

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 related to police protection facilities due to construction and operation of the Project. 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 Outreach and Development Division, in a letter dated May 31, 2020, which is included in Appendix J of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, laws, 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), the 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 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.

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 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, including police protection 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. Furthermore, 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. This information provides police departments a snapshot of crime activity in their jurisdiction and allows police managers to focus and develop plans to reduce crime in high crime areas.

(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.

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 City 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.

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

(c) Hollywood Community Plan

As discussed in Section IV.E, Land Use, of this Draft EIR, the Project is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, does not include any objectives or policies that specifically relate to police protection. However, there is general public facilities language under Programs, Public Improvements, Section 3, that states the development of other public facilities such as fire stations, libraries, and schools should be sequenced and timed to provide a balance between land use and public services at all times.

(d) LAPD Guidelines and Review

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

b. Existing Conditions

(1) LAPD Service Area and Bureaus

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley Bureau.³ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD's 21 community police stations.⁴ Each geographic bureau is comprised of four to five geographic area police stations.⁵ As of December 2019, the departmental staffing resources within the LAPD included 10,033 sworn officers.⁶

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.⁷

³ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed February 19, 2021.

⁴ LAPD, *Community Police Station Address Directory*, www.lapdonline.org/our_communities/content_basic_view/6279, accessed February 19, 2021.

⁵ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed February 19, 2021.

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

⁷ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed February 19, 2021.

The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles Divisions.⁸ The West Bureau also oversees the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.⁹ Within the West Bureau, the Project Site is located within the Hollywood Division.

(2) LAPD Community Police Station

Within the Hollywood Division, the Project Site is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 1.6 miles west of the Project Site.¹⁰ 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 13.34 square miles and consists of 35 reporting districts.¹¹ The Project Site is located within reporting district 0659, which is bounded by Western Avenue to the west, Sunset Boulevard to the north, Normandie Avenue to the east, and Fountain Avenue to the South. As of May 2020, the average response time to emergency calls for service in the Hollywood Division was 3.3 minutes, and the average response time for non-emergency calls was 32.3 minutes.¹²

Based on data provided by the LAPD Community Outreach and Development Division, the Hollywood Division includes a service population of approximately 165,000 persons and is staffed by approximately 381 sworn officers and 16 civilian support staff.¹³ As such, the Hollywood Division officer to resident ratio of approximately 2.3 officers per 1,000 residents. Thus, the officer-to-resident ratio is lower than the citywide ratio of 2.5 officers per 1,000 residents.

⁸ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed February 19, 2021.

⁹ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed February 19, 2021.

¹⁰ Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR. Distance reflects driving directions.

¹¹ Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR.

¹² Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR.

¹³ Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR.

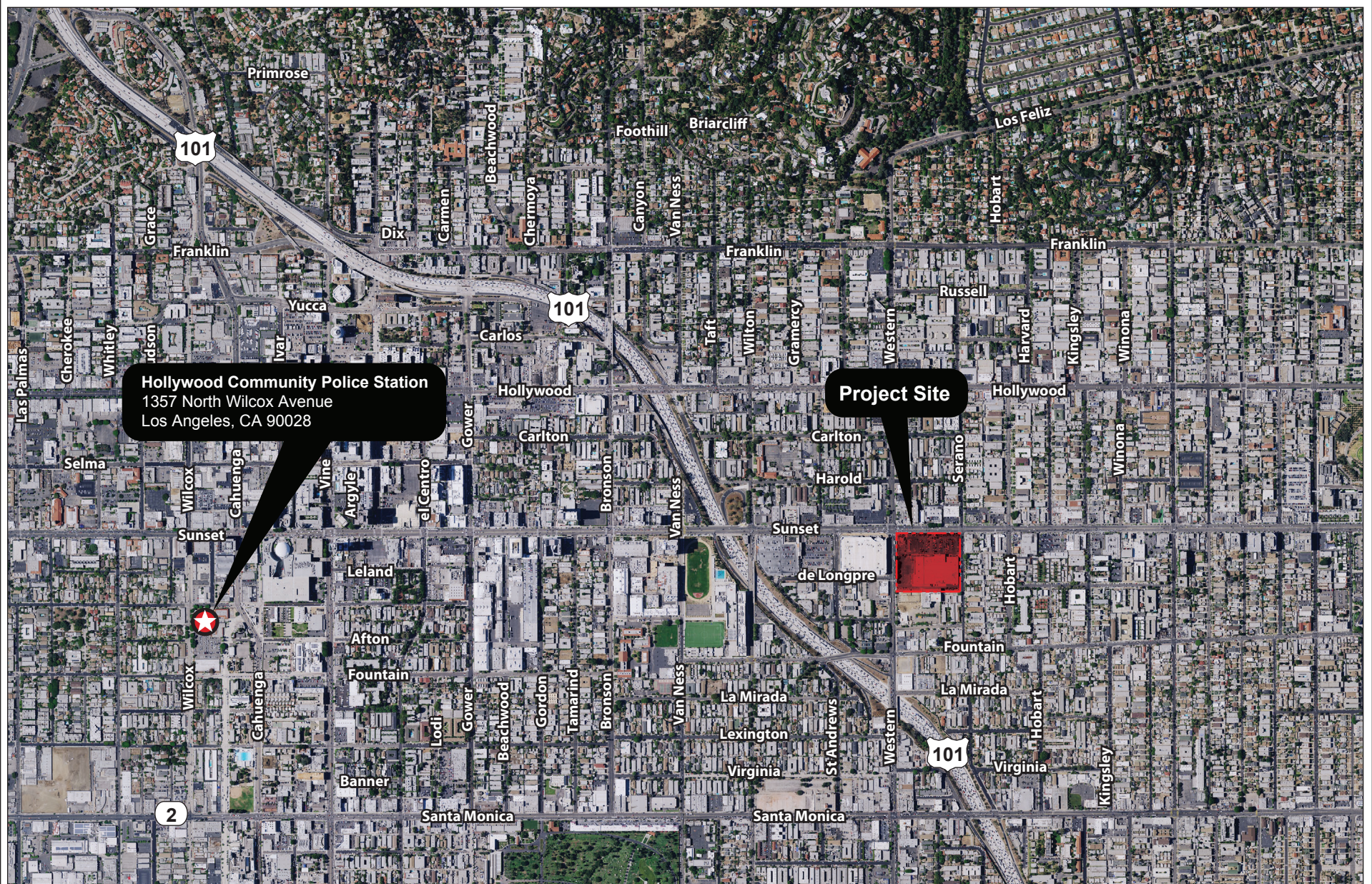


Figure IV.H.2-1
Police Station Serving the Project Site

(3) LAPD Crime Statistics

Table IV.H.2-1 on page IV.H.2-8 shows a comparison of the Hollywood Division and Citywide data regarding crimes reported by the LAPD based on only residential populations. As shown therein, based on the most recent complete year data made available from LAPD for the year 2019, approximately 6,816 crimes were reported within the Hollywood Division¹⁴ and 108,895 crimes were reported citywide.¹⁵ Based on the residential service population of the Hollywood Community Police Station, approximately 41.31 crimes per 1,000 residents¹⁶ (0.0207 crime per capita¹⁷) were reported in the Hollywood Division and 27.09 crimes per 1,000 residents¹⁸ (0.0271 crime per capita¹⁹) were experienced Citywide.

Based on the number of sworn officers staffing the Hollywood Community Police Station (381 sworn officers), the 2019 ratio of crimes per officer was 17.9 crimes per officer.²⁰ In comparison, the citywide (10,033 sworn officers) ratio is 10.85 crimes per officer.²¹ Thus, the Hollywood Division has a higher crime-per-officer ratio when compared to the City as a whole.

¹⁴ Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR.

¹⁵ Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR.

¹⁶ $(6,816 \text{ crimes} / 165,000 \text{ residents}) \times 1,000 = 41.31 \text{ crimes per } 1,000 \text{ residents}.$

¹⁷ $6,816 \text{ crimes} / 165,000 \text{ residents} = 0.0413 \text{ crime per capita}.$

¹⁸ $(108,895 \text{ crimes} / 4,020,438 \text{ residents}) \times 1,000 = 27.09 \text{ crimes per } 1,000 \text{ residents}.$

¹⁹ $108,895 \text{ crimes} / 4,020,438 \text{ residents} = 0.0271 \text{ crime per capita}.$

²⁰ $6,816 \text{ crimes} / 381 \text{ sworn officers} = 17.9 \text{ crimes per officer}.$

²¹ $108,895 \text{ crimes} / 10,033 \text{ sworn officers} = 10.85 \text{ crimes per officer}.$

**Table IV.H.2-1
2019 Crimes—Hollywood Division and Citywide**

	Crimes^a	Population	Crimes per 1,000 Persons	Crimes per Capita
Hollywood Division	6,816	165,000	41.31/1,000	0.0413
Citywide	108,895	4,020,438 ^b	27.09/1,000	0.0271

^a Crime data provided by LAPD includes homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, personal/other theft, and child/spousal abuse.

^b The 2019 City of Los Angeles population is based on a linear interpretation between 2016 and 2040 values from SCAG's 2020-2045 RTP/SCS.

Source: Written correspondence from Aaron C. Ponce, Community Outreach and Development Division, Los Angeles Police Department May 31, 2020. See Appendix J of this Draft EIR. LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19–12/28/19.

3. Project Impacts

a. Thresholds of Significance

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

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

In assessing impacts related to police protection services in this section, the City 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 City's *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, new or physically altered government facilities. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis presents statistical averages associated with the police station serving the Project Site and Citywide services and, based on guidance from the LAPD, focuses on the increase in the residential population from the Project. The determination of impacts on the capability of existing police services and personnel is based on the potential for the annual crimes per resident in the Hollywood Division to exceed current averages due to the addition of the Project.

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

There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event the City determines that expanded or new police facilities are warranted, 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 will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

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

- Installing and utilizing a 24-hour security camera network throughout the underground parking structures, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage shall be maintained for at least 30 days, and such footage shall be provided to the LAPD, as needed;
- Maintaining staff on-site, including at the lobby concierge desk. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed;
- Controlling access to all building elevators, residences, and resident-only common areas through an electronic key fob specific to each user;
- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property; and
- Maintaining unrestricted access to commercial/restaurant uses during business hours, with public access (except for authorized persons) prohibited after the businesses have closed.

Project Design Feature POL-PDF-3: The Project will 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 will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project will design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to 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 LAPD's Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project, including applicable features in LAPD's Design Out Crime Guidelines.

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require typical police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of the existing commercial uses on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant

would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be reduced, resulting in less demand for police protection services and associated government facilities.

Project construction activities could also potentially affect LAPD police protection services and response times within the Hollywood Division due to construction impacts on the surrounding roadways. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the Los Angeles Department of Transportation (LADOT) and may include 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, flag person, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. 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, with 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 proposes 735 residential dwelling units and up to 95,000 square feet of neighborhood-serving commercial 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 Division.

The Project Site is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 1.6 miles west of the Project Site. The Hollywood Community Police Station is staffed by 381 sworn officers and a 16-person civilian support staff. As discussed in Section IV.G, Population and Housing, of this Draft EIR, according to the 2018 American Community Survey, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.41 persons per unit.²² Applying this factor, development of the 735 residential units would result in a net increase of approximately 1,771 residents, which would increase the existing LAPD residential service population in the Hollywood Division from 165,000 to 166,771 persons.

As shown in Table IV.H.2-1 on page IV.H.2-8, approximately 6,816 crimes were reported in the Hollywood Division for 2019, which equates to a crime rate of 41.31 crimes per 1,000 residents. The Project would also include the development of 95,000 square feet of commercial uses which would result in 375 employees, a net increase of 35 employees over existing conditions (i.e., 340 employees).²³ Therefore, the Project's commercial service population could affect the number of crimes reported per year in the Hollywood Division.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed circuit camera system and keycard entry for the residential buildings and 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.

²² Based on a rate of 2.41 persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

²³ Based on the employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.

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 and POL-PDF-7, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. The Project's design features would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate.²⁴ Therefore, the Project's impact on police services would be less than significant.

The Project would introduce new uses to the Project Site, which would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion.

The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. Based on the above analysis, the Project 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.

Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the first responsibility of local

government where local officials have an obligation to give priority to the provision of adequate public safety services.

Therefore, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Impacts with regard to police protection would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

As discussed in Section III, Environmental Setting, of this Draft EIR, a total of 100 related projects are located in the vicinity of the Project Site. Of the 100 related projects, 81 of the related projects fall within the boundaries of the Hollywood Division. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. Additionally, the Hollywood Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2026, well before the Hollywood Community Plan Update's horizon year. Moreover, 2026 is a similar projected buildout year as many of the 100 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update upon its adoption.

(1) Impact Analysis

(a) Construction

In general, impacts to LAPD facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Should Project construction occur concurrently with related projects, specific coordination among these multiple construction sites would be required and implemented through the Project's construction management plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. The Project would not require substantial roadway closures that may be hazardous to roadway travelers. Similar to the Project, each related project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented during construction (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 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. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

(b) Operation

As shown in Table IV.H.2-2 on page IV.H.2-17, growth from the related projects that fall within the boundaries of the Hollywood Division is estimated to result in a police service population of approximately 52,986 persons, including permanent residents and daytime workers. When considering only residential population, the related projects are estimated to generate 28,570 residents. As such, the related projects' residential population plus the Project's 1,771 net new residents would result in an estimated increase of 30,341 residents in the Hollywood Division. Accordingly, the Hollywood Division police service population would increase from 165,000 residents to 195,341 residents, which would decrease the officer-to-resident from 2.3 officers per 1,000 residents²⁵ to 2.0 officers per 1,000 residents.²⁶

²⁵ $(381 \text{ officers} / 165,000 \text{ residents}) \times 1,000 = 2.3 \text{ officers per } 1,000 \text{ residents}$

²⁶ $(381 \text{ officers} / 195,341 \text{ residents}) \times 1,000 = 2.0 \text{ officers per } 1,000 \text{ residents}$

Table IV.H.2-2
Estimated Service Population from Related Projects within Hollywood Division

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
1.	Paseo Plaza Mixed-Use 5651 W. Santa Monica Blvd.	Condominiums	375 du	2.41 persons/du	904	38
		Retail	377,900 sf	2 persons/ksf	756	32
2.	BLVD 6200 Mixed-Use 6200 W. Hollywood Blvd.	Live/Work (JLWQ)	28 du	2.41 persons/du	68	3
		Apartments	1,014 du	2.41 persons/du	2,444	101
		Retail	175,000 sf	2 persons/ksf	350	15
3.	Sunset Bronson Studios 5800 W. Sunset Blvd.	Office	404,799 sf	4 persons/ksf	1,620	67
4.	Yucca Street Condos 6230 W. Yucca St.	Apartments	114 du	2.41 persons/du	275	12
		Commercial	2,697 sf	2 persons/ksf	6	1
5.	Hollywood 959 959 N. Seward St.	Office	241,568 sf	4 persons/ksf	967	40
6.	Archstone Hollywood Mixed-Use Project 6901–6911 W. Santa Monica Blvd.	Apartments	231 du	2.41 persons/du	557	24
		High-Turnover Restaurant	5,000 sf	4 persons/ksf	20	1
		General Retail	10,000 sf	2 persons/ksf	20	1
7.	Mixed-Use 5245 W. Santa Monica Blvd.	Apartments	49 du	2.41 persons/du	119	5
		Retail	32,272 sf	2 persons/ksf	65	3
8.	Selma Hotel 6417 W. Selma Ave.	Hotel	180 rm	0.5 persons/rm	90	4
		Restaurant	12,840 sf	4 persons/ksf	52	3
9.	Hollywood Production Center 1149 N. Gower St.	Apartments	57 du	2.41 persons/du	138	6
10.	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartments	220 du	2.41 persons/du	531	22
		Restaurant	3,270 sf	4 persons/ksf	14	1
11.	Pantages Theater Office 6225 W. Hollywood Blvd.	Office	210,000 sf	4 persons/ksf	840	35
12.	Selma & Vine Office Project 1601 N. Vine St.	Office	100,386 sf	4 persons/ksf	402	17
		Commercial	2,012 sf	2 persons/ksf	5	1

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
13.	Argyle Hotel Project 1800 N. Argyle Ave.	Hotel	225 rm	0.5 persons/rm	113	5
14.	Seward Street Office Project 956 N. Seward St.	Office	126,980 sf	4 persons/ksf	508	21
15.	Hotel & Restaurant Project 6381 W. Hollywood Blvd.	Hotel	80 rm	0.5 persons/rm	40	2
		Restaurant	15,290 sf	4 persons/ksf	62	3
16.	Television Center (TVC Expansion) 6300 W. Romaine St.	Office	114,725 sf	4 persons/ksf	459	19
		Gym ^e	40,927 sf	1 person/ksf	41	2
		Dance Studio ^e	38,072 sf	1 person/ksf	39	2
18.	Hollywood Center Studios Office 6601 W. Romaine St.	Office	106,125 sf	4 persons/ksf	425	18
19.	Selma Community Housing 1603 N. Cherokee Ave.	Apartments	66 du	2.41 persons/du	160	7
20.	Hudson Building 6523 W. Hollywood Blvd.	Restaurant	10,402 sf	4 persons/ksf	42	2
		Office	4,074 sf	4 persons/ksf	17	1
		Storage ^d	890 sf	0.33 persons/ksf	1	1
21.	Target Retail Shopping Center Project 5520 W. Sunset Blvd.	Discount Store	163,862 sf	2 persons/ksf	328	14
		Shopping Center	30,887 sf	2 persons/ksf	62	3
22.	Residential 712 N. Wilcox Ave.	Apartments	103 du	2.41 persons/du	249	11
23.	Mixed-Use 1600–1610 N. Highland Ave.	Apartments	248 du	2.41 persons/du	598	25
		Retail	12,785 sf	2 persons/ksf	26	2
24.	Millennium Hollywood Mixed-Use Project 1740 N. Vine St.	Apartments	1,005 du	2.41 persons/du	2,423	101
		Retail/Restaurant	30,176 sf	4 persons/ksf	121	5

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
25.	Paramount Pictures 5555 W. Melrose Ave.	Production Office	635,500 sf	4 persons/ksf	2,542	105
		Office	638,100 sf	4 persons/ksf	2,553	106
		Retail	89,200 sf	2 persons/ksf	179	8
		Stage ^f	21,000 sf	6.7 persons/ksf	141	6
		Support Uses ^f	1,900 sf	6.7 persons/ksf	13	1
26.	Apartments 1411 N. Highland Ave.	Apartments	76 du	2.41 persons/du	184	8
		Commercial	2,500 sf	2 persons/ksf	5	1
27.	Apartment Project 1824 N. Highland Ave.	Apartments	118 du	2.41 persons/du	285	12
28.	Hotel 1133 N. Vine St.	Hotel	112 rm	0.5 persons/rm	56	3
		Café	661 sf	4 persons/ksf	3	1
29.	The Lexington Mixed-Use 6677 W. Santa Monica Blvd.	Apartments	695 du	2.41 persons/du	1,675	70
		Commercial	24,900 sf	2 persons/ksf	50	3
30.	Columbia Square Mixed-Use 6121 W. Sunset Blvd.	Apartments	200 du	2.41 persons/du	482	20
		Office	422,610 sf	4 persons/ksf	1,691	70
		Retail/Restaurant	41,300 sf	4 persons/ksf	166	7
		Hotel	125 rm	0.5 persons/rm	63	3
31.	Mixed-Use (High Line West) 5550 W. Hollywood Blvd.	Apartments	280 du	2.41 persons/du	675	28
		Retail	12,030 sf	2 persons/ksf	25	2
33.	Las Palmas Residential (Hollywood Cherokee) 1718 N. Las Palmas Ave.	Residential	224 du	2.41 persons/du	540	23
		Retail	985 sf	2 persons/ksf	2	1
34.	Sunset & Vine Mixed-Use 1538 N. Vine St.	Apartments	306 du	2.41 persons/du	738	31
		Retail	68,000 sf	2 persons/ksf	136	6
35.	Condos & Retail 5663 Melrose Ave.	Condominiums	96 du	2.41 persons/du	232	10
		Retail	3,350 sf	2 persons/ksf	7	1
36.	6250 Sunset (Nickelodeon) 6250 W. Sunset Blvd.	Apartments	200 du	2.41 persons/du	482	20
		Retail	4,700 sf	2 persons/ksf	10	1

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
37.	Hollywood Central Park Hollywood Freeway (US-101)	Park ^e	625,086 sf	1 person/ksf	626	26
		Amphitheater	500 seats	0.02 persons/seat	10	1
		Inn	5 rm	0.5 persons/rm	3	1
		Community Center ^f	30,000 sf	6.7 persons/ksf	201	9
		Banquet Space ^f	15,000 sf	6.7 persons/ksf	101	5
		Commercial	29,000 sf	2 persons/ksf	58	3
		Low Income Apartment	15 du	2.41 persons/du	37	2
38.	Mixed-Use 5901 Sunset Blvd.	Office	274,000 sf	4 persons/ksf	1,096	46
		Supermarket	26,000 sf	4 persons/ksf	104	5
39.	John Anson Ford Theater 2580 Cahuenga Blvd. E.	Theater	311 seats	0.02 persons/seat	7	1
		Restaurant	5,400 sf	4 persons/ksf	22	1
		Office	30 emp		30	2
40.	1717 Bronson Avenue 1717 N. Bronson Ave.	Apartments	89 du	2.41 persons/du	215	9
41.	Sunset + Wilcox 1541 N. Wilcox Ave.	Hotel	200 rm	0.5 persons/rm	100	5
		Restaurant	9,000 sf	4 persons/ksf	36	2
42.	Mixed-Use 1350 N. Western Ave.	Apartments	200 du	2.41 persons/du	482	20
		Guest Rooms	4 rm	0.5 persons/rm	2	1
		Retail/Restaurant	5,500 sf	4 persons/ksf	22	1
43.	Palladium Residences 6201 W. Sunset Blvd.	Apartments	731 du	2.41 persons/du	1,762	73
		Retail/Restaurant	24,000 sf	4 persons/ksf	96	4
44.	5600 West Hollywood Boulevard 5600 W. Hollywood Blvd.	Apartments	33 du	2.41 persons/du	80	4
		Commercial	1,289 sf	2 persons/ksf	3	1
45.	5750 Hollywood 5750 Hollywood Blvd.	Apartments	161 du	2.41 persons/du	389	17
		Commercial	4,747 sf	2 persons/ksf	10	1
46.	2014 Residential 707 N. Cole Ave.	Apartments	84 du	2.41 persons/du	203	9

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
47.	Cahuenga Boulevard Hotel 1525 N. Cahuenga Blvd.	Hotel	64 rm	0.5 persons/rm	32	2
		Rooftop Restaurant/Lounge	700 sf	4 persons/ksf	3	1
		Restaurant	3,300 sf	4 persons/ksf	14	1
48.	Academy Square 1341 Vine St.	Office	285,719 sf	4 persons/ksf	1,143	48
		Apartments	200 du	2.41 persons/du	482	20
		Restaurant	16,135 sf	4 persons/ksf	65	3
49.	Hotel 1921 Wilcox Ave.	Hotel	122 rm	0.5 persons/rm	61	3
		Restaurant	4,225 sf	4 persons/ksf	17	1
50.	Mixed-Use 901 N. Vine St.	Apartments	70 du	2.41 persons/du	169	7
		Commercial	3,000 sf	2 persons/ksf	25	2
53.	Mixed-Use 1233 N. Highland Ave.	Apartments	72 du	2.41 persons/du	174	8
		Commercial	12,160 sf	2 persons/ksf	25	2
54.	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	2.41 persons/du	890	37
		Office	2,570 sf	4 persons/ksf	11	1
58.	TAO Restaurant 6421 W. Selma Ave.	Quality Restaurant	17,607 sf	4 persons/ksf	71	3
59.	Hollywood Crossroads 1540–1552 Highland Ave.	Residential	950 du	2.41 persons/du	2,290	95
		Hotel	308 rm	0.5 persons/rm	154	7
		Office	95,000 sf	4 persons/ksf	380	16
		Commercial/Retail	185,000 sf	2 persons/ksf	740	31
60.	Wilcox Hotel 1717 N. Wilcox Ave.	Hotel	133 rm	0.5 persons/ksf	67	3
		Retail	3,580 sf	2 persons/ksf	8	1
61.	Apartments 5460 W. Fountain Ave.	Apartments	75 du	2.41 persons/du	181	8
62.	Mixed-Use 6220 W. Yucca St.	Hotel	210 rm	0.5 persons/ksf	105	5
		Apartments	136 du	2.41 persons/du	328	14
		Restaurant	6,980 sf	2 persons/ksf	28	2

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
63.	SunWest Project (Mixed-Use) 5525 W. Sunset Blvd.	Apartments	293 du	2.41 persons/du	707	30
		Commercial	33,980 sf	2 persons/ksf	68	3
64.	Hollywood De Longpre Apartments 5632 De Longpre Ave.	Apartments	185 du	2.41 persons/du	446	19
65.	Ivar Gardens Hotel 6409 W. Sunset Blvd.	Hotel	275 rm	0.5 persons/rm	138	6
		Retail	1,900 sf	2 persons/ksf	4	1
66.	Selma Hotel 6516 W. Selma Ave.	Hotel	212 rm	0.5 persons/ksf	106	5
		Bar/Lounge	3,855 sf	4 persons/ksf	16	1
		Rooftop Bar/Event Space	8,500 sf	4 persons/ksf	34	2
67.	Mixed-Use 1657 N. Western Ave.	Apartments	91 du	2.41 persons/du	220	10
		Retail	15,300 sf	2 persons/ksf	31	2
68.	McCadden Campus (LGBT) 1118 N. McCadden Pl.	Housing	45 du	2.41 persons/du	109	5
		Social Service Support Facility	50,325 sf	4 persons/ksf	202	9
		Office	17,040 sf	4 persons/ksf	69	3
		Commercial Retail/Restaurant	1,885 sf	4 persons/ksf	8	1
		Temporary Housing	100 bed	1 person/bed	100	5
70.	citizenM Hotel 1718 Vine St.	Hotel	216 rm	0.5 persons/rm	108	5
		Restaurant	4,354 sf	4 persons/ksf	18	1
71.	Apartments 1749 Las Palmas Ave.	Apartments	70 du	2.41 persons/du	169	7
		Retail	3,117 sf	2 persons/ksf	7	1
72.	Mixed-Use 1868 N. Western Ave.	Apartments	96 du	2.41 persons/du	232	10
		Retail	5,546 sf	2 persons/ksf	12	1
73.	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	232 du	2.41 persons/du	560	24
		Restaurant	7,000 sf	4 persons/ksf	28	2

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
76.	6200 West Sunset Boulevard 6200 W. Sunset Blvd.	Apartments	270 du	2.41 persons/du	651	27
		Quality Restaurant	1,750 sf	4 persons/ksf	7	1
		Pharmacy	2,300 sf	2 persons/ksf	5	1
		Retail	8,070 sf	2 persons/ksf	17	1
77.	747 North Western Avenue 747 N. Western Ave.	Apartments	44 du	2.41 persons/du	107	5
		Retail	7,700 sf	2 persons/ksf	16	1
78.	6630 West Sunset Boulevard 6630 W. Sunset Blvd.	Apartments	40 du	2.41 persons/du	97	5
80.	Hollywood & Wilcox 6430–6440 W. Hollywood Blvd.	Apartments	260 du	2.41 persons/du	627	26
		Office	3,580 sf	4 persons/ksf	15	1
		Retail	11,020 sf	2 persons/ksf	23	1
		Restaurant	3,200 sf	4 persons/ksf	13	1
84.	Onni Group Mixed-Use Development 1360 N. Vine St.	Condominium	429 du	2.41 persons/du	1,034	43
		Grocery	55,000 sf	4 persons/ksf	220	10
		Retail	5,000 sf	2 persons/ksf	10	1
		Restaurant	8,988 sf	4 persons/ksf	36	2
85.	1600 Schrader 1600 Schrader Blvd.	Hotel	168 rm	0.5 persons/rm	84	4
		Restaurant	5,979 sf	4 persons/ksf	24	1
86.	Mixed-Use 5939 W. Sunset Blvd.	Apartments	299 du	2.41 persons/du	721	30
		Office	38,440 sf	4 persons/ksf	154	7
		Restaurant	5,064 sf	4 persons/ksf	21	1
		Retail	3,739 sf	2 persons/ksf	8	1
88.	Modera Argyle 1546 N. Argyle Ave.	Apartments	276 du	2.41 persons/du	666	28
		Retail	9,000 sf	2 persons/ksf	18	1
		Restaurant	15,000 sf	4 persons/ksf	60	3
89.	Montecito Senior Housing 6650 W. Franklin Ave.	Senior Apartments	68 du	2.41 persons/du	164	7

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

No.^a	Project Name/Address	Description	Unit/Area	Conversion Factor^{b,c}	Service Population	Crimes^d
90.	Godfrey Hotel 1400 N. Cahuenga Blvd.	Hotel	221 rm	0.5 persons/ksf	111	5
		Restaurant	3,000 sf	4 persons/ksf	12	1
91.	6140 Hollywood 6140 Hollywood Blvd.	Hotel	102 rm	0.5 persons/ksf	51	3
		Condominium	27 du	2.41 persons/du	66	3
		Restaurant	11,460 sf	4 persons/ksf	46	2
92.	Selma–Wilcox Hotel 6421 W. Selma Ave.	Hotel	114 rm	0.5 persons/ksf	57	3
		Restaurant	1,993 sf	4 persons/ksf	8	1
93.	Apartments 1601 N. Las Palmas Ave.	Apartments	86 du	2.41 persons/du	208	9
95.	1723 North Wilcox Residential 1723 N. Wilcox Ave.	Apartments	68 du	2.41 persons/du	164	7
		Retail	3,700 sf	2 persons/ksf	8	1
97.	1719 Whitley Hotel 1719 N. Whitley Ave.	Hotel	156 rm	0.5 persons/ksf	78	4
99.	1276 North Western Avenue 1276 N. Western Ave.	Apartments	75 du	2.41 persons/du	181	8
Related Projects Service Population					51,211	2,201
Project Net Service Population					1,769	73
Total Related + Project Net					52,980	2,274
Related Projects Residential Service Population					28,570	1,203
Project Net Residential Service Population					1,771	73
Total Related + Project Net (Residential)					30,341	1,276
<i>du = dwelling units</i> <i>emp = employees</i> <i>ksf = 1,000 square feet</i> <i>sf = square feet</i>						

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

No. ^a	Project Name/Address	Description	Unit/Area	Conversion Factor ^{b,c}	Service Population	Crimes ^d
<i>rm = rooms</i> <i>Related Project Nos. 17, 32, 51, 52, 55, 56, 57, 69, 74, 75, 79, 81, 82, 83, 87, 94, 96, 98, and 100 are not located within the boundaries of the Hollywood Division; therefore, service population and crimes were not calculated.</i> ^a <i>The project number corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.</i> ^b <i>Residential population is based on a rate of 2.41 persons per multi-family unit based on 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.</i> ^c <i>Number of employees is based on the employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i> ^d <i>The number of crimes is based on the crimes-per-capita rate observed in the Hollywood Division in 2019. Based on a service population of 165,000 for the Hollywood Division and 6,816 crimes committed during this timeframe, the crime rate is approximately 0.0413 crime per capita.</i> ^e <i>The VMT Calculator does not provide an employment generation factor for this type of land use. Therefore, the rate for the most similar use (i.e., 1 person per 1,000 square feet for Health Club) is used.</i> ^f <i>The VMT Calculator does not provide an employment generation factor for this type of use. Therefore, the highest available rate for non-residential land uses is used (i.e., 6.7 persons per 1,000 square feet) is used.</i> <i>Source: Eyestone Environmental, 2021.</i>						

The additional service population associated with the related projects and general growth in the Project vicinity would increase the demand for LAPD services in the Hollywood Division. This degree of cumulative population growth could increase the demand for LAPD services in the Hollywood Division. However, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-7 to reduce the demand for police protection services on the Project Site. Therefore, the Project's incremental impact is not cumulatively considerable.

Furthermore, the Project vicinity and general Hollywood Community Plan area are located within an urbanized area and it is assumed that each of the related projects identified, as well as other future development within the Hollywood Community Plan area would likewise be serviced by one or more existing police stations. Therefore, the Project and related projects do not propose to introduce new populations that would necessitate a new police facility. Specifically, as noted by the LAPD in its May 31, 2020, service letter included as Appendix J of this Draft EIR, the Project "...individually or combined with other past, present, or future projects, will not result in the need for new or altered police facilities." In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the 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.²⁷ 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.

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

²⁷ *City of Los Angeles, Budget for the Fiscal Year 2017–18.*

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 Division, and the Project would not contribute to a cumulative impact regarding emergency response. Furthermore, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with CVC Section 21806.

With regard to cumulative impacts on police protection, consistent with the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection services would be less than significant.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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