

IV. Environmental Impact Analysis

G.2 Public Services—Police Protection

1. Introduction

This section analyzes whether new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated 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 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
 - Framework Element
 - Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- LAPD Computer Statistics Unit (COMPSTAT) Program

- LAPD Guidelines and Plan Review

(1) State

(a) *California Vehicle Code Section 21806*

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

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

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

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

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.

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

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) 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

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 November 17, 2021.

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.G.2-1 on page IV.G.2-5, Relevant Framework Element Infrastructure and Public Services Goals, Objectives, and Policies, below. Chapter 9 of the Framework Element addresses Infrastructure and Public Services and includes the following relevant goals, objectives, and policies outlined below in Table IV.G.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 Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Hollywood Community Plan area.³ 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

³ *The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in February 2021 and is available at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>.*

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

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

(d) Los Angeles Police Department Computer Statistics Unit Program

The LAPD Computer Statistics (COMPSTAT) Unit 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.⁴

(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;

⁴ LAPD, COMPSTAT, www.lapdonline.org/crime_mapping_and_compstat/content_basic_view/6363, accessed February 22, 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 473 square miles and is divided into four geographic bureaus: the Central Bureau; the West Bureau; the South Bureau; and the Valley Bureau.⁵ These four geographic bureaus are further divided into 21 geographic areas, which are serviced by the LAPD’s 21 community police stations.⁶ Each geographic bureau is comprised of four to five geographic area police stations.⁷

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 one officer for every 401.9 residents.⁸

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles with a population of approximately 840,000 residents.⁹ The West Bureau is bounded to the north by Forest Lawn Drive, Normandie Boulevard to

⁵ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 25, 2021.

⁶ LAPD, *LAPD Organization Chart*, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed January 11, 2021.

⁷ LAPD, *COMPSTAT Plus*, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed January 25, 2021.

⁸ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

⁹ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed February 5, 2021.

the east, El Segundo Boulevard to the south, and to the Pacific Ocean to the west. The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles Divisions, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.¹⁰ Within the West Bureau, the Project Site is located within the Hollywood Division.

(2) LAPD Community Police Station

Within the Hollywood Division, the Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, immediately south of the Project Site.¹¹ The location of the police station that serves the Project Site is depicted in Figure IV.G.2-1 on page IV.G.2-9. The Hollywood Community Police Station has a service area of approximately 13.34 square miles and serves the neighborhoods of Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue, and Los Feliz Estates.^{12,13} 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.¹⁴ As such, the officer-to-resident ratio in the Hollywood Division is 2.35 officers per every 1000 residents and is lower than the Citywide ratio of 2.5 officers per 1,000 residents.

As of January 2021, based on a four-week period between December 4, 2020, to December 31, 2020, the average response time for service in the Hollywood Division was 3.8 minutes for emergency calls and 29.4 minutes for non-emergency calls.¹⁵ The average response time Citywide during the same four-week period were 4.4 minutes for emergency calls and 28.8 minutes for non-emergency calls.¹⁶

¹⁰ LAPD, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed February 5, 2021.

¹¹ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

¹² LAPD, *About Hollywood*, www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed January 13, 2020.

¹³ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

¹⁴ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

¹⁵ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

¹⁶ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

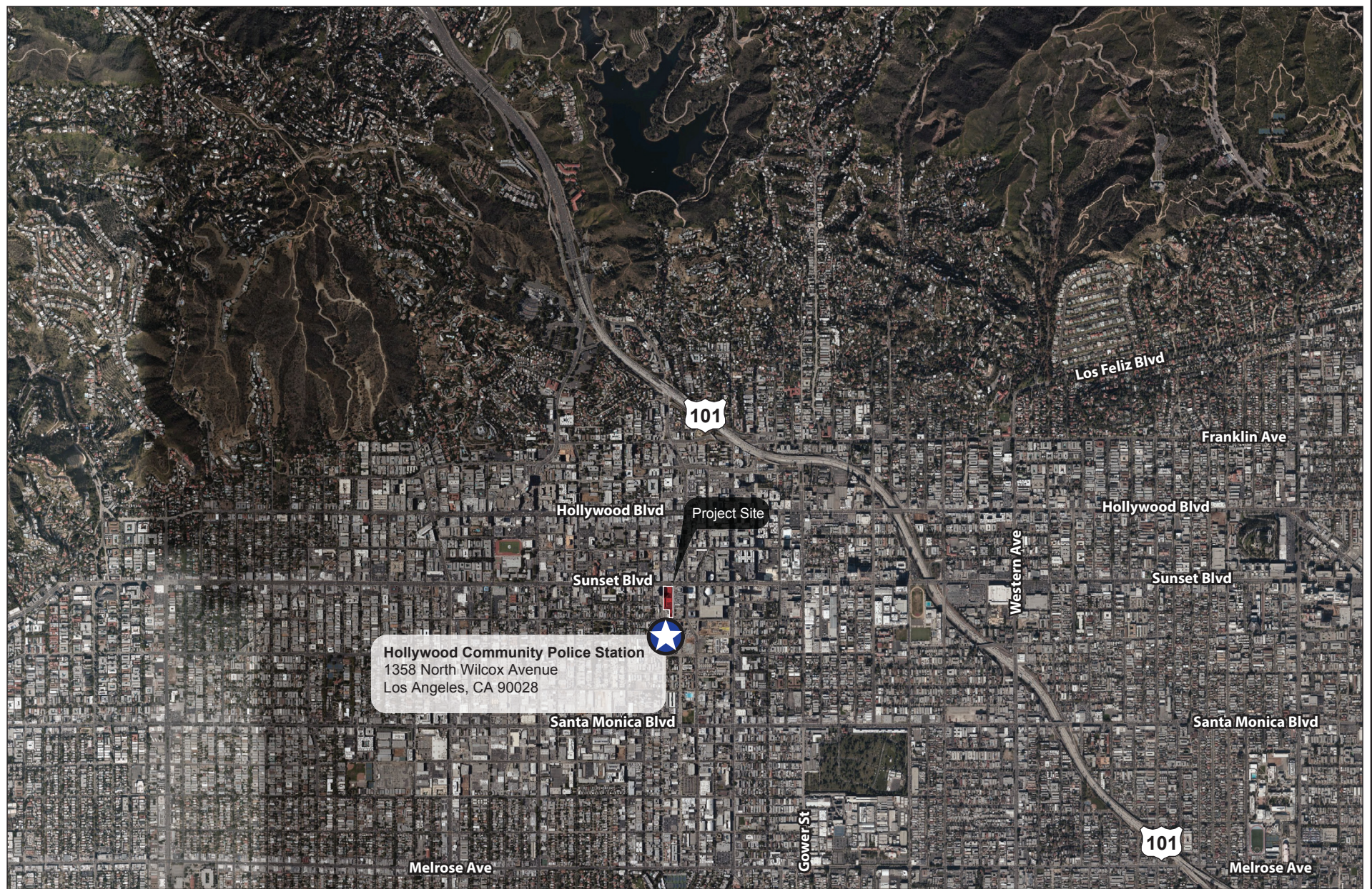


Figure IV.G.2-1
Police Station Serving the Project Site

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 if it would:

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., police), need for new or physically altered governmental facilities, the construction of which 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 in this section, the City will use Appendix G as the thresholds of significance. The factors identified below from the City's *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the CEQA Guidelines Appendix G thresholds. The *L.A. CEQA Thresholds Guide* considers the following factors to evaluate police protection:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

b. Methodology

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services and, in turn, new or physically altered government facilities. As such, the determination of significance relative to impacts on police protection services is based on the evaluation of existing police protection 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 impact on the capability of existing police protection services and personnel is based in part on the potential for the annual crimes per resident in the Hollywood service area to exceed current averages due to the addition of the Project.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact but, rather, a social and/or economic impact. 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:

Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures, including security fencing, lighting, and locked entry.

Project Design Feature POL-PDF-2: The Project will include a closed circuit camera system and keycard entry for building and parking areas not manned.

Project Design Feature POL-PDF-3: The Project will provide proper lighting of building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.

Project Design Feature POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The Project will design entrances to and exits from the building and open spaces around the building to be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: The Applicant will consult with LAPD regarding the incorporation of feasible crime prevention features. 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 Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Division. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of the existing commercial buildings on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be reduced, resulting in less demand for police protection services and associated government facilities.

Project construction activities could also potentially impact LAPD police protection services and response 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, including 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.H, Transportation, of this Draft EIR, a construction traffic management plan, including a worksite traffic control plan, would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 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 vicinity of the Project Site 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 activities 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 includes the development of a 15-story commercial building with a total floor area of 443,418 square feet consisting of 431,032 square feet of office space and 12,386 square feet of ground floor restaurant space as defined by the LAMC. However, to provide a conservative analysis of the Project's environmental impacts, this EIR assumes the approximately 1,800 square feet of outdoor covered patio areas adjacent to the ground floor restaurant space along Sunset Boulevard would count as floor area, resulting in a total floor area of 445,218 square feet, including 431,032 square feet of office space and 14,186 square feet of restaurant space. As the Project would remove the existing approximately 26,261 square feet of office and retail uses, the Project, under this conservative analysis, would result in a net increase in floor area of 418,957 square feet. The Project also includes a LADWP equipment area that would include electrical distribution equipment and

emergency generators within the De Longpre Lot. As such, the Project would not introduce a new residential population to the Project Site that could generate a direct demand for police protection services. Therefore, as no residential uses are proposed, the Project would not increase the LAPD residential service population in the Hollywood Division of 165,000 persons. The Project would introduce a new employee and visitor population to the Project Site.¹⁷ Specifically, based on employee generation rates promulgated by the City's VMT Calculator Documentation, the Project's net increase in floor area of 418,957 square feet would generate approximately 1,710 net new employees.¹⁸

As discussed above, the Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, located immediately south of the Project Site. The Hollywood Community Police Station is staffed by 387 sworn officers and a 15-person civilian support staff.

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 building and parking areas not manned. 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 around the building to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site to the LAPD showing access routes and other information that might facilitate police response. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features, as well as the Project's

¹⁷ When calculating service ratios, LAPD considers only the residential service population of the service area.

¹⁸ Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (431,032 square feet) and existing (9,329 square feet) office uses, the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (14,186 square feet), and the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the existing 16,932 square feet of retail uses to be removed.

contribution to the General Fund, would help offset the Project-related increase in demand for police protection services. In addition, as previously discussed, the Project's increase in employees would result in an approximately one percent increase in crimes in the Hollywood Community, which would not require new or expanded police services and facilities. **Therefore, the Project's impact on police protection services would be less than significant.**

The Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. Project-related traffic would have the potential to affect emergency vehicle response 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 delay in emergency response to the Project area due to traffic congestion. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. **Therefore, the Project would not cause a substantial adverse impact on emergency response and impacts would be less than significant.**

Additionally, the Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. Based on the above analysis, the Project 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."¹⁹ **Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts.**

Based on the analysis and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2) of the local jurisdiction to provide police protection services, it is reasonable to conclude that Project operation would not require the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain police protection service as such services will be provided by a local

¹⁹ Written correspondence from Officer Alfonso Velasco, CPD, Community Outreach and Development Division, Los Angeles Police Department January 14, 2021. See Appendix H of this Draft EIR.

jurisdiction and would not inhibit LAPD emergency response. Accordingly, operation of the Project would not result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities (i.e., police), the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Therefore, impacts to police protection services during Project operation would be less than significant, and no mitigation measures are required. **Based on the above analysis, 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. Therefore, impacts with regard to police protection services would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2026 includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, a total of 55 related projects are located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 55 is a conservative assumption, as some of the related projects may not be built out by 2026 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 55 are fully built out by 2026.

Additionally, the Hollywood Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline

forecast, as the Project is to be completed in 2026, well before the Hollywood Community Plan Update's horizon year. It can also be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update upon its adoption.

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Should Project construction occur concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's construction management plan, as developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each related project would implement similar design features during construction and 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 during construction. 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 Community Plan area would likewise be serviced by one or more existing police stations. Finally, the Project in and of itself would not cause a significant impact to police services during construction. **Therefore, the Project's contribution to cumulative impacts on police protection services during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.**

(b) Operation

As shown in Table IV.G.2-2 on page IV.G.2-18, growth from the related projects is estimated to result in a total police service population of approximately 30,260 persons, including both residents (permanent population) and employees (daytime population). When considering only residential population, the related projects are estimated to generate 16,632 new residents. The Project does not include residential uses and would not add to this additional estimated residential population from the related projects. With the additional residential population associated with the related projects, the Hollywood Division police service population would increase from 165,000 residents to 181,632 residents, which would decrease the officer-to-resident ratio from the current ratio

Table IV.G.2-2
Estimated Service Population from Related Projects within Hollywood Area

No.^a	Project	Land Use	Size	Conversion Factor^b	Service Population
1	6225 W. Hollywood Blvd.	Office	214,000 sf	0.004	856
2	6360 W. Hollywood Blvd.	Hotel	90 rm	0.5	45
		Restaurant	11,000 sf	0.004	44
3	6523 W. Hollywood Blvd.	Office	4,074 sf	0.004	16
		Other	10,402 sf	0.004	42
4	1313 N. Vine St.	Other	44,000 sf	0.004	176
		Other	35,231 sf	0.004	141
5	1610 N. Highland Ave.	Apartments	248 du	2.25	558
		Retail	12,785 sf	0.004	51
6	6201 W. Sunset Blvd.	Apartments	731 du	2.25	1,645
		Other	5,000 sf	0.004	20
		Retail	8,000 sf	0.004	32
		Other	1,000 sf	0.004	4
		Retail	13,000 sf	0.004	52
		Other	1,000 sf	0.004	4
7	6230 W. Sunset Blvd.	Apartments	200 du	2.25	450
		Office	13,510 sf	0.004	54
		Other	13,471 sf	0.004	54
		Other	N/A		
		Retail	4,700 sf	0.004	19
8	1525 N. Cahuenga Blvd.	Hotel	64 rm	0.5	32
		Office	1,500 sf	0.004	6
		Rooftop Restaurant/ Lounge	700 sf	0.004	3
9	1718 N. Las Palmas Ave.	Apartments	195 du	2.25	439
		Condominiums	29 du	2.25	66
		Retail	985 sf	0.004	4
10	1310 N. Cole Ave.	Apartments	375 du	2.25	844
		Office	2,500 sf	0.004	10
11	6611 W. Hollywood Blvd.	Other	167 rm	0.5	84
		Other	10,545 sf	0.004	42
		Other	5,375 sf	0.004	22
		Other	3,980 sf	0.004	16
		Other	1,634 sf	0.004	7
12	6445 W. Sunset Blvd.	Hotel	175 m	0.5	88
		Restaurant	11,400 sf	0.004	46
13	6409 W. Sunset Blvd.	Hotel	275 rm	0.5	138
		Retail	1,900 sf	0.004	8

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

No.^a	Project	Land Use	Size	Conversion Factor^b	Service Population
14	1717 N. Wilcox Ave.	Hotel	140 rm	0.5	70
		Retail	3,500 sf	0.004	14
15	6831 W. Hawthorn Ave.	Apartments	140 du	2.25	315
		Other	1,207 sf	0.004	5
16	1749 N. Las Palmas Ave.	Apartments	71 du	2.25	160
17	6701 W. Sunset Blvd.	Mixed-Use	N/A		
18	6200 W. Sunset Blvd.	Apartments	270 du	2.25	608
		Other	2,500 sf	0.004	10
		Other	N/A		
		Other	2,500 sf	0.004	10
19	6332 W. De Longpre Ave.	Apartments	200 du	2.25	450
		Office	298,171 sf	0.004	1,193
		Other	4,200 sf	0.004	17
		Other	11,935 sf	0.004	48
20	6516 W. Selma Ave.	Hotel	212 du	2.25	477
		Other	2,308 sf	0.004	9
		Other	5,305 sf	0.004	21
		Other	5,843 sf	0.004	23
21	1600 N. Schrader Blvd.	Hotel	198 rm	0.5	99
		Other	2,379 sf	0.004	10
		Other	3,600 sf	0.004	14
22	6421 W. Selma Ave.	Other	114 du	2.25	257
		Other	5,041 sf	0.004	20
		Other	1,809 sf	0.004	7
23	1601 N. Las Palmas Ave.	Apartments	202 du	2.25	455
		Commercial	14,200 sf	0.004	57
24	1360 N. Vine St.	Office	463,521 sf	0.004	1,854
		Restaurant	20,902 sf	0.004	84
25	1541 N. Wilcox Ave.	Hotel	190 rm	0.5	95
		Other	8,500 sf	0.004	34
		Other	1,382 sf	0.004	6
26	1400 N. Cahuenga Blvd.	Hotel	220 rm	0.5	110
		Restaurant	2,723 sf	0.004	11
		Bar	1,440 sf	0.004	6
27	6436 W. Hollywood Blvd.	Apartments	260 du	2.25	585
		Retail	14,220 sf	0.004	57
		Office	3,580 sf	0.004	14
28	6400 W. Sunset Blvd.	Apartments	200 du	2.25	450
		Other	4,037 sf	0.004	16
		Other	3,000 sf	0.004	12

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

No.^a	Project	Land Use	Size	Conversion Factor^b	Service Population
29	1546 N. Argyle Ave.	Apartments	276 du	2.25	621
		Retail	9,000 sf	0.004	36
		Other	15,000 sf	0.004	60
		Other	27,000 sf	0.004	108
30	1533 N. Schrader Blvd.	Shelter	70 du	1.12	79
31	1545 N. Wilcox Ave.	Retail	14,800 sf	0.004	59
		Office	16,100 sf	0.004	64
32	1637 N. Wilcox AV	Apartments	154 du	2.25	347
		Commercial	6,586 sf	0.004	26
33	6753 W. Selma Ave.	Apartments	51 du	2.25	115
		Retail	438 sf	0.004	2
34	1524 N. Cassil Place	Apartments	138 du	2.25	311
		Other	62 rm	0.5	31
		Other	1,400 sf	0.004	6
35	1720 N. Vine St. (Hollywood Center Project)	Apartments	872 du	2.25	1,962
		Affordable Senior Housing	133 du	1.21	161
		Other	4,530 sf	0.004	18
		Other	25,650 sf	0.004	103
		Other	350 per	1	350
36	1723 N. Wilcox Ave.	Hotel	81 rm	0.5	41
		Other	N/A		
37	1400 N. Vine St.	Apartments	179 du	2.25	403
		Apartments	19 du	2.25	43
		Retail	16,000 sf	0.004	64
38	1818 N. Cherokee Ave.	Apartments	65 du	2.25	147
		Apartments	21 du	2.25	48
39	1235 Vine St.	Office	117,000 sf	0.004	468
		Retail	7,800 sf	0.004	31
40	1708–1732 N. Cahuenga Blvd.	Office	210,500 sf	0.004	842
		Restaurant	6,500 sf	0.004	26
41	1612 N. McCadden Place	Retail	37,000 sf	0.004	148
		Micro-Units	69 du	2.25	156
42	6517–6533 Lexington Ave.	Single-Family Homes	18 du	3.15	57
43	1400 N. Highland Ave.	Apartments	49 du	2.25	111
		Retail	800 sf	0.004	3
44	6100 W. Hollywood Blvd.	Apartments	209 du	2.25	471
		Apartments	11 du	2.25	25
		Other	3,270 sf	0.004	13

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

No. ^a	Project	Land Use	Size	Conversion Factor ^b	Service Population
45	6630 W. Sunset Blvd.	Apartments	40 du	2.25	90
		Retail	3,474 sf	0.004	14
46	6350 Selma Ave.	Apartments	290 du	2.25	653
		Commercial	6,576 sf	0.004	26
47	6140 Hollywood Blvd.	Hotel	102 rm	0.5	51
		Condominiums	27 du	2.25	61
		Restaurant	11,500 sf	0.004	46
48	1718 Vine St.	Hotel	216 rm	0.5	108
49	1719 N. Whitley Ave.	Hotel	156 rm	0.5	78
50	6677 Santa Monica Blvd.	Apartments	695 du	2.25	1,564
		Other	4,000 sf	0.004	16
		Other	5,500 sf	0.004	22
		Retail	15,400 sf	0.004	62
51	1118 N. McCadden	Office	17,040 sf	0.004	68
		Other	29,650 sf	0.004	119
		Other	100 du	2.25	225
		Other	92 du	2.25	207
52	6050 W. Sunset Blvd.	Office	859,350 sf	0.004	3,437
		Other	52,800 sf	0.004	211
		Other	169,400 sf	0.004	678
53	6220 W. Yucca St.	Apartments	210 du	2.25	473
		Other	136 rm	0.5	68
		Retail	12,570 sf	0.004	50
54	1149 N. Gower St.	Apartments	169 du	2.25	381
55	1233 N. Highland Ave.	Apartments	72 du	2.25	162
		Commercial	12,160 sf	0.004	49
Related Projects Service Population					30,260
Project Service Population					1,710
Total Service Population for Related Projects and Net Project					31,970
Related Projects Residential Service Population					16,632
Net Project Residential Service Population					
Total Residential Service Population for Related Projects and Net Project					16,632
<hr/>					
du = dwelling units					
emp = employees					
per = persons					

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

No.^a	Project	Land Use	Size	Conversion Factor^b	Service Population
<i>rm = rooms</i> <i>sf = square feet</i> ^a <i>The project number corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.</i> ^b <i>Residential population and number of employees is based on the population and employee generation rates in City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.</i> <i>Source: Eyestone Environmental, 2021.</i>					

of 2.4 officers per 1,000 residents²⁰ to 2.13 officers per 1,000 residents²¹ whether or not the Project is implemented.

Similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes review by the LAPD to ensure sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as discussed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, based on the City's review of the related projects, it is anticipated that the related projects would implement 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 revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate by the City.

As the Project vicinity and general Hollywood Community Plan area are located within an urbanized area, 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. As discussed above, the Project is not anticipated to substantially affect existing emergency response in the Hollywood Division,

²⁰ $(387 \text{ officers} / 165,000 \text{ residents}) \times 1,000 = 2.4 \text{ officers per } 1,000 \text{ residents}$

²¹ $(387 \text{ officers} / 181,632 \text{ residents}) \times 1,000 = 2.13 \text{ officers per } 1,000 \text{ residents.}$

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.²² 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."²³ 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, including identification of a specific location for such potential facilities, 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's contribution to cumulative operational impacts to police protection services would not be cumulatively considerable. The Project would not result in cumulative adverse 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 service. As such, cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

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

²² (2015) 242 Cal.App.4th 833.

²³ Written correspondence from Officer Alfonso Velasco, CPD, 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

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