

IV. Environmental Impact Analysis

L.2 Public Services – Police Protection

1. Introduction

This section analyzes whether the Project would require new or physically altered police facilities to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated May 20, 2021, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix L-2 of this Draft EIR. Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a) Regulatory Framework

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

- California Vehicle Code Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management (OEM)
- City of Los Angeles General Plan, including:
 - Framework Element
 - Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- Los Angeles Police Department (LAPD) Computer Statistics Unit (COMPSTAT) Program
- Los Angeles Police Department Guidelines and Plan Review

(1) State

(a) *California Vehicle Code, Section 21806*

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.¹ This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety... (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(b) *California Constitution Article XIII, Section 35*

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

(c) *California Penal Code*

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority,

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.

rules of conduct, and training for peace officers. Under State law, all sworn municipal and county officers are state peace officers.

(2) Regional

The County of Los Angeles Office of Emergency Management (OEM), established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a Countywide basis.²

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

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Framework Element*

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

Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.L.2-1, *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies***, below. Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services, and includes the following relevant goals, objectives, and policies outlined below in Table X. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15

² County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed June 1, 2021.

requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

TABLE IV.L.2-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT INFRASTRUCTURE AND PUBLIC SERVICES GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 9I	Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.

SOURCE: City of Los Angeles, General Plan Framework Element, 2001.

(ii) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including

those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) provides one goal, one objective, and one policy regarding police protection as shown in **Table IV.L.2-2, Relevant Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Goals, Objectives, and Policies.**

**TABLE IV.L.2-2
RELEVANT SHERMAN OAKS-STUDIO CITY-TOLUCA LAKE-CAHUENGA PASS
COMMUNITY PLAN GOALS, OBJECTIVES, AND POLICIES**

Goal/Objective/Policy	Description
Goal 8	A community with adequate police facilities and services to protect the community's residents from criminal activity reduce the incidence of crime and provide other necessary law enforcement services.
Objective 8-1	To provide adequate police facilities and personnel to correspond with population and service demands.
Policy 8-1.1	Coordinate with the Police Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.
SOURCE: City of Los Angeles, Sherman Oaks-Studio City-Cahuenga Pass Community Plan, 1998.	

(b) City of Los Angeles Charter

City Charter Volume I, Article V, Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and State and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

(c) Administrative and Municipal Codes

Section 22.240 of the Administrative Code requires the LAPD to adhere to the State standards described in Section 13522 of the California Penal Code for the training of police dispatchers. Los Angeles Municipal Code (LAMC) Chapter 5 includes regulations, enforceable by the police, related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's fire, building, and health codes. The LAPD is also given the power and the duty to protect residents and property and to review and enforce specific security-related mitigation measures in regard to new development.

(d) *Los Angeles Police Department Computer Statistics Unit (COMPSTAT) Program*

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

(e) *LAPD Guidelines and Plan Review*

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

Provide on-site security personnel whose duties shall include but not be limited to the following:

- Monitoring entrances and exits;
- Managing and monitoring fire/life/safety systems;
- Controlling and monitoring activities in parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."

³ LAPD, COMPSTAT, http://www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed June 1, 2021.

b) Existing Conditions

(1) LAPD Service Areas and Bureaus

The LAPD provides police protection services in the City of Los Angeles, covering 472.93 square miles and includes 21 community police service areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. Each bureau is further defined by divisions and into reporting districts. The LAPD also has a variety of specialized units including Special Weapons and Tactics (SWAT), Off-Road Enforcement, Mounted Unit, Special Operations Support Division, Air Support Division, Art Theft Detail, K-9 Unit, Animal Cruelty Task Force, Gangs and Narcotics Division, and Specialized Enforcement Section (Motors and Commercial Enforcement).⁴

As of May 20, 2021, the departmental staffing resources within the LAPD include 9,905 sworn officers.⁵ Based on a total City population of 4,015,940,⁶ the LAPD currently has an officer-to-resident ratio of 2.47 officers for every 1,000 residents.⁷

The Project Site is located within the jurisdiction of the Valley Bureau, North Hollywood Community Police Station, of the LAPD. The Valley Bureau covers 226.47 square miles with a population of approximately 1,426,071 residents, and oversees operations in the communities of Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley, as well as Valley Traffic Division.⁸ The Valley Traffic Division is responsible for investigating traffic collisions and traffic-related crimes for all operations in the Valley Bureau. The Valley Bureau oversees operations at seven community police stations: the Devonshire Community Police Station, the Foothill Community Police Station, the Mission Community Police Station, the North Hollywood Community Police Station, the Topanga Community Police Station, the Van Nuys Community Police Station, and the West Valley Community Police Station.⁹ The North Hollywood Community Police Station serves the Project Site and is described in more detail below.

⁴ Los Angeles Police Department, Inside the LAPD, http://www.lapdonline.org/inside_the_lapd, accessed June 1, 2021.

⁵ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

⁶ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

⁷ $9,905 \text{ officers} / (4,015,940 \text{ residents} / 1,000) = 2.47 \text{ officers} / 1,000 \text{ residents}$

⁸ Los Angeles Police Department, About Valley Bureau, https://www.lapdonline.org/valley_bureau/content_basic_view/1921, accessed June 1, 2021.

⁹ Los Angeles Police Department, Valley Bureau Community Police Stations, https://www.lapdonline.org/valley_bureau/content_basic_view/1923, accessed June 1, 2021.

(2) LAPD North Hollywood Community Police Station

The Project Site is served by the North Hollywood Community Police Station,¹⁰ located at 11640 Burbank Boulevard, 2.03 miles northeast of the Project Site (as the crow flies), as shown in **Figure IV.L.2-1**, *Location of North Hollywood Community Police Station*. The North Hollywood Community Police Station's boundaries encompass 25 square miles (North Hollywood Community Area) and includes the communities of North Hollywood, Studio City, Valley Village, Toluca Lake, West Toluca Lake, and a portion of Sun Valley.¹¹ The approximate borders of its service area are Cantara Street, CA 170 Hollywood Freeway, Whitsett Avenue, Saticoy Street and Clybourn Avenue to the north; Griffith Park Boundary, Barham Boulevard, US 101 Hollywood Freeway and Mulholland Drive to the south; Clybourn Avenue, Sherman Way, Vineland Avenue, Ventura Subdivision MT2,¹² City of Burbank Boundary, Magnolia Boulevard, Ledge Avenue, West lark Avenue, Forest Lawn Drive and Los Angeles Park to the east; and Tujunga Wash Path, Victory Boulevard, Coldwater Canyon Avenue, Burbank Boulevard, Chandler Boulevard, Whitsett Avenue, US 101 Ventura Freeway, Moorpark Street, Fulton Avenue, Valleyheart Drive, and Mulholland Drive to the west.¹³

Based on the information provided by the LAPD, as of May 2021, the North Hollywood Community Police Station includes 262 sworn officers and 14 civilian support staff, who serve a population of approximately 220,000 persons plus.¹⁴

In the event a situation arises requiring increased staffing, additional officers can be called in from other LAPD area police stations (the other closest stations within the Valley Bureau being the Van Nuys Community Police Station, Mission Community Police Station, and the Foothill Area Los Angeles Community Police Station). As with all municipal police departments in Los Angeles County, the LAPD maintains mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard to provide adequate public safety in emergency situations and/or conditions of extreme peril.

¹⁰ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

¹¹ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

¹² MT = Main

¹³ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

¹⁴ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

The emergency response system of the North Hollywood Community Police Station is directly linked to the LAPD Communications Division's Dispatch Centers. The Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which 911 emergency calls for service are received (includes police, fire, and paramedic). According to the LAPD, the average response time to emergency, high priority calls for service in the North Hollywood Community Area was 4.3 minutes, as of May 2021. The average response time to medium high priority calls for service in the North Hollywood Community Area was 13.7 minutes, as of May 2021. The average response time to low priority, non-emergency calls for service in the North Hollywood Community Area was 31.7 minutes, as of May 2021.¹⁵

(3) LAPD Crime Statistics

Currently, 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, short for "computer statistics," is a multi-faceted system for managing police operations. COMPSTAT looks outwardly at crime and its effects in the community, while at the same time looking within the organization to identify best practices in managing police personnel and risk management issues.¹⁶ COMPSTAT has been shown to reduce crime occurrences in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.¹⁷

Table IV.L.2-3, *Population, Officer, and Crime Comparison (2020)*, lists the resident population, number of sworn officers, officer/resident ratio, and number of crimes for the North Hollywood Community Area and Citywide for year 2020, the latest data available. As reported therein, the officer to resident population ratios within the North Hollywood Community Area and Citywide are 1:840 and 1:402.

To help minimize crime throughout the City, numerous efforts have been implemented over recent years. According to the LAPD, these include, but are not necessarily limited to, training and deploying specially-trained officers assigned to LAPD's Metropolitan Division, who are flexibly deployed to rapidly respond to crime spikes and proactively prevent crimes throughout the City; increasing the number of Domestic Abuse Response Teams; expanding the Gang Reduction and Youth Development (GRYD) program to include twice as many GRYD zones that provide prevention and intervention services to at-risk youth; combining City and County efforts to reduce homelessness by increasing available housing and providing additional support services; and doubling the number of

¹⁵ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

¹⁶ Los Angeles Police Department, COMPSTAT Webpage, http://www.lapdonline.org/harbor_news/content_basic_view/6363, accessed June 1, 2021.

¹⁷ Los Angeles Police Department, COMPSTAT Plus, http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed June 1, 2021.

specially-trained teams of police officers and mental health professionals to respond to incidents involving a mental health crisis.¹⁸

**TABLE IV.L.2-3
POPULATION, OFFICER, AND CRIME COMPARISON (2020)**

Service Area	Square Miles	Resident Population	Sworn Officers	Residents: Officer Ratio	Annual Reported Crimes
North Hollywood Community Area	25 ^a	220,000 ^a	262	1:840 ^b	5,277 ^{a,d}
Citywide	472.9 ^d	4,015,940 ^a	9,905 ^a	1:402 ^{a,e}	101,069 ^{a,f}

^a Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

^b The LAPD letter provided in Appendix L-2 of this Draft EIR cites 262 sworn officers, a resident population of 220,000. Note that the residents/officer ratio of 663:1 provided in the LAPD letter has been updated to 840:1 ($220,000 \div 262 = 839.69$) to reflect the population and number of officers provided in the LAPD letter,

^c Violent Crimes (909) + Property Crimes (4,368) = 5,277 Total Crimes

^d LAPD, COMPSTAT Citywide Profile 04/25/21 to 05/22/21.

^e Note that the LAPD letter provided in Appendix L-2 of this Draft EIR cites that, Citywide, there are 9,905 sworn officers and a resident population of 4,015,940. The officer to resident ratio calculated using these numbers is 1:405, as compared to 1:402 (rounded) provided in the LAPD letter. This nominal difference is within typical expected ratio fluctuations that occur due to ongoing changes in LAPD staffing and Citywide resident populations.

^f Violent Crimes (24,553) + Property Crimes (76,516) = 101,069 Total Crimes

SOURCE: LAPD letter dated May 20, 2021; ESA, 2021.

Table IV.L.2-4 LAPD North Hollywood Community Area Crime Statistics (2020), summarizes the crime statistics for the North Hollywood Community Area from 2020 (the latest whole year for which annual crime data is available). As indicated therein, crimes in the North Hollywood Community Area totaled 5,277, with most of the crimes related to burglary theft from motor vehicle.¹⁹

(4) Existing Project Site

The Project Site is currently developed with the Weddington Golf & Tennis facility, which includes a nine-hole golf course, a putting green, tennis courts, a driving range, a 2,700-square-foot clubhouse with a 10-seat café, a 799-square-foot tennis shack, and associated surface parking area.

¹⁸ Los Angeles Police Department, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016.

¹⁹ Violent crimes = homicide, rape, robbery, aggravated assaults; Property crimes = burglary, motor vehicle, burglary theft from motor vehicle (BTFV), personal/other theft.

TABLE IV.L.2-4
LAPD NORTH HOLLYWOOD COMMUNITY AREA CRIME STATISTICS (2020)

	Number	Percent of Hollywood Community Area Crime ^a
Homicide	10	0%
Rape	47	1%
Robbery	228	4%
Aggravated Assault	624	12%
Burglary	724	4%
Motor Vehicle Theft	935	18%
Burglary Theft From Motor Vehicle	1561	30%
Personal/Other Theft	1148	22%
Total	5,277	100%

^a Percentages are rounded.

SOURCE: Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to police protection services 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, 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.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate police services impacts include:

- 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

The need for or deficiency in adequate police protection in and of itself is not a CEQA impact but, rather, a social and/or economic impact. Where a project causes a need for additional police protection 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 EIR. The ultimate determination of whether there is a significant impact related to police would result from the construction of new or expanded police protection. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1-acre in size, and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

The analysis of impacts on police protection addresses the Project's effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services and potential need for new or expanded police facilities. The analysis presents statistical data for the North Hollywood Community Area and Citywide, including the ratio of crimes to residents and the ratio of sworn police officers to residents. The ratio of police officers to residential population is used by LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for the Project.

The Project's police service population is project-specific and considers attendance at special events and typical visitors on the Project Site. As detailed further in Chapter II, *Project Description*, of the Draft EIR, attendance levels on the Project Site would vary throughout the week based on the activities and events taking place. The largest events would be limited to only a few days per year and be attended by up to 2,000 attendees. When accounting for the total number of persons to access/use the Project Site on a yearly basis and averaging them across 365 calendar days, there would be an average

of 1,955 persons per day on the Project Site.²⁰ Currently, there are approximately 1,022 weekday visitors and 2,044 weekend visitors to the Project Site.²¹ Thus, over the course of the year, the Harvard-Westlake-related uses and community/public use of the Project Site would increase the Project's Site's demand for police protection services compared to existing conditions.

Note that the LAPD does not provide police officer service ratios for non-residential uses and does not use such ratios to measure service levels. In consideration of the Project's increased use of the Project Site when compared to existing conditions, the Project's security and/or design features that would reduce the demand for police services, as well as occupation of the Project Site, was used to determine in the analysis below, whether the LAPD would require the addition of a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAPD was consulted and its responses were incorporated regarding the Project.

c) Project Design Features

(1) Construction

Refer to Project Design Feature TRAF-PDF-1 (Construction Traffic Management Plan) in Section IV.M, *Transportation*, of this Draft EIR. In addition, the following project design feature related to police protection services during Project construction will be implemented as part of the Project:

²⁰ The number of persons is derived from the average daily number of employees, students, spectators, and visitors anticipated to access/use the Project Site. To determine the average number of persons per day, the total number of persons visiting the Project Site during the calendar was determined, which consist of: (1) 106,044 persons associated with Harvard-Westlake activities (based on 2018-2019 data); (2) 585,468 community users (based on standard trip generation rates for a recreational community center and tennis courts from the Institute of Transportation Engineers); (3) 19,500 persons associated with Harvard-Westlake special events (30/year); and (4) 2,500 persons associated with public events (5/year). The total of these four categories = 713,512 persons per year. Thus, 713,512 persons per year divided by 365 days equals 1,955 persons per day. Of these 1,955 persons per day, approximately 82% are associated with community/public use and 18% are associated with Harvard-Westlake activities/events. See Appendix O-2 of this Draft EIR for detailed visitor calculations, which were used for solid waste generation purposes.

²¹ Weekday and weekend visitors account for the average number of visitors, as well as employees, for the entire Project Site, including the existing golf course, tennis courts, and café uses. Weekday visitors calculated based on traffic counts across a 24-hour weekday period. As part of the Transportation Assessment (see Appendix M of this Draft EIR), 511 vehicles visited the Project Site during a 24-hour weekday traffic count. Assuming an average vehicle occupancy of 2 people per vehicle, 1,022 visitors are assumed under weekday daily conditions. The average vehicle occupancy (AVO) of 2 is consistent with data from the *National Household Travel Survey* (Federal Highway Administration, 2017) for social/recreational trips. According to the current site operator, there are roughly twice as many visitors on weekends than during weekdays. Thus, 2,044 visitors are assumed for weekend daily conditions.

POL-PDF-1: Security Features During Construction. During construction, on-site security measures will include security lighting and a construction security fence with gated and locked entry around active construction areas.

(2) Operation

The following project design feature related to police protection services during Project operation will be implemented as part of the Project.

POL-PDF-2: Security Features During Operation. During operation, the Project will incorporate a security program to ensure the safety of its students, employees, and spectators, as well as public users of the Project Site. The Project's security will include, but not be limited to, the following design features:

- Construction of three security kiosks: (1) a security kiosk constructed south of the tennis courts; (2) a security kiosk located in the underground parking structure; and, (3) a security kiosk located in proximity to the roundabout and at-grade parking.
- Security personnel would be present onsite 24 hours per day every day of the year, and range in numbers from two to as many as ten guards depending on the time of day and number of scheduled activities.
 - One security person would be stationed at the underground garage security kiosk throughout business hours. Patrols would be conducted at random during each guard's eight-hour shift.
 - Security patrols present north of the Project Site on Valley Spring Lane during events to enforce no neighborhood or other off-site parking or visitor drop-off.
 - Security guard placed at the pedestrian entrance on Whitsett Avenue during larger events (i.e., days on which the number of event/game attendees is expected to be 300 or more for any individual game, or concurrent games combined) to screen visitors for neighborhood parking and to return visitors to their car if inappropriately parked.
- Lighting would be provided along all pathways, around the Project's gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. As required by LAMC Section 93.0117(b), exterior light sources would be designed such that they would not cause more than two foot-candles of lighting intensity or generate direct glare onto nearby sensitive uses (i.e., residential uses).
- North Hollywood Community Police Station would be provided with diagrams showing access to each portion of the Project Site.
- Installation of and monitoring of closed circuit television (CCTV) cameras.

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, 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?

(1) Impact Analysis

(a) Construction

During construction, equipment, building materials, vehicles, and temporary offices, would be temporarily located on the Project Site, which could be subject to theft or vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. This could result in an increase in demand for police protection services. Consequently, contractors typically take precautions to prevent trespassing through construction sites, such as installation of temporary fencing around the construction site to keep potential trespassers out and deployment of roving security guards to prevent problems during a project's construction. When such precautions are taken, there is less of a need for local law enforcement at the construction site.

The Project Site is easily accessed from the adjacent roadways. The Project Site would need to be secured during construction in order to avoid potential theft. Security lighting and fencing (refer to Project Design Feature POL-PDF-1), would be provided at the Project Site during construction, thereby reducing the potential need for LAPD services. Security measures would ensure that valuable materials (e.g., building supplies and metals, such as copper wiring), as well as construction equipment, are not easily stolen or abused. The specific type and combination of construction site security features would depend on the phase of construction. Implementation of these security features would minimize the Project's potential need for police protection services during the construction phase.

Emergency response vehicles can use a variety of options for navigating through traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. The Project would not require construction activities that would take place within the right-of-way, which would necessitate temporary lane, alley, or street closures for more than a day. Furthermore, emergency access would be maintained at all times as no road

closures would be necessary. Accordingly, impacts to police protection services would be less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD (refer to Project Design Feature TRAF-PDF-1 in Section IV.M, *Transportation*, of this Draft EIR);
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

A Construction Management Plan subject to review and approval by the City of Los Angeles Department of Transportation (LADOT) would be incorporated into the Project as provided in Project Design Feature TRAF-PDF-1, which would include street closure information, a detour plan, haul routes, and a staging plan, would be prepared and submitted to the City for review and approval and would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community.

As the Project would include fencing and security lighting, as part of Project Design Feature POL-PDF-1, no additional officers from LAPD would be needed to monitor the Project Site during construction outside of existing officers that already patrol the area. Any potential LAPD officers needed to patrol the Project Site would be from the existing officers at the North Hollywood Community Police Station. Additionally, the various safety and control features that would be implemented during Project construction would reduce the potential for incidents that would require police responses.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically-altered government facilities, need for new or physically-altered government 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. Therefore, impacts to police protection during Project construction would be less than significant.

(b) Operation

As discussed in Chapter II, *Project Description*, of this Draft EIR, the Project includes the development of athletic and recreational facilities for Harvard-Westlake students and employees, as well as the public. These facilities include a multi-purpose gymnasium, two fields and a pool with spectator seating and associated ancillary structures (e.g., locker and meetings rooms, restrooms, maintenance rooms, etc.), tennis courts, walkways and

paths, and associated surface and underground parking. As there are no proposed residential uses, the Project would only contribute to increasing the number of non-resident site users (e.g., students, employees, spectators, and visitors).

As discussed under Methodology above, the Project's police service population is project-specific and considers attendance at special events and typical visitors on the Project Site. Attendance levels on the Project Site would vary throughout the week based on the activities and events taking place. The largest events would be limited to only a few days per year and be attended by up to 2,000 attendees. When accounting for the total number of persons to access/use the Project Site on a yearly basis and averaging them across 365 calendar days, there would be an average of 1,955 persons per day on the Project Site (more than 80 percent of which is attributable to public uses). Currently, there are approximately 1,022 weekday visitors and 2,044 weekend visitors to the Project Site. Thus, over the course of the year, the Harvard-Westlake-related uses and community/public use of the Project Site would increase the Project's Site's demand for police protection services compared to existing conditions.

As discussed above, the Project Site is served by the North Hollywood Community Police Station. According to correspondence received from the LAPD, the North Hollywood Community Police Station has 262 sworn officers, 14 civilian staff, and a service population of approximately 220,000 people.²² This represents an officer-to-population ratio of approximately 1:840. However, it is noted that continual staffing changes and relocations within the LAPD results in a continually changing population/officer ratio at the North Hollywood Community Station and other stations throughout the City. As such, the population/officer ratio and sworn officers at individual stations is considered to be approximate. The Project does not propose any residential uses and would, therefore, not directly generate any new residential population in the North Hollywood Community Area. With the addition of the Project, the North Hollywood Community Area would continue to serve a population of 220,000 residents with 262 officers, thus maintaining the officer to resident population ratio of 1:840.

The City does not separately consider non-residential population increases when calculating increased demand for police services. Moreover, the Project's increased operational demand for police protection services would be offset as the result of the security services that would be provided on the Project Site as part of Project Design Feature POL-PDF-2. Per Project Design Feature POL-PDF-2, the Project will incorporate a security program to ensure the safety of its students, employees, public users, and spectators that will include a variety of design features, including the provision of three security kiosks; 24-hour, on-site security; and the installation and monitoring of CCTV cameras. Project Design Feature POL-PDF-2 also outlines the patrols that will be conducted on the Project Site by on-site security.

²² Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

According to the LAPD, there are no current plans to expand the North Hollywood Community Police Station or increase the number of personnel assigned to the North Hollywood Community Area.²³ Additionally, there are no special police protection requirements needed by law enforcement because of the specific attributes of this Project Site. Furthermore, LAPD has indicated that the Project would not result in the need for new or altered police facilities.²⁴

As previously discussed, the average emergency response time within the North Hollywood Community Area is 4.3 minutes for emergency calls, 13.7 minutes for medium high priority calls, and 31.7 minutes for low priority, non-emergency calls for service. Given this, along with reduced demand for police services as the result of on-site security personnel and design features, emergency response times within the North Hollywood Community Area are not expected to significantly increase under the Project and are expected to remain at or below current average response times. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternate routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area. Accordingly, Project operational impacts associated with emergency response times and emergency access would be less than significant.

Based on the above analysis, development of the Project is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. **Therefore, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered 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. Therefore, impacts to police protection during Project operation would be less than significant.**

(2) Mitigation Measures

Impacts regarding police protection services were determined to be less than significant. Therefore, no mitigation measures are required.

²³ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

²⁴ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

(3) Level of Significance After Mitigation

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

e) Cumulative Impacts

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, identifies five related projects that are anticipated to be developed in the Project vicinity. All five related projects would be served by the North Hollywood Community Police Station. The related projects in the North Hollywood Community Area include residential, commercial/retail, and other/mixed use uses.

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each project's respective environmental review process conducted by the City. Similar to the Project, each related project would be required to implement a construction traffic management plan to ensure that adequate emergency access to the property and neighboring properties is maintained. Related projects would also be required to implement similar security measures as under the Project to limit access to construction areas, such as installing construction fencing and gating and including security lighting. The specific type and combination of construction site security features would depend on the phase and duration of construction. The related projects would need to coordinate emergency accessibility with LAPD and/or LADOT, as necessary, to their respective sites to ensure that emergency access would be maintained through temporary lane closures or marked emergency access points. Construction-related traffic generated by the Project and related projects would not adversely affect LAPD service in the Project vicinity as drivers of police and 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.

(b) Operation

As discussed above, the related projects in the North Hollywood Community Area include residential, commercial/retail, and other/mixed use uses. **Table IV.L.2-5, *Cumulative Population for Police Services***, shows the estimated cumulative residential and non-residential populations for the related projects in the North Hollywood Community Area. As indicated in Table IV.L.2-5, the related projects would result in 1,274 residents and 629 non-residents.

**TABLE IV.L.2-5
CUMULATIVE POPULATION FOR POLICE SERVICES**

Land Use	Amount of Development and Type	Generation Factor (population per unit)^a	Residential Population	Employees (Jobs)
Related Projects				
12833 Ventura Boulevard	91.466 ksf health club and restaurants	4 persons/ksf ^b	—	366
12548 Ventura Boulevard	10.747 ksf retail	2 persons/ksf	—	21
	62 apartments	2.25 persons/unit	140	—
	1.925 ksf other ^b	4 persons/ksf	—	8
12582 Ventura Boulevard	15.7 ksf other ^b	4 persons/ksf	—	63
12544 Ventura Boulevard	12.782 ksf other ^b	4 persons/ksf	—	51
12833 Ventura Boulevard	504 apartments	2.25 persons/unit	1,134	—
	30.0 ksf restaurant	4 persons/ksf	—	120
Total Related Projects			1,274	629

du = dwelling units; ksf = 1,000 square feet

^a The generation factors are based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

^b Unknown or “other” uses are located within Ventura Boulevard commercial zones. Since specific uses are undetermined and the mix of commercial uses could include retail (2 persons/ksf) or high turn-over, sit-down restaurants (4 persons/ksf), the higher generator factor is assumed for the purpose of the evaluation.

SOURCE: ESA, 2022.

The related projects’ North Hollywood Community Police Station service area is served by 262 officers. The 1,274 new residents generated by the related projects would result in a population increase to 221,274 residents, thus increasing the residents/officer ratio. Maintaining the existing residents/officer ratio of 840:1 would require an additional two officers.²⁵ The Project, with no new residents, would not affect the officer-to-resident ratio. Nonetheless, the Project, together with related projects, would cumulatively generate increased demand for police protection services from the North Hollywood Community Police Station compared to existing conditions. It is also acknowledged that the related projects population is conservative since the projections do not account for related projects that do not proceed beyond the application phase or ultimately are not built. The projections also do not consider the reduction in criminal activity that is likely to occur as a result of development of the related projects as the related projects would seek to

²⁵ 220,000 existing residents +1,274 new residents = 221,274 residents/262 existing officers = 844:1; 221,274 residents/263 officers (one additional officer) = 841.3:1; and 221,274 residents/264 officers (two additional officers) =838.2:1.

activate their frontages and increase the amount of activity around their respective sites. The commercial related projects, such as those with commercial/retail would also be expected to provide on-site security, personnel, and/or design features for their visitors and patrons.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the North Hollywood Community Area. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, related projects are anticipated to include design features and mitigation measures, if appropriate, that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for navigating through traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with CVC Section 21806. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Additionally, the Project and the related projects would contribute revenue to the City's General Fund, which could fund LAPD expenditures, as necessary, to offset the cumulative incremental impact on police services. Through this process, LAPD would be able to provide adequate facilities to accommodate future growth and maintain acceptable levels of service. Additional increased demands for LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding), to which both the Project and related projects would contribute. Furthermore, LAPD has confirmed that the Project, individually or combined with past, present or future projects, would not result in the need for new or altered police facilities.²⁶

With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. As stated in Section 35 at subdivision (a)(2): "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."

Through the City's regular budgeting efforts, LAPD's resource needs, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time, as appropriate.²⁷ 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 this Project and other projects in the service area. If LAPD determines that new

²⁶ Michel R. Moore, Chief of Police; Alfonso Velasco, Officer, LAPD Office of Operations Public Engagement Section, dated May 20, 2021. Provided in Appendix L-2 of this Draft EIR.

²⁷ City of Los Angeles, City Administrative Officer, Budget and Financial Information, *2021-22 Proposed Budget, Detailed Department Proposals*. Available at: <https://cao.lacity.org/Budget/index.htm>. Accessed February 2, 2022.

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 typically 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.

Based on the above, the Project's contribution to cumulative impacts associated with the provision of new or physically altered police facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding police protection services were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

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