a net service population of 763 persons. Despite the increase in police service population, the officer-to-resident ratio for the Hollywood Service Area would remain at its current level of approximately 1.2 officers per 1,000 residents.

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

Land Use	Units	Conversion Factor ^a	Total Police Service Population
Existing			
Commercial	29,200 sf	0.003 persons/sf	88
Proposed	•		
Residential: Studio, 1-Bedroom & 2-Bedroom Units	247 du	3 persons/unit	741
Residential: 3-Bedroom Units	13 du	4 persons/unit	52
Retail/Restaurant	14,220 sf	0.003 persons/sf	43
Office	3,580 sf	0.004 persons/sf	15
Subtotal Proposed			851
Project Net Police Service Population (Proposed – Existing)			763 (793 Residents Only)

du = dwelling units

sf = square feet

rm = room

^a The following L.A. City CEQA Thresholds Guide, K. Police Service Population Conversion Factors provided on page K.1-3 of that document were used: Residential (Studio, one-, and two-bedroom units): 3 persons/unit; Retail: 3 persons/1,000 sf; Office: 4 persons/1,000 sf. Note that this resulting population is greater than that calculated from the persons per household rate which is used elsewhere in this Draft EIR. The higher police service population for the Project (which is based on the police service population factors in the L.A. City CEQA Thresholds Guide) is used for purposes of providing a conservative analysis of impacts on police services provided by the Hollywood Community Police Station.

Source: Eyestone Environmental, 2020.

As shown in Table IV.H.2-1 on page IV.H.2-7, approximately 6,223 crimes were reported in the Hollywood Service Area for 2019, which equates to a crime rate of 20.74 crimes per 1,000 residents or 0.0207 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.0207 crime per capita, the Project's residential service population could potentially generate approximately 16 new crimes per year. This would increase the annual number of crimes reported in the Hollywood Service Area from 6,223 to 6,239 reported crimes per year, an increase of 0.26 percent. 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

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Total crimes generated by the Project = estimated crime rate of 0.0207 crime per capita x Project residential service population of 793 persons = 16 crimes.

Feature POL-PDF-2, the Project would include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of buildings and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project would also design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6, the Applicant would submit a diagram of the Project Site showing access routes and other information that might facilitate police response. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. 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 following discussion of emergency response is provided for informational purposes only. 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. However, the LAPD has concluded that based on its size, the Project could have a minor impact on police services in the Hollywood Service Area.²⁸ However, based on the above analysis, the Project is not anticipated to generate a demand for new LAPD's facilities to serve the Project Site. Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts.

²⁸ See Appendix K of this Draft EIR.

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. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

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

(3) Level of Significance After Mitigation

Project-level impacts related to police protection facilities would be less than significant.

e. Cumulative Impacts

(1) Impact Analysis

As identified in Section III, Environmental Setting, of this Draft EIR, a total of 107 related projects are located in the vicinity of the Project Site. Of the 107 related projects, 98 of the related projects fall within the boundaries of the Hollywood Service Area. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Settings, of this Draft EIR. In addition, the Hollywood Community Plan Update, is identified below. However, as described in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 107, which itself is a conservative assumption, would account for any initial amount of growth that may occur between the adoption of the Community Plan Update and Project buildout.

(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 in proximity to the Project Site, 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 right-of-ways. the Project would not require substantial roadway closures that may be hazardous to roadway travelersSimilar 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 (see Subsection 2.a.(2)(d) above). Furthermore, the Project vicinity and general Hollywood Community Plan area are highly urbanized 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 currently serviced by one or more existing police Therefore, the Project and related projects do not propose to introduce new populations into currently underserved areas necessitating a new facility. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable.

(b) Operation

As shown in Table IV.H.2-3 on page IV.H.2-16, based on the police service population conversion factors provided on page K.1-3 of the *L.A. CEQA Thresholds Guide*, growth from the related projects that fall within the boundaries of the Hollywood Service Area is estimated to result in total service population of approximately 93,126 persons, including both residents (permanent population) and employees (daytime population). As described above, the Project would contribute to this cumulative increase by generating a net service population of approximately 763 persons, including permanent residents and daytime workers. When considering only residential population, the related projects are estimated to generate 52,720 residents. As such, the related projects' residential population plus the Project's 793 net new residents would result in an estimated increase of 53,513 residents in the Hollywood Service Area. Accordingly, the Hollywood Area police service population would increase from 300,000 to 353,513 residents, which would decrease the officer-to-resident

The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Hollywood Service Area, which could increase based on per capita crime rates. Accordingly, cumulative population growth could increase the demand for LAPD services in the Hollywood Service Area. Assuming the same crimes-per-capita rate currently observed in the Hollywood Area (0.0207 crime per capita), the residential population of the Project and related projects could generate an

Table IV.H.2-3
Estimated Service Population from Related Projects within Hollywood Service Area^a

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
1.	Paseo Plaza Mixed-Use	Condominiums	375 du	4 persons/du	1,500	32
	5651 W. Santa Monica Blvd.	Retail	377,900 sf	0.003 person/sf	1,134	24
2.	BLVD 6200 Mixed-Use	Live/Work	28 du	4 persons/du	112	3
	6200 W. Hollywood Blvd.	Apartments	1,014 du	4 persons/du	4,056	85
		Retail	175,000 sf	0.003 person/sf	525	11
3.	Sunset Bronson Studios 5800 W. Sunset Blvd.	Office	404,799 sf	0.004 person/sf	1,620	34
4.	Yucca Street Condos	Apartments	114 du	4 persons/du	456	10
	6230 W. Yucca St.	Commercial	2,697 sf	0.003 person/sf	9	1
5.	Hollywood 959 959 N. Seward St.	Office	241,568 sf	0.004 person/sf	967	21
6.	Archstone Hollywood Mixed-Use	Apartments	231 du	4 persons/du	924	20
	Project 6901–6911 W. Santa Monica Blvd.	High-Turnover Restaurant	5,000 sf	0.003 person/sf	15	1
		General Retail	10,000 sf	0.003 person/sf	30	1
7.	Temple Israel of Hollywood 7300 W. Hollywood Blvd.	Temple Expansion ^e	47,010 sf	0.004 person/sf	189	4
8.	Mixed-Use	Apartments	49 du	4 persons/du	196	5
	5245 W. Santa Monica Blvd.	Retail	32,272 sf	0.003 person/sf	97	3
9.	Selma Hotel	Hotel	180 rm	1.5 persons/rm	270	6
	6417 W. Selma Ave.	Restaurant	12,840 sf	0.003 person/sf	39	1
10.	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	4 persons/du	228	5
11.	Hollywood Gower Mixed-Use	Apartments	220 du	4 persons/du	880	19
	6100 W. Hollywood Blvd.	Restaurant	3,270 sf	0.003 person/sf	10	1
12.	Mixed-Use Office/Retail	Office	88,750 sf	0.004 person/sf	355	8
	936 N. La Brea Ave.	Retail	12,000 sf	0.003 person/sf	36	1

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes ^d
13.	Pantages Theatre Office 6225 W. Hollywood Blvd.	Office	210,000 sf	0.004 person/sf	840	18
14.	Selma & Vine Office Project 1601 N. Vine St.	Office	100,386 sf	0.004 person/sf	402	9
		Commercial	2,012 sf	0.003 person/sf	7	1
15.	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	1.5 persons/rm	338	8
16.	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	0.004 person/sf	508	11
17.	Hotel & Restaurant Project	Hotel	80 rm	1.5 persons/rm	120	3
	6381 W. Hollywood Blvd.	Restaurant	15,290 sf	0.003 person/sf	46	1
18.	Emerson College Project (Student	Student Housing	224 du	4 persons/du	896	19
	Housing)	Faculty/Staff Housing	16 du	4 persons/du	64	2
	1460 N. Gordon St.	Retail	6,400 sf	0.003 person/sf	20	1
19.	Television Center (TVC Expansion)	Office	114,725 sf	0.004 person/sf	459	10
	6300 W. Romaine St.	Gym ^e	40,927 sf	0.004 person/sf	164	4
		Dance Studio ^e	38,072 sf	0.004 person/sf	153	4
20.	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	0.004 person/sf	425	9
21.	Selma Community Housing 1603 N. Cherokee Ave.	Apartments	66 du	4 persons/du	264	6
22.	Hudson Building	Restaurant	10,402 sf	0.003 person/sf	32	1
	6523 W. Hollywood Blvd.	Office	4,074 sf	0.004 person/sf	17	1
		Storage	890 sf	0.004 person/sf	4	1
23.	La Brea Gateway	Supermarket	33,500 sf	0.003 person/sf	101	3
	915 N. La Brea Ave.	Apartments	179 du	4 persons/du	716	15
24.	Target Retail Shopping Center Project	Discount Store	163,862 sf	0.003 person/sf	492	11
	5520 W. Sunset Blvd.	Shopping Center	30,887 sf	0.003 person/sf	93	2

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
25.	Residential 712 N. Wilcox Ave.	Apartments	103 du	4 persons/du	412	9
26.	Mixed-Use	Apartments	248 du	4 persons/du	992	21
	1600–1610 N. Highland Ave.	Retail	12,785 sf	0.003 person/sf	39	1
27.	Millennium Hollywood Mixed-Use	Apartments	492 du	4 persons/du	1,968	41
	Project ^b	Hotel	200 rm	1.5 persons/rm	300	7
	1740 N. Vine St.	Office	100,000 sf	0.004 person/sf	400	9
		Fitness Club	35,000 sf	0.004 person/sf	140	3
		Retail	15,000 sf	0.003 person/sf	45	1
		Restaurant	34,000 sf	0.003 person/sf	102	3
28.	Paramount Pictures	Production Office ^e	635,500 sf	0.004 person/sf	2,542	53
	5555 W. Melrose Ave.	Office	638,100 sf	0.004 person/sf	2,553	53
		Retail	89,200 sf	0.003 person/sf	268	6
		Stage ^e	21,000 sf	0.004 person/sf	84	2
		Support Uses ^e	1,900 sf	0.004 person/sf	8	1
29.	Apartments	Apartments	76 du	4 persons/du	304	7
	1411 N. Highland Ave.	Commercial	2,500 sf	0.003 person/sf	8	1
30.	Apartment Project 1824 N. Highland Ave.	Apartments	118 du	4 persons/du	472	10
31.	Hotel	Hotel	112 rm	1.5 persons/rm	168	4
	1133 N. Vine St.	Café	661 sf	0.003 person/sf	2	1
32.	The Lexington Mixed-Use	Apartments	695 du	4 persons/du	2,780	58
	6677 W. Santa Monica Blvd.	Commercial	24,900 sf	0.003 person/sf	75	2
33.	Columbia Square Mixed-Use	Apartments	200 du	4 persons/du	800	17
	6121 W. Sunset Blvd.	Office	422,610 sf	0.004 person/sf	1,691	36
		Retail/Restaurant	41,300 sf	0.003 person/sf	124	3
		Hotel	125 rm	1.5 persons/rm	188	4

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
34.	Mixed-Use (High Line West)	Apartments	280 du	4 persons/du	1,120	24
	5550 W. Hollywood Blvd.	Retail	12,030 sf	0.003 person/sf	37	1
35.	Tutoring Center	School ^g	100 stu	1 person/stu	100	3
	927 N. Highland Ave.	Tutoring Employeesh	18 emp	1 person/emp	18	1
36.	Las Palmas Residential (Hollywood	Residential	224 du	4 persons/du	896	19
	Cherokee) 1718 N. Las Palmas Ave.	Retail	985 sf	0.003 person/sf	3	1
37.	Mixed-Use	Condominiums	13 du	_	_	_
	6915 Melrose Ave.	Retail	6,250 sf	_	_	
38.	Sunset & Vine Mixed-Use	Apartments	306 du	4 persons/du	1,224	26
	1538 N. Vine St.	Retail	68,000 sf	0.003 person/sf	204	5
39.	Condos & Retail	Condominiums	96 du	4 persons/du	384	8
	5663 Melrose Ave.	Retail	3,350 sf	0.003 person/sf	11	1
40.	6250 Sunset (Nickelodeon)	Apartments	200 du	4 persons/du	800	17
	6250 W. Sunset Blvd.	Retail	4,700 sf	0.003 person/sf	15	1
41.	Hollywood Central Parkb	Park (14.35 ac) ^e	625,086 sf	0.004 person/sf	2,501	52
	Hollywood Freeway (US-101)	Amphitheater ⁱ	500 seat	1 person/seat	500	11
		Inn	5 rm	1.5 persons/rm	8	1
		Community Center ^e	30,000 sf	0.004 person/sf	120	3
		Banquet Space ^e	15,000 sf	0.004 person/sf	60	2
		Commercial	29,000 sf	0.003 person/sf	87	2
		Apartments (low income)	15 du	4 persons/du	60	2
42.	Movietown	Apartments	371 du	_	_	_
	7302 W. Santa Monica Blvd.	Office	7,800 sf	_	_	_
		Restaurant	5,000 sf	_		_
		Commercial	19,500 sf	_	_	_

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
43.	Mixed-Use	Office	274,000 sf	0.004 person/sf	1,096	23
	5901 Sunset Blvd.	Supermarket	26,000 sf	0.003 person/sf	78	2
44.	Mixed-Use	Apartments	410 du	4 persons/du	1,640	35
	7107 Hollywood Blvd.	Restaurant	5,000 sf	0.003 person/sf	15	1
		Retail	5,000 sf	0.003 person/sf	15	1
45.	John Anson Ford Theater	Theater	311 seats	1 person/seat	311	7
	2580 Cahuenga Blvd. East	Restaurant	5,400 sf	0.003 person/sf	17	1
		Office employeesh	30 emp	1 person/emp	30	1
46.	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	4 persons/du	356	8
47.	Sunset + Wilcox	Hotel	200 rm	1.5 persons/rm	300	7
	1541 N. Wilcox Ave.	Restaurant	9,000 sf	0.003 person/sf	27	1
48.	Mixed-Use	Apartments	200 du	4 persons/du	800	17
	1350 N. Western Ave.	Guest Rooms	4 du	1.5 persons/du	6	1
		Retail/Restaurant	5,500 sf	0.003 person/sf	17	1
49.	Palladium Residences	Apartments	731 du	4 persons/du	2,924	61
	6201 W. Sunset Blvd.	Retail/Restaurant	24,000 sf	0.003 person/sf	72	2
50.	5600 West Hollywood Boulevard	Apartments	33 du	4 persons/du	132	3
	5600 W. Hollywood Blvd.	Commercial	1,289 sf	0.003 person/sf	4	1
51.	5750 Hollywood	Apartments	161 du	4 persons/du	644	14
	5750 Hollywood Blvd.	Commercial	4,747 sf	0.003 person/sf	15	1
52.	925 La Brea Avenue	Retail	16,360 sf	0.003 person/sf	50	2
	925 La Brea Ave.	Office	45,432 sf	0.004 person/sf	182	4
53.	904 La Brea Avenue	Apartments	169 du	4 persons/du	676	15
	904 La Brea Ave.	Retail	37,057 sf	0.003 person/sf	112	3
54.	2014 Residential 707 N. Cole Ave.	Apartments	84 du	4 persons/du	336	7

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
55.	Cahuenga Boulevard Hotel	Hotel	64 rm	1.5 persons/rm	96	2
	1525 N. Cahuenga Blvd.	Restaurant/Lounge	700 sf	0.003 person/sf	3	1
		Restaurant	3,300 sf	0.003 person/sf	10	1
56.	Academy Square	Office	285,719 sf	0.004 person/sf	1,143	24
	1341 Vine St.	Apartments	200 du	4 persons/du	800	17
		Restaurant	16,135 sf	0.003 person/sf	49	2
57.	Hotel	Hotel	70 rm	1.5 persons/rm	105	3
	6500 Selma Ave.	Restaurant	4,320 sf	0.003 person/sf	13	1
58.	Hotel	Hotel	122 rm	1.5 persons/rm	183	4
	1921 Wilcox Ave.	Restaurant	4,225 sf	0.003 person/sf	13	1
59.	Sunset Mixed-Use	Apartments	213 du	4 persons/du	852	18
	7500–7510 W. Sunset Blvd.	Restaurant	10,000 sf	0.003 person/sf	30	1
		Retail	20,000 sf	0.003 person/sf	60	2
60.	Mixed-Use	Apartments	70 du	4 persons/du	280	6
	901 N. Vine St.	Commercial	3,000 sf	0.003 person/sf	9	1
61.	Apartments 525 N. Wilton Pl.	Apartments	88 du	4 persons/du	352	8
62.	Hardware Store 4905 W. Hollywood Blvd.	Retail	36,600 sf	_	_	_
63.	Mixed-Use	Apartments	72 du	4 persons/du	288	6
	1233 N. Highland Ave.	Commercial	12,160 sf	0.003 person/sf	37	1
64.	Mixed-Use	Apartments	369 du	4 persons/du	1,476	31
	1310 N. Cole Ave.	Office	2,570 sf	0.004 person/sf	11	1
65.	TAO Restaurant 6421 W. Selma Ave.	Restaurant	17,607 sf	0.003 person/sf	53	2

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes ^d
66.	Crossroads Hollywood	Residential	950 du	4 persons/du	3,800	79
	1540–1552 Highland Ave.	Hotel	308 rm	1.5 persons/rm	462	10
		Office	95,000 sf	0.004 person/sf	380	8
		Commercial/Retail	185,000 sf	0.003 person/sf	555	12
67.	Wilcox Hotel	Hotel	133 rm	1.5 persons/rm	200	5
	1717 N. Wilcox Ave.	Retail	3,580 sf	0.003 person/sf	11	1
68.	Faith Plating	Residential	145 du	_	_	_
	7143 Santa Monica Blvd.	Retail/Restaurant	7,858 sf	_	_	_
69.	7811 Santa Monica Boulevard	Hotel	78 rm	_	_	_
	7811 Santa Monica Blvd.	Residential	88 du	_	_	_
		Commercial	65,888 sf	_	_	_
70.	Apartments 5460 W. Fountain Ave.	Apartments	75 du	4 persons/du	300	7
71.	Mixed-Use	Hotel	210 rm	1.5 persons/rm	315	7
	6220 W. Yucca St.	Apartments	136 du	4 persons/du	544	12
		Restaurant	6,980 sf	0.003 person/sf	21	1
72.	SunWest Project (Mixed-Use)	Apartments	293 du	4 persons/du	1,172	25
	5525 W. Sunset Blvd.	Commercial	33,980 sf	0.003 person/sf	102	3
73.	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	4 persons/du	740	16
74.	Ivar Gardens Hotel	Hotel	275 rm	1.5 persons/rm	413	9
	6409 W. Sunset Blvd.	Retail	1,900 sf	0.003 person/sf	6	1
75.	Selma Hotel	Hotel	212 rm	1.5 persons/rm	318	7
	6516 W. Selma Ave.	Bar/Lounge	3,855 sf	0.003 person/sf	12	1
		Rooftop Bar/Event Space ^e	8,500 sf	0.004 person/sf	34	1
76.	Melrose Crossing Mixed-Use	Apartments	40 du	_	_	<u> </u>
	7000 Melrose Ave.	Retail	6,634 sf	-	_	

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
77.	Mixed-Use	Apartments	91 du	4 persons/du	364	8
	1657 N. Western Ave.	Retail	15,300 sf	0.003 person/sf	46	1
78.	McCadden Campus (LGBT)	Housing	45 du	4 persons/du	180	4
	1118 N. McCadden Pl.	Social Service Support Facility ^e	50,325 sf	0.004 person/sf	202	5
		Office	17,040 sf	0.004 person/sf	69	2
	4000 Hallywood Mixed Llag	Commercial/Retail or Restaurant	1,885 sf	0.003 person/sf	6	1
		Temporary Housing ^j	100 bed	1 person/bed	100	3
79.	4900 Hollywood Mixed-Use	Apartments	150 du	_	_	_
	4900 W. Hollywood Blvd.	Retail	13,813 sf	_	_	_
80.	citizenM Hotel	Hotel	216 rm	1.5 persons/rm	324	7
	1718 Vine St.	Restaurant	4,354 sf	0.003 person/sf	14	1
81.	7900 Hollywood 7900 Hollywood Blvd.	Apartments	50 du	4 persons/du	200	5
82.	Apartments ^b	Apartments	70 du	4 persons/du	280	6
	1749 Las Palmas Ave.	Retail	3,117 sf	0.003 person/sf	10	1
83.	Mixed-Use	Apartments	96 du	4 persons/du	384	8
	1868 N. Western Ave.	Retail	5,546 sf	0.003 person/sf	17	1
84.	6400 Sunset Mixed-Use	Apartments	232 du	4 persons/du	928	20
	6400 Sunset Blvd.	Restaurant	7,000 sf	0.003 person/sf	21	1
85.	6200 West Sunset Boulevard	Apartments	270 du	4 persons/du	1,080	23
	6200 W. Sunset Blvd.	Quality Restaurant	1,750 sf	0.003 person/sf	6	1
		Pharmacy	2,300 sf	0.003 person/sf	7	1
		Retail	8,070 sf	0.003 person/sf	25	1
86.	747 North Western Avenue	Apartments	44 du	4 persons/du	176	4
	747 N. Western Ave.	Retail	7,700 sf	0.003 person/sf	24	1

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes d
87.	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	4 persons/du	160	4
88.	1001 North Orange Drive 1001 N. Orange Dr	Office	53,537 sf	0.004 person/sf	215	5
89.	Sunset & Western	Apartments	735 du	4 persons/du	2,940	61
	5420 W. Sunset Blvd.	Commercial	95,820 sf	0.003 person/sf	288	6
90.	Mixed-Use	Live/Work	45 du	_	_	_
	4914 W. Melrose Ave.	Retail	3,760 sf	_	_	_
91.	Onni Group Mixed-Use Development	Condominiums	429 du	4 persons/du	1,716	36
	1360 N. Vine St.	Grocery	55,000 sf	0.003 person/sf	165	4
		Retail	5,000 sf	0.003 person/sf	15	1
		Restaurant	8,988 sf	0.003 person/sf	27	1
92.	1600 Schrader	Hotel	168 rm	1.5 persons/rm	252	6
	1600 Schrader Blvd.	Restaurant	5,979 sf	0.003 person/sf	18	1
93.	Mixed-Use	Apartments	299 du	4 persons/du	1,196	25
	5939 W. Sunset Blvd.	Office	38,440 sf	0.004 person/sf	154	4
		Restaurant	5,064 sf	0.003 person/sf	16	1
		Retail	3,739 sf	0.003 person/sf	12	1
94.	Melrose & Beachwood	Apartments	52 du	_	_	_
	5570 W. Melrose Ave.	Commercial	5,500 sf	_	_	_
95.	Modera Argyle	Apartments	276 du	4 persons/du	1,104	23
	1546 N. Argyle Ave.	Retail	9,000 sf	0.003 person/sf	27	1
		Restaurant	15,000 sf	0.003 person/sf	45	1
96.	Montecito Senior Housing 6650 W. Franklin Ave.	Senior Apartments	68 du	4 persons/du	272	6
97.	The Chaplin Hotel Project	Hotel	93 rm	1.5 persons/rm	140	3
	7219 W. Sunset Blvd.	Restaurant	2,800 sf	0.003 person/sf	9	1

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes ^d
98.	Godfrey Hotel	Hotel	221 rm	1.5 persons/rm	332	7
	1400 N. Cahuenga Blvd.	Restaurant	3,000 sf	0.003 person/sf	9	1
99.	6140 Hollywood	Hotel	102 rm	1.5 persons/rm	153	4
	6140 Hollywood Blvd.	Condominiums	27 du	4 persons/du	108	3
		Restaurant	11,460 sf	0.003 person/sf	35	1
100.	Selma–Wilcox Hotel	Hotel	114 rm	1.5 persons/rm	171	4
	6421 W. Selma Ave.	Restaurant	1,993 sf	0.003 person/sf	6	1
101.	Apartments ^b 1601 N. Las Palmas Ave.	Apartments	86 du	4 persons/du	344	8
102.	1723 North Wilcox Residential	Apartments	68 du	4 persons/du	272	6
	1723 N. Wilcox Ave.	Retail	3,700 sf	0.003 person/sf	12	1
103.	Mixed-Use	Office	32,649 sf	0.004 person/sf	131	3
	1370 N. St. Andrews Pl.	Restaurant	3,646 sf	0.003 person/sf	11	1
		Conference/Private Dining Room ^e	633 sf	0.004 person/sf	3	1
		Outdoor Dining	9,520 sf	0.003 person/sf	29	1
104.	7445 Sunset Grocery 7445 W. Sunset Blvd.	Specialty Grocery	32,416 sf	0.003 person/sf	98	3
105.	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	1.5 persons/rm	234	5
106.	1276 North Western Avenue 1276 N. Western Ave.	Apartments	75 du	4 persons/du	300	7
107.	NBCUniversal Evolution Plan	Studio Office ^e	647,320 sf	0.004 person/sf	2,590	54
	100 Universal City Plaza	Office	495,406 sf	0.004 person/sf	1,982	42
		Entertainment Areae	337,895 sf	0.004 person/sf	1,352	29
		Entertainment Retail	39,216 sf	0.003 person/sf	118	3
		Hotel (900,000 sf) ^f	1,385 rm	1.5 persons/rm	2,077	44

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

No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes ^d
	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.				
Related Projects Service Population					93,126	2,051
Project Net Service Population					763	16
Total Related + Project Net					93,889	2,067
Related Projects Residential Service Population					52,720	1,125
Project Net Residential Service Population					793	16
Total Related + Project Net (Residential)					53,513	1,141

du = dwelling units

sf = square feet

rm = rooms

stu = students

N/A = No conversion factor available.

- = The related project is not located within the boundaries of the Hollywood Service Area; therefore, service population and crimes were not calculated.
- The related projects list represents the time of the Project's Notice of Preparation in May 2017. Since that time, a number of these projects have been cancelled or withdrawn. Specifically, Related Project No. 27 is not being built at this time as the EIR and entitlements were overturned in a court ruling; Related Project No. 41 has not been officially filed; Related Project No. 82 was denied September 22, 2017; and Related Project No. 101 was terminated on September 28, 2018. This analysis includes them which represents a conservative scenario.

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

N	No.b	Project Name/Address	Land Use	Unit/Area	Conversion Factor ^c	Service Population	Crimes ^d

- b Project number corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.
- ^c The following City of Los Angeles CEQA Thresholds Guide Police Service Population Conversion Factors were used: Residential (three-, four-bedroom units): 4 persons/unit (the highest rate available); Office: 4 persons/1,000 sf; Retail: 3 persons/1,000 sf; Hotel: 1.5 persons/room/day.
- The number of crimes is based on the crimes-per-capita rate observed in the Hollywood Community Police Station service area in 2019. Based on a service population of 300,000 for the Hollywood Community Police Station service area and 6,223 crimes committed during 2019, the crime rate is approximately 0.0207 crime per capita.
- d Information for this related project is not available.
- The L.A. CEQA Thresholds Guide does not provide a population factor for this type of land use. Therefore, the highest available rate for non-residential land uses (i.e. 4 persons per 1,000 square feet for office uses) is used.
- For police service population generation from lodging uses, a square footage rate of 650 square feet per room is applied. (J.A. deRoos, 2011, Planning and programming a hotel, http://scholarship.sha.cornell.edu/articles/310, retrieved January 10, 2020.)
- ^g The L.A. CEQA Thresholds Guide does not provide a police service population factor for schools. Therefore, the police service population is assumed to be equivalent to the number of students.
- ^h The L.A. CEQA Thresholds Guide does not provide a police service population factor for employees. Therefore, the police service population is assumed to be equivalent to the number of employees.
- The L.A. CEQA Thresholds Guide does not provide a police service population factor for amphitheaters. Therefore, the police service population is assumed to be equivalent to the number of seats.
- The L.A. CEQA Thresholds Guide does not provide a police service population factor for temporary housing. Therefore, the police service population is assumed to be equivalent to the number of beds.

Source: Eyestone Environmental, 2020.

additional 1,141 crimes per year. This degree of cumulative population growth could increase the demand for LAPD services in the Hollywood Area. However, of the 1,141 potential crimes per year, the Project's incremental contribution is only 16 crimes per year. 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 highly urbanized 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 currently serviced by one or more existing police stations. Therefore, the Project and related projects do not propose to introduce new populations into currently underserved areas necessitating a new facility. 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 protectionrelated goals, objectives, and policies set forth in the Framework Element, as listed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time.²⁹ In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative demand for police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

With regard to police emergency response, the Project, related projects, and other future development within the Hollywood Community Plan area would introduce new uses to the Project Site 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 Area, 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.

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²⁹ City of Los Angeles, Budget for the Fiscal Year 2017–18.

Based on the above, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. As such, Project impacts on would not be cumulatively considerable.

In addition, 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. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to police protection facilities would be less than significant.