

## **IV. Environmental Impact Analysis**

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

#### **1. Introduction**

This section analyzes whether the Project's new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated January 14, 2021, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix H of this Draft EIR. Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

#### **2. Environmental Setting**

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

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

- California Vehicle Code, 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
  - Hollywood Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes

- Los Angeles Police Department (LAPD) Computer Statistics Unit (COMPSTAT) Program

### (1) State

#### (a) *California Vehicle Code, Section 21806*

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

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

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

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35 at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” In *City of Hayward v.*

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<sup>1</sup> A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

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

**(2) Regional**

*(a) County of Los Angeles Office of Emergency Management*

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

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

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<sup>2</sup> *County of Los Angeles Chief Executive Office, Office of Emergency Management, About Emergency Management*, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed October 27, 2021.

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.H.2-1 on page IV.H.2-5. 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 IV.H.2-1. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

#### *(ii) Hollywood 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.

As discussed in Section IV.F, Land Use and Planning, Use and Planning, of this Draft EIR, the Project is located within the Hollywood Community Plan area.<sup>3</sup> 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

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<sup>3</sup> *The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update. Information on the update can be accessed at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>*

**Table IV.H.2-1**  
**Relevant General Plan Police Protection Goals, Objectives, and Policies—Framework Element:**  
**Chapter 9, Infrastructure and Public Services**

Goal 9I	Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.
<hr/> <i>Source: City of Los Angeles, 2001.</i>	

development of other public facilities such as fire stations, libraries, and schools should be sequenced and timed to provide a balance between land use and public services at all times.

*(b) The City of Los Angeles Charter*

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

*(c) Administrative and Municipal Codes*

Section 22.240 of the Administrative Code requires the LAPD to adhere to the State standards described in Section 13522 of the California Penal Code for the training of police dispatchers. Los Angeles Municipal Code (LAMC) Chapter 5 includes regulations, enforceable by the police, related to 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 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.<sup>4</sup>

(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;

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<sup>4</sup> LAPD, COMPSTAT, [www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/](http://www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/), accessed October 27, 2021.

- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

## **b. Existing Conditions**

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

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

As of January 2021, the departmental staffing resources within the LAPD included 10,260 sworn officers and 3,178 civilian employees. Based on a total City population of 4,015,940, the LAPD currently has an officer-to-resident ratio of approximately one officer for every 391.4 residents, or 2.6 officers per 1,000 residents.<sup>8</sup>

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents.<sup>9</sup>

<sup>5</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/contact\\_us/content\\_basic\\_view/1063](http://www.lapdonline.org/contact_us/content_basic_view/1063), accessed October 27, 2021.

<sup>6</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/contact\\_us/content\\_basic\\_view/1063](http://www.lapdonline.org/contact_us/content_basic_view/1063), accessed October 27, 2021.

<sup>7</sup> LAPD, *LAPD Organization Chart*, [www.lapdonline.org/contact\\_us/content\\_basic\\_view/1063](http://www.lapdonline.org/contact_us/content_basic_view/1063), accessed October 27, 2021.

<sup>8</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR. The correspondence indicated an officer-to-resident ratio of 401.9. That ratio has been corrected herein ( $4,015,940 \text{ residents} \div 10,260 \text{ sworn officers} = 391.4$ )

<sup>9</sup> LAPD, *West Bureau*, [www.lapdonline.org/lapd-contact/west-bureau/](http://www.lapdonline.org/lapd-contact/west-bureau/), accessed October 27, 2021.

The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, and West Los Angeles, as well as the West Traffic Division.<sup>10</sup> The West Bureau is bordered by Forest Lawn Drive to the north, Normandie Boulevard to the east, El Segundo Boulevard to the south, and the Pacific Ocean to the west.<sup>11</sup> The Project Site is located in the Hollywood Division of the West Bureau.

## (2) LAPD Community Police Station

Within the Hollywood Division, the Project Site is served by the Hollywood Community Police Station. As shown in Figure IV.H.2-1 on page IV.H.2-9, the Hollywood Community Police Station is located at 1358 North Wilcox Avenue, approximately 0.35 mile southwest of the Project Site.<sup>12</sup> The Hollywood Community Police Station has a service area of approximately 17.2 square miles and consists of 35 reporting districts.<sup>13</sup> The Project Site is located within reporting district 0646, which is bounded by Highland Avenue to the west, Hollywood Boulevard to the north, Vine Street and Seward Street to the east, and Sunset Boulevard and Fountain Avenue to the south.

Based on data made available by the LAPD Community Outreach and Development Division, the Hollywood Division includes a service population of approximately 165,000 persons and is staffed by approximately 387 sworn officers and 15 civilian support staff.<sup>14</sup> As such, the Hollywood Division officer-to-resident ratio is one officer for every 426.4 residents, or 2.3 officers per 1,000 residents.<sup>15</sup> Thus, the officer-to-resident ratio is higher than the Citywide ratio of one officer for every 391.4 residents, or 2.6 officers per 1,000 residents.

<sup>10</sup> LAPD, West Bureau, [www.lapdonline.org/lapd-contact/west-bureau/](http://www.lapdonline.org/lapd-contact/west-bureau/), accessed October 27, 2021.

<sup>11</sup> LAPD, West Bureau, [www.lapdonline.org/lapd-contact/west-bureau/](http://www.lapdonline.org/lapd-contact/west-bureau/), accessed October 27, 2021.

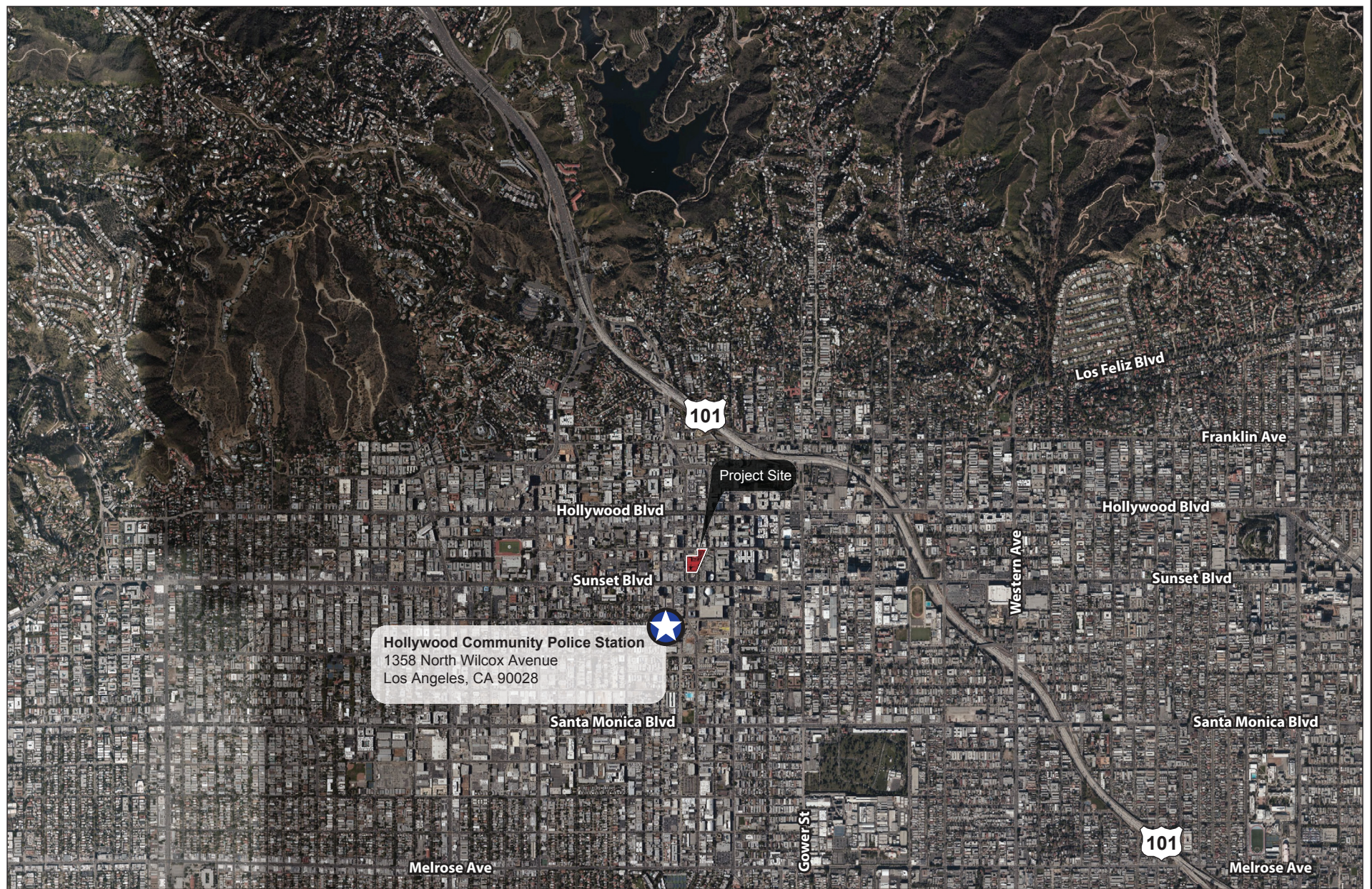
<sup>12</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

<sup>13</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

<sup>14</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

<sup>15</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.





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



As of December 2020, based on a four-week period from December 4, 2020, through December 31, 2020, the average response time in the Hollywood Division was 3.8 minutes for emergency calls and 29.4 minutes for non-emergency calls.<sup>16</sup> The average response time Citywide during the same four-week period was 4.4 minutes for emergency calls and 28.8 minutes for non-emergency calls.

### (3) LAPD Crime Statistics

Table IV.H.2-2 on page IV.H.2-11 provides a comparison of the Hollywood Division and Citywide data regarding crimes reported by the LAPD based on residential populations. As shown therein, based on the most recent data made available by the LAPD for 2020 (January through November<sup>17</sup>), approximately 4,377 crimes were reported within the Hollywood Division and approximately 87,691 crimes were reported Citywide.<sup>18</sup> Based on the residential service population of the Hollywood Community Police Station, approximately 26.53 crimes per 1,000 residents<sup>19</sup> (0.0265 crime per capita<sup>20</sup>) were reported in the Hollywood Division and 21.82 crimes per 1,000 residents<sup>21</sup> (0.0218 crime per capita<sup>22</sup>) were experienced Citywide between January 2020 and November 2020.

Based on the number of sworn officers staffing the Hollywood Community Police Station (387 sworn officers), the 2020 (January through November) ratio of crimes per officer was 11.3 crimes per officer.<sup>23</sup> In comparison, the Citywide (10,260 sworn officers) ratio is 8.5 crimes per officer.<sup>24</sup> Thus, the Hollywood Division has a higher crime-per-officer ratio when compared to the City as a whole.

<sup>16</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

<sup>17</sup> LAPD provided Hollywood Division crime information through December 2020, but Citywide crime data was only provided through November 2020. Thus, for consistency, Citywide and Hollywood Division crime data from January 2020 through November 2020 was used.

<sup>18</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

<sup>19</sup>  $(4,377 \text{ crimes} / 165,000 \text{ residents}) \times 1,000 = 26.53 \text{ crimes per } 1,000 \text{ residents}.$

<sup>20</sup>  $4,377 \text{ crimes} / 165,000 \text{ residents} = 0.0265 \text{ crime per capita}.$

<sup>21</sup>  $(87,691 \text{ crimes} / 4,015,940 \text{ residents}) \times 1,000 = 21.82 \text{ crimes per } 1,000 \text{ residents}.$

<sup>22</sup>  $87,691 \text{ crimes} / 4,015,940 \text{ residents} = 0.0218 \text{ crime per capita}.$

<sup>23</sup>  $4,377 \text{ crimes} / 387 \text{ sworn officers} = 11.3 \text{ crimes per officer}.$

<sup>24</sup>  $87,691 \text{ crimes} / 10,260 \text{ sworn officers} = 8.5 \text{ crimes per officer}.$

**Table IV.H.2-2  
2020 Crimes—Hollywood Division and Citywide**

	<b>Crimes<sup>a</sup></b>	<b>Population</b>	<b>Crimes per 1,000 Persons</b>	<b>Crimes per Capita</b>
Hollywood Division	4,377 <sup>b</sup>	165,000	26.53/1,000	0.0265
Citywide	87,691	4,015,940	21.82/1,000	0.0218
<p><sup>a</sup> Crime data is from January 2020 through November 2020 provided by LAPD and includes homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft.</p> <p><sup>b</sup> Hollywood Division data was provided through December 2020 and Citywide data was provided through November 2020. When using data from the entire calendar year (January 2020 through December 2020), there were a total of 4,764 crimes in the Hollywood Division, which equates to 28.87 crimes per 1,000 persons and a crimes-per-capita rate of 0.0289. For consistency purposes, the data included in the table is used throughout this section of the Draft EIR.</p> <p>Source: Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.</p>				

### 3. Project Impacts

#### a. Thresholds of Significance

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

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

In assessing impacts related to police protection services in this section, the City used Appendix G as the thresholds of significance. The factors identified below from the City's 2006 *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds. Specifically, the *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors to evaluate police protection:

- 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. Project design features that would reduce the impact of the Project on police services are also described.

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 be reviewed in a Mitigated Negative Declaration.

## c. Project Design Features

The following Project Design Features are proposed to increase Project Site security and minimize the Project's demand for police protection services:

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

## d. Analysis of Project Impacts

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

### (1) Impact Analysis

#### *(a) Construction*

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. 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.

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 narrowing lanes adjacent to the Project Site and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the Project Site vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

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

*(b) Operation*

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes 270 multi-family residential dwelling units and up to 6,790 square feet of ground floor commercial space, including restaurant and retail uses. In addition, the Project assumes that 4,000 square feet of space within the existing commercial uses that has been vacant since prior to 2018 would be occupied by a high-turnover restaurant. As such, 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. As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. However, in addition to the Project's residential population, this analysis considers the Project's daytime employee population to provide a conservative analysis of Project-level impacts.

As discussed above, the Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, approximately 0.35 mile southwest of the Project Site. The Hollywood Community Police Station is staffed by 387 sworn officers and a 15-person civilian support staff. As shown in Table IV.H.2-3 on page IV.H.2-16, the Project's estimated net police service population would be 675 persons, including permanent residents and daytime workers. Of this total, the Project would generate approximately 632 permanent residents, which would increase the existing LAPD residential service population in the Hollywood Division from approximately 165,000 persons to approximately 165,632 persons. With the increase in the police service population, the officer-to-resident ratio for the Hollywood Division would be reduced from approximately one officer for every 426.4 residents to approximately one officer for every 428 residents.<sup>25</sup> When considering the net daytime population of 675 persons (632 residents plus 43 daytime workers), the ratio would remain at one officer for every 428 persons.<sup>26</sup> This ratio would continue to be higher than the Citywide ratio of one officer for every 391.4 residents. However, the Project would not cause a substantial change in the officer-to-resident ratio for the Hollywood Division.

As shown Table IV.H.2-2 on page IV.H.2-11, 4,377 crimes were reported in the Hollywood Division in from January 2020 through November 2020, which equates to a crime rate of 0.0265 crime per capita. Based on the assumption that the annual crime rate would remain constant, the Project's net residential service population of 632 residents could potentially generate approximately 16.7 new crimes per year.<sup>27</sup> This would increase the annual number of crimes reported in the Hollywood Division from 4,377 to 4,393.7 reported crimes per year, an increase of approximately 0.38 percent.<sup>28</sup>

<sup>25</sup>  $165,632 \text{ residents} \div 387 \text{ officers} = 427.98 \text{ officer per resident} = 1 \text{ officer for every } 428 \text{ residents}.$

<sup>26</sup>  $165,675 \text{ total daytime population} \div 387 \text{ officers per person} = 428.10 \text{ officers per person} = 1 \text{ officer for every } 428 \text{ persons}.$

<sup>27</sup>  $\text{Total crimes generated by the Project's residential population} = \text{estimated crime rate of } 0.0265 \text{ crime per capita} \times \text{net Project residential service population of } 632 \text{ persons} = \text{approximately } 17 \text{ crimes}.$

<sup>28</sup>  $((4,393.7 - 4,377) / 4,377) \times 100 = 0.38\%$

**Table IV.H.2-3  
Estimated Police Service Population for the Project Site**

Land Use	Units	Conversion Factor <sup>a</sup>	Total Police Service Population
<b>Existing</b>			
Surface Parking Lot	32.129 ksf	0 per/ksf	0
<b>Proposed</b>			
Residential			
Multi-Family Residential	243 du	2.25 per du	547
Affordable Housing	27 du	3.14 per du	85
<b>Subtotal Residential</b>			<b>632</b>
Commercial			
Commercial (New) <sup>b</sup>	6.790 ksf	4 per ksf	27
High-Turnover Restaurant (Vacant) <sup>b</sup>	4.0 ksf	4 per ksf	16
<b>Subtotal Commercial</b>			<b>43</b>
<b>Total Project Net Police Service Population</b>			<b>675</b>
<p><i>du = dwelling units</i>  <i>ksf = 1,000 square feet</i>  <i>per = persons</i></p> <p><sup>a</sup> Population/Jobs are based on a rate of 2.25 persons per du for multi-family residential; 3.14 persons per du for affordable housing—family; and 4 persons per 1,000 sf for high-turnover restaurant uses, included in the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.</p> <p><sup>b</sup> This analysis conservatively assumes that all of the proposed commercial space and the existing commercial space that has been vacant since prior to 2018 would be occupied by high-turnover restaurant uses (the conversion factor for commercial space is 2 per 1,000 sf).</p> <p>Source: Eyestone Environmental, 2021.</p>			

The Project's commercial uses would result in approximately 43 additional daytime employees.<sup>29</sup> Based on the assumption that the annual crime rate would remain constant at 0.0295 crime per capita, the Project's employees could potentially generate approximately 1.1 additional crimes per year, for a total of 17.8 crimes per year.<sup>30</sup> Along with the permanent residential population, the annual number of crimes reported in the

<sup>29</sup> Based on the employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, and conservatively assuming that all new and currently vacant commercial space would be occupied by high-turnover restaurant uses.

<sup>30</sup> Total crimes generated by the Project's daytime worker population = estimated crime rate of 0.0265 crimes per capita x net increase in daytime worker population of 43 persons = 1.14 crimes. Total crimes generated by the net Project population (634 residents + 43 daytime workers) = 675 x 0.0265 = approximately 17.8 crimes.



Hollywood Division could increase from 4,377 to 4,394.8 reported crimes per year, an increase of 0.41 percent.<sup>31</sup>

As provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed-circuit camera system and keycard entry for the residential uses and resident parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of the building and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building. The Project would also design entrances to, and exits from, the building and open spaces areas, to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Feature POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site showing access routes and other information that might facilitate police response. The Project's design features, would help offset the Project-related increase in demand for police services. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features as well as the Project's contribution to the General Fund would help offset the Project-related increase in demand for police services. In addition, as previously discussed, the Project (including residential and daytime populations) could result in an approximately 0.41 percent increase in crimes in the Hollywood Division, which would not require new or expanded police services or facilities. **Therefore, the Project's impact on police services would be less than significant.**

The Project would introduce new uses to the Project Site that 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. In addition, operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access

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<sup>31</sup>  $((4,394.8 - 4,377) / 4,377) \times 100 = 0.41 \text{ percent}$

within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. **Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion. Thus, the Project would cause an adverse impact on emergency response and impacts would be less than significant.**

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. Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, based on the above analysis, the Project would not generate a demand for new LAPD facilities to serve the Project Site and, therefore, LAPD concluded the Project “will not result in the need for new or altered police facilities.”<sup>32</sup> **Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts.**

**Overall, 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. Thus, impacts with regard to police protection services and facilities would be less than significant.**

## (2) Mitigation Measures

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

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<sup>32</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

### (3) Level of Significance After Mitigation

Project-level impacts related to police protection services and facilities 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**

Cumulative growth in the Project area through 2025 (the Project's anticipated buildout year), includes specific known development projects as well as general ambient growth projected to occur. As discussed in Section III, Environmental Setting, of this Draft EIR, there are 46 related projects in the vicinity of the Project Site. A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft EIR. The growth reflected by Related Projects 1 through 46 is a conservative assumption, as some of the related projects may not be built out by 2025, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City and will be incorporated into the Hollywood Community Plan Update, which the Department of City Planning is in the process of preparing (referenced for information purposes only, as it is not an adopted plan). All of the 46 related projects fall within the boundaries of the Hollywood Division, and 27 include residential uses.<sup>33</sup>

### (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 each development's construction traffic management plan, as developed in consultation with LADOT, 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. In addition, 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 to reduce potential impacts to police protection services. Furthermore, the Project vicinity and general Hollywood Community Plan area are urbanized areas, and it is assumed that each of the related projects identified, as well as other future development within the Hollywood

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<sup>33</sup> As previously stated, when calculating service ratios, LAPD considers only the residential service population of the service area.

Community Plan area, would likewise be serviced by one or more existing police stations. In addition, given the short-term and intermittent nature of construction activities, construction-related traffic generated by the Project and the related projects would not significantly impact LAPD response times within the Project Site vicinity as drivers of police vehicles have the ability to avoid traffic, pursuant to CVC Section 21806. **Therefore, the Project's contribution to cumulative impacts on police protection services and facilities during construction would not be cumulatively considerable and cumulative impacts would be less than significant.**

*(b) Operation*

As shown in Table IV.H.2-4 on page IV.H.2-21, the residential component of related projects that would be served by the Hollywood Community Police Station would generate approximately 13,457 residents. As described above, the Project would contribute to the cumulative increase by generating a maximum net residential service population of approximately 632 residents. As such, the related projects' residential population of 13,457 plus the Project's 632 new residents would result in an estimated increase of 14,089 residents in the Hollywood Division. Accordingly, the Hollywood Division residential police service population would increase from approximately 165,000 to approximately 179,089 residents, which would reduce the officer-to-resident ratio from the current ratio one officer for every 426.4 residents (or 2.35 officers per 1,000 residents to one officer for every 462.7 residents (or 2.16 officers per 1,000 residents).<sup>34</sup>

The additional residential service population associated with the Project together with the related projects would likewise have an effect on crime in the Hollywood Division, which could increase based on per capita crime rates. Accordingly, cumulative growth could increase the demand for LAPD services in the Hollywood Division. Assuming the same crimes-per-capita rate currently observed in the Hollywood Division (0.0265 crime per capita), the residential population of the Project and related projects could generate an additional 373 crimes per year.<sup>35</sup> This degree of cumulative population growth and the associated increased crime statistics could increase the demand for LAPD services in the Hollywood Division. However, of the 373 potential crimes per year, the Project's potential incremental contribution is only 17 crimes per year, which is approximately 4.6 percent.<sup>36</sup> In addition, the Project would implement Project Design Features POL-PDF-2 through

<sup>34</sup>  $179,089 \text{ residents} \div 387 \text{ officers} = 1 \text{ officer per } 462.7 \text{ residents}.$

<sup>35</sup>  $\text{Total crimes generated by the residential population of the Project and Related Projects} = \text{estimated crime rate of } 0.0265 \text{ crime per capita} \times \text{Project and Related Projects residential service population of } 14,089 \text{ persons} = 373 \text{ crimes}.$

<sup>36</sup>  $\text{Total crimes generated by the Project} = \text{estimated crime rate of } 0.0265 \text{ crime per capita} \times \text{Project net residential service population increase of } 632 \text{ residents} = 17 \text{ crimes}.$   $17 \div 373 = 0.046 \times 100 = 4.6\%.$

**Table IV.H.2-4**  
**Estimated Service Population from Related Projects within Hollywood Division**

<b>No.<sup>a</sup></b>	<b>Project Name/Address</b>	<b>Land Use<sup>b</sup></b>	<b>Units</b>	<b>Conversion Factor<sup>c</sup></b>	<b>Service Population</b>	<b>Annual Crimes<sup>d</sup></b>
3	6400 Sunset Mixed-Use 6400 Sunset Blvd.	Apartments	232 du	2.25	522	14
4	6630 W. Sunset Blvd. 6630 W. Sunset Blvd.	Apartments	40 du	2.25	90	3
12	Modera Argyle MU 1546 N. Argyle Ave.	Apartments	276 du	2.25	621	16
15	Palladium Residences 6201 W. Sunset Blvd.	Apartments	731 du	2.25	1,645	44
16	Onni Group Mixed-Use Development 1360 N. Vine St.	Rehabilitated Uses (Residential Bungalows 8,988 sf)	12 du	2.25	27	1
19	6250 Sunset Mixed-Use (Old Nickelodeon Site) 6250 W. Sunset Blvd.	Apartments	200 du	2.25	450	12
20	Hollywood & Wilcox 6430–6440 W. Hollywood Blvd.	Apartments	260 du	2.25	585	16
21	Hollywood Center Mixed-Use (Formerly Millennium) 1720 N. Vine St.	Apartments	872 du	2.25	1,962	52
		Affordable Senior Housing	133 du	1.21	161	4
22	Mixed-Use 1310 N. Cole Ave.	Apartments	369 du	2.25	830	22
23	6200 W. Sunset Blvd. 6200 W. Sunset Blvd.	Apartments	270 du	2.25	608	16
25	1637 N. Wilcox Mixed-Use 1637 N. Wilcox Ave.	Apartments	93 du	2.25	209	6
26	Mixed-Use 1524–1538 N. Cassil Pl.	Apartments	200 du	2.25	450	12
27	Academy Square 1341 Vine St.	Apartments	200 du	2.25	450	12
31	1400 Vine 1400 Vine St.	Residential	179 du	2.25	403	10
32	6140 Hollywood 6140 Hollywood Blvd.	Condominium	27 du	2.25	61	2
33	Hollywood Crossroads 1540–1552 Highland Ave.	Residential	950 du	2.25	2,138	57
34	Hollywood Gower Mixed-Use 6100 W. Hollywood Blvd.	Apartment	220 du	2.25	495	13
35	Mixed-Use 6220 W. Yucca St.	Apartments	136 du	2.25	306	8
39	Apartments 1601 N. Las Palmas Ave.	Apartments	202 du	2.25	455	12
40	Las Palmas Residential (Hollywood Cherokee) 1718 N. Las Palmas Ave.	Residential	224 du	2.25	504	13
42	6753 Selma Mixed-Use 6753 Selma Ave.	Apartments	51 du	2.25	115	3

**Table IV.H.2-4 (Continued)**  
**Estimated Service Population from Related Projects within Hollywood Division**

No. <sup>a</sup>	Project Name/Address	Land Use <sup>b</sup>	Units	Conversion Factor <sup>c</sup>	Service Population	Annual Crimes <sup>d</sup>
44	Apartments 1749 Las Palmas Ave.	Apartments	70 du	2.25	158	4
46	Residential 1818 N. Cherokee Ave..	Apartments	65 du	2.25	146	4
		Affordable Housing	21 du	3.14	66	2
Related Projects Residential Service Population					13,457	357
Project Residential Service Population					632	17
Total Residential Service Population for Related Projects and Project					14,089	373

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*du = dwelling units*

*Totals may not sum precisely due to rounding.*

*Related project information provided by LADOT (November 18, 2020), Department of City Planning, and recent studies in the area.*

*<sup>a</sup> Project No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.*

*<sup>b</sup> Based on LAPD guidance, the analysis focused on the increased population associated with residential uses.*

*<sup>c</sup> Residential population is based on a rate of 2.25 persons per du for multi-family residential; 1.21 persons per du for affordable housing—senior; and 3.14 persons per du for affordable housing—family, included in the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

*<sup>d</sup> The number of crimes is based on the crimes-per-capita rate observed in the Hollywood Division from December 2020 through November 2020. Based on a service population of 165,000 for the Hollywood Division and 4,377 crimes committed during this timeframe, the crime rate is approximately 0.0265 crime per capita.*

*Source: Gibson Transportation Consulting, Inc., 2020 and Eyestone Environmental, 2021.*

POL-PDF-6 to reduce the demand for police protection services on the Project Site. Therefore, the Project's incremental impact is not cumulatively considerable.

Furthermore, the Project vicinity and general Hollywood Community Plan area are located within an urbanized area and it is assumed that each of the related projects identified, as well as other future development within the Hollywood Community Plan area would likewise be serviced by one or more existing police stations. In addition, similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the General Plan Framework, as listed in the Regulatory Framework (Table IV.H.2-1) above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become

necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative demand for police protection services. Furthermore, the Project, as well as the related projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could potentially be applied toward the provision of new facilities and related staffing, as deemed appropriate.

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

With regard to emergency response, the Project and related projects would introduce new uses that would generate additional traffic in the vicinity of the Project Site. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the Hollywood Division, and the Project would not contribute to a cumulative impact regarding emergency response. Furthermore, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with CVC Section 21806.

With regard to cumulative impacts on police protection, consistent with the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area and has concluded that the Project "individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities."<sup>37</sup> If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or be reviewed in a Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis,

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<sup>37</sup> Written correspondence from Michel Moore, Chief of Police, and Aaron Ponce, Captain, Commanding Officer, Community Outreach and Development Division, Los Angeles Police Department, January 14, 2021. See Appendix H of this Draft EIR.

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 police protection services and facilities would not be cumulatively considerable and, therefore, the Project's cumulative impacts would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Cumulative impacts related to police protection services and facilities 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.