

IV. Environmental Impact Analysis

J.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 March 3, 2022, and includes statistical data regarding police protection facilities, services, and response times. This information is included in Appendix L of this Draft Environmental Impact Report. Additional information included in this analysis is also based on LAPD's 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
- City of Los Angeles General Plan
 - Framework Element
 - Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes
- LAPD COMPSTAT Program and 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 California Vehicle Code 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 found that Section 35 of Article XIII of the California Constitution requires local agencies to

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.

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.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 would be available should an emergency arise that requires immediate response by more law enforcement personnel than would be available to LAPD using only its own available resources.

(3) Local

(a) City of Los Angeles General Plan

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the City and guides subsequent

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 March 9, 2022.

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.J.2-1 on page IV.J.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.J.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) 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.H, Land Use and Planning, of this Draft EIR, the Project Site is located within the Wilshire Community Plan (Community Plan) area. The Community Plan, adopted on September 19, 2001, includes the following objectives and policies that are relevant to police protection:

- Objective 8-1: Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.
- Policy 8-1.1: Consult with the LAPD in the review of development projects and land use changes to determine law enforcement needs and Improve the ability of

Table IV.J.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>	

the community and police department to minimize crime and provide adequate security for all residents.

- Objective 8-2: Improve the ability of the community and police department to minimize crime and provide adequate security for all residents.
- Policy 8-2.2: Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.
- Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.

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

(e) LAPD Guidelines and Plan Review

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD.

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: the Central Bureau, West Bureau, South Bureau, and Valley Bureau.⁴ These four geographic bureaus are further divided into 21 geographic areas,

³ LAPD, COMPSTAT, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/crime-mapping-and-compstat/, accessed March 9, 2022.

⁴ LAPD, LAPD Organization Chart, www.lapdonline.org/lapd-organization-chart/, accessed March 9, 2022.

which are serviced by LAPD's 21 community police stations.⁵ Each bureau is comprised of four to five geographic areas/police stations.⁶

According to LAPD's correspondence, the departmental staffing resources include 9,506 sworn officers. Based on a total City population of 3,966,936, LAPD cites an officer-to-resident ratio of approximately one officer for every 396.9 residents.⁷

The Project Site is located in the West Bureau, which covers a territory of approximately 124 square miles, with a population of approximately 840,400 residents. The West Bureau oversees operations in the Hollywood, Wilshire, Pacific and West Los Angeles service areas. The West Bureau also oversees the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.⁸

(2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within the Wilshire Division, which is served by the Wilshire Community Police Station. As shown in Figure IV.J.2-1 on page IV.J.2-8, the Wilshire Community Police Station is located at 4861 West Venice Boulevard, approximately 3.7 miles southeast of the Project Site, with a response time of approximately 14 minutes to the Project Site.⁹ The Wilshire Community Police Station services an area of approximately 13.97 square miles, sometimes referred to herein as the Wilshire Area, which is bounded by La Cienega Boulevard, San Vicente Boulevard, and Doheny Drive to the west; Romain Street, Willoughby Avenue, and Melrose Avenue to the north; Gower Street, Plymouth Boulevard, Bronson Avenue, and Arlington Avenue to the east; and the Santa Monica Freeway (I-10) to the south. The Wilshire Division is also bordered by the service areas of the Beverly Hills Police Department to the west, the Los Angeles County Sheriff's Department West Hollywood Station to the north, and LAPD's Olympic Division to the east. The Wilshire Division is further comprised of 57 Reporting Districts; the Project Site is located in Reporting District 0724, which is bounded by

⁵ LAPD, Community Police Station Address Directory, www.lapdonline.org/find-your-local-police-station/, accessed March 9, 2022.

⁶ LAPD, LAPD Organization Chart, www.lapdonline.org/lapd-organization-chart/, accessed March 9, 2022.

⁷ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

⁸ LAPD, About West Bureau, www.lapdonline.org/lapd-contact/west-bureau/, accessed March 9, 2022.

⁹ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

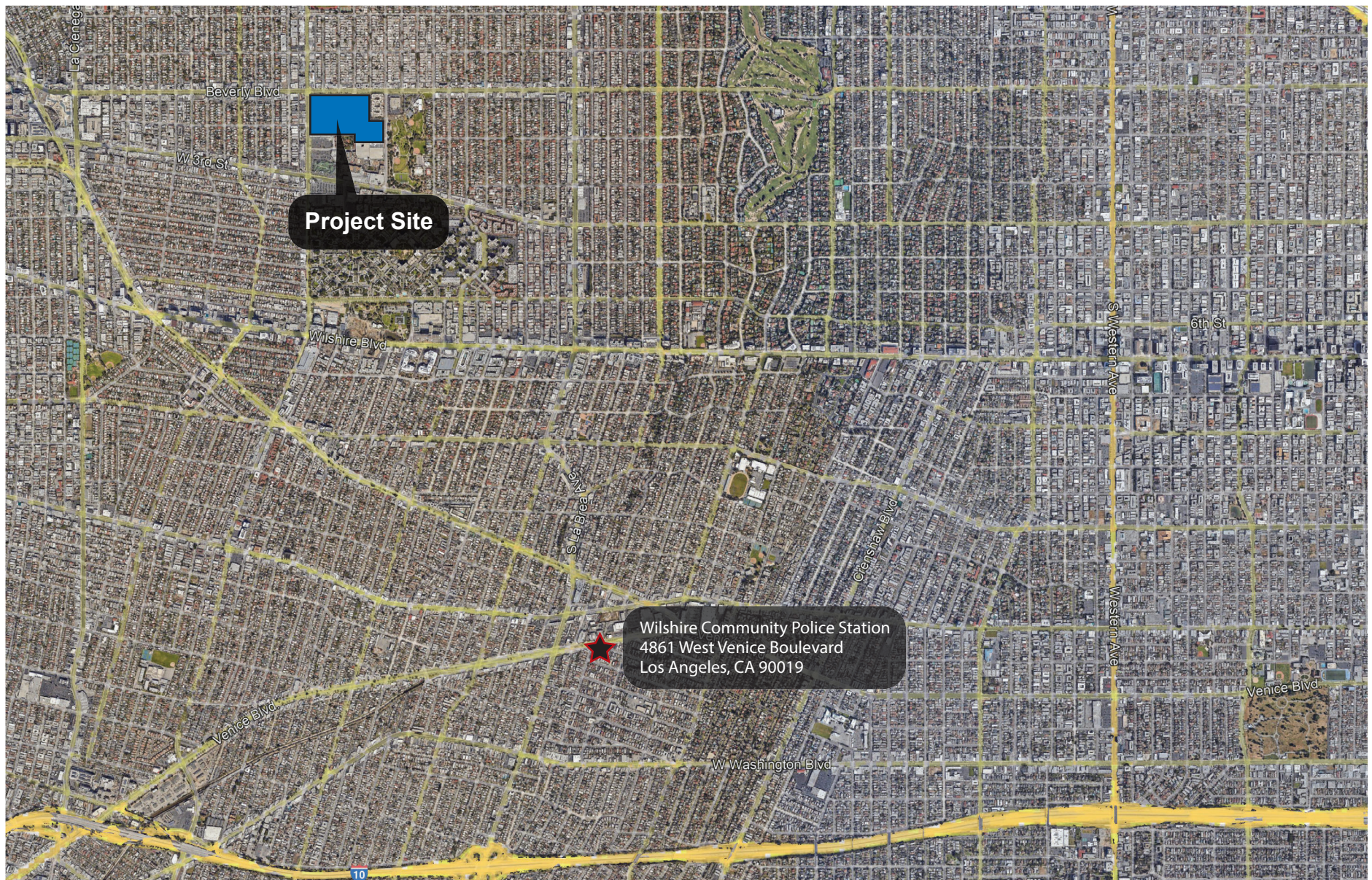


Figure IV.J.2-1
Police Station in the Vicinity of the Project Site

Fairfax Avenue to the west, Beverly Boulevard to the north, Gardner Street to the east, and 3rd Street to the south.¹⁰

The Wilshire Community Police Station serves a population of approximately 250,000 residents and is staffed by approximately 256 sworn officers and 10 civilian support staff. The average response times for the station's emergency—high priority, medium-high priority, and non-emergency calls from January 23, 2022, to February 19, 2022, were 4.7, 17.1, and 37.7 minutes, respectively. Citywide, the average response times for emergency—high priority, medium-high priority, and non-emergency calls during the same timeframe were 4.8, 16.0, and 34.1 minutes, respectively. As indicated by LAPD, the response times for the Wilshire Division are considered adequate.¹¹

Based on the service population of 250,000 residents, the officer-to-resident ratio of the Wilshire Community Police Station is approximately one officer per 976 residents.¹² As such, the officer-to-resident ratio in the Wilshire Division is lower than the citywide ratio of one officer per 396.9 residents.¹³ Additionally, throughout the day, the business and residential population of the Wilshire service area increases to approximately 500,000 people.¹⁴

(3) LAPD Crime Statistics

Table IV.J.2-2 on page IV.J.2-10 provides a comparison of the Wilshire Area and citywide data regarding crimes reported by LAPD based on residential populations. As shown therein, based on the most recent data provided by the LAPD Community Relationship Division and COMPSTAT for the 2022 year to date (YTD), approximately 1,002 crimes were reported within the Wilshire Area, and 21,245 crimes were reported citywide. Based on the respective residential service populations, approximately

¹⁰ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

¹¹ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

¹² Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

¹³ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

¹⁴ LAPD, About Wilshire, www.lapdonline.org/lapd-contact/west-bureau/wilshire-community-police-station/, accessed March 9, 2022.

**Table IV.J.2-2
2021 YTD Crimes—Wilshire Area and Citywide**

	Reported Crimes	Service Population	Crimes per 1,000 Persons	Crimes per Capita
Wilshire Area	1,002	250,000	4.01	0.004
Citywide	21,245	3,966,936	5.36	0.005
<p>Source: LAPD, COMPSTAT Unit, COMPSTAT Wilshire Area Profile 7/04/21–7/31/21, COMPSTAT Citywide Profile 7/04/21–7/31/21, and written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, March 3, 2022, included in Appendix L of this Draft EIR.</p>				

4.01 crimes per 1,000 residents (0.004 crime per capita) were reported in the Wilshire Area, and 5.36 crimes per 1,000 residents (0.005 crime per capita) were reported citywide.

Based on the number of sworn officers in the Wilshire Community Police Station (256 sworn officers), the current 2022 ratio of crimes per officer is 3.9 crimes per officer in comparison to a 2022 citywide ratio of 2.2 crimes per officer (9,506 sworn officers citywide). Thus, the Wilshire Area has a higher crime per officer ratio compared to the citywide ratio.

3. Project Impacts

a. Thresholds of Significance

In accordance with the Appendix G of the CEQA Guidelines, 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 governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

For this analysis, the Appendix G Threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold question.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to police protection services:

- 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 type of calls for service. Changes in these factors resulting from a project may affect the demand for services and, in turn, the need for new or physically altered government facilities. As such, the determination of significance relative to impacts on police services is based on an evaluation of existing police services provided by the police station 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 LAPD, focuses on any increase in the residential population related to the Project. The determination of impacts on the capability of existing police services and personnel is based in part on the potential for the annual crimes per resident in the Wilshire Area to exceed current averages due to the addition of the Project. Project design features that would reduce the Project's impact on police services are also considered.

The need for or deficiency in adequate police protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional police protection 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 an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to police services is determined by whether construction of new or expanded police facilities is 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 historical development of police facilities, such that in the event the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that

are between 0.5 acre and 1.0 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or 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 Project construction, the Applicant will implement security measures including security fencing, low-level security lighting, locked entry, and security patrols.

Project Design Feature POL-PDF-2: During operation, the Project will incorporate a 24/7 security plan to ensure the safety of its employees and visitors. The Project's security plan will include, but will not be limited to, the following design features:

- Security fencing, walls, landscaping, and/or other elements to create a physical barrier at the Project Site perimeter;
- Points of entry will be secured by elements such as guard booths, key card passes, and pedestrian and vehicular access controls;
- A 24-hour security camera network to provide visual surveillance of outdoor areas, parking facilities, and other activity areas;
- Private on-site security staff, including at guard booths to control entry, and regular security patrols of the Project Site; and
- Appropriate staff training on security protocols, including site and building access control, managing and monitoring fire/life/safety systems, and patrolling the Project Site.

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

Project Design Feature POL-PDF-4: The Project will include appropriate lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: The design of the Project's entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways will be open and in view of surrounding sites.

Project Design Feature POL-PDF-6: Prior to the issuance of a building permit, the Applicant will consult with Los Angeles Police Department's (LAPD's) Crime Prevention Unit regarding the incorporation of feasible crime prevention features appropriate for the design of the Project.

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

Additionally, the Applicant currently provides advance notice to and coordinates with LAPD regarding large special events that take place on the Project Site. As under existing conditions, on-site security and safety measures would continue to be implemented as part of future operations within the Project Site to reduce the demand for LAPD services, pursuant to Project Design Feature POL-PDF-2. Further, as discussed in Section IV.K, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant would implement a Construction Traffic Management Plan that includes provisions for maintaining emergency access to and surrounding the Project Site during Project construction. Additionally, the Construction Traffic Management Plan provides for a construction manager to serve as a liaison with the surrounding community.

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 governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

(1) Impact Analysis

(a) Construction

Construction of the Project would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station. In addition, the Project Site would continue to be enclosed with fencing, walls, or other barriers to prevent unauthorized access, as under existing conditions. Furthermore, access to the Project Site would continue to be controlled by staffed guard houses. Therefore, Project construction would not contribute to an increased demand for police protection services. Per Project Design Feature POL-PDF-1, additional security measures such as appropriate lighting, locked entry, and security patrols would be implemented during construction. With continued implementation of these security measures, the potential demand for police protection services at the Project Site during construction would be reduced.

Construction activities also have the potential to affect LAPD response due to lane closures, congestion, or otherwise reduced capacities of the adjacent streets. As discussed in Section IV.K, Transportation, of this Draft EIR, while most construction activities are expected to be contained within the boundaries of the Project Site, it is expected that the installation of new driveways, traffic signals, left-turn lanes, and sidewalks, as well as improvements to curbs, gutters, etc. would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on Fairfax Avenue, Beverly Boulevard, and The Grove Drive. As such, segments of the existing sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained. In addition, as discussed in Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management 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.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term with varied intensities, Project construction activities could temporarily impact emergency response and access. However, with implementation of Project Design Feature TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., signs, flag persons, etc.) would also be utilized, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by 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, Project construction activities would not generate a demand for additional police protection services that would necessitate the provision of new or physically altered governmental facilities. 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 previously discussed, LAPD considers the residential population within a given service area to evaluate service capacity. As described in Section II, Project Description, of this Draft EIR, the Project would involve the modernization and expansion of Television City through a proposed Specific Plan. At full buildout, the Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of floor area within the Project Site. Specifically, the Specific Plan would allow for the construction of up to 1,626,180 square feet of new sound stage, production support, production office, general office, and retail uses; the demolition of up to 495,860 square feet of existing uses; and the retention of up to 247,820 square feet of existing uses. 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 Wilshire Division.

The Project would introduce a new employee and visitor population to the Project Site. As discussed in the Initial Study provided in Appendix A of this Draft EIR, the Project would result in an estimated net increase of 5,702 employees on-site. As previously noted, the business and residential population of the Wilshire Area currently increases up to approximately 500,000 people on a daily basis. The Project would contribute to this daytime population and, therefore, may result in an increased demand for police services.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-7, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site, which would reduce the demand for police services. In particular, as set forth in Project Design Feature POL-PDF-2, the Project would include a 24/7 security plan to ensure the safety of its employees and site visitors. This security plan will include a secured Project Site perimeter and secured entry points, a 24-hour security camera network, controlled access to all buildings, private on-site security staff, and regular security patrols of the Project Site. In addition, the Project would include appropriate lighting of buildings and walkways to orient pedestrians and clearly identify secure routes between parking areas and building points of entry, as set forth in Project Design Feature POL-PDF-3, as well as sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment per Project Design Feature POL-PDF-4. Furthermore, Project Design Feature POL-PDF-5 would require the design of Project entrances to and exits from buildings, spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Lastly, as specified in Project Design Features POL-PDF-6 and POL-PDF-7, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the Project Site to LAPD showing access routes and other information to facilitate police response. In addition to these security 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.¹⁵ The proposed Project 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. Overall, as indicated by LAPD (see Appendix L of this Draft EIR), the Project would not require any special police protection requirements and would not result in the need for new or altered police facilities.¹⁶ **Therefore, the Project's impact on police services would be less than significant.**

Project-related traffic could have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by congestion. As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency access to the Project Site, would be provided via nine vehicular access points as follows:¹⁷

1. Three driveways along Beverly Boulevard, including one entry/exit driveway and two right-in/right-out driveways;
2. Three driveways along Fairfax Avenue, including one entry/exit driveway and two right-in/right-out driveways;
3. One entry/exit driveway on The Grove Drive; and
4. Two right-in/left-out entry/exit driveways along the Southern Shared Access Drive.¹⁸

As discussed in detail in Section IV.K, Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Compliance with such requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118, prior to the issuance of any building permit. In addition, the Project would not include the installation of any barriers that could impede emergency vehicle access. As

¹⁵ City of Los Angeles, Proposed Budget for the Fiscal Year 2021–22.

¹⁶ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

¹⁷ Project Site vehicular access is shown in Figure IV.K-3 in Section IV.K, Transportation, of this Draft EIR.

¹⁸ The Southern Shared Access Drive is a privately-owned right-of-way that is partially located on the Project Site and partially located off-site on the adjacent properties to the south. While not a component of the Project, the Southern Shared Access Drive provides shared access to the Project Site and the adjacent properties to the south from The Grove Drive. Refer to Figure II-3 in Section II, Project Description, of this Draft EIR for an illustration.

such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operations. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. **Accordingly, Project operation would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, the Project's impact on emergency response times would be less than significant.**

Based on the analysis above and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2) to provide adequate emergency response 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 service; such services will be provided by the local jurisdiction; and the Project would not inhibit LAPD response. **Therefore, the Project would not generate a demand for additional police protection services that would exceed LAPD's capacity to serve the Project Site. The Project also would not result in a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. Therefore, Project operation would not necessitate the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services. Thus, Project impacts to police protection services would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The

Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, the Project's security needs would not change with a later buildout date, as such features are based on full occupancy and operation of the Project regardless of when they occur. While calls for service and surrounding traffic levels (and therefore response times) could potentially increase in future years due to anticipated growth in the surrounding area, as previously discussed, the City is legally obligated to provide adequate police protection services in accordance with state law. If the number of incidents in a given area increases, it is LAPD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Therefore, a later buildout date would not affect the impacts or significance conclusions presented above. In addition, no changes to the proposed Project design features would be necessary in the event of an extended buildout, except as needed to comply with future new or updated regulatory standards.

f. Cumulative Impacts

Cumulative growth in the greater Project area through 2026 (the Project's anticipated buildout year) 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, there are 68 related projects located in the vicinity of the Project Site. Of these, 15 related projects fall within the boundaries of the Wilshire Division, and are thus served by the Wilshire Community Police Station, and include residential uses.¹⁹ Although Related Project Nos. 26 through 67 are located in the Cities of West Hollywood and Beverly Hills, which are served by other police/sheriff departments, LAPD and neighboring police/sheriff departments have mutual aid agreements and support each other as needed to respond to emergencies. In addition, some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. Furthermore, much of this growth is already anticipated by the City. Nevertheless, to provide a conservative analysis, the future baseline forecast assumes that Related Project Nos. 1 through 68 would be fully built out by 2026, unless otherwise noted.

(1) Impact Analysis

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each related project would be addressed as part of each project's development review process

¹⁹ As previously discussed, when calculating service ratios, LAPD considers only the residential service population of the service area.

conducted by the City. Should Project construction occur concurrently with that of nearby related projects, coordination among these multiple construction sites would be required and implemented through each development'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 located in the City would be subject to the City's routine construction permitting process, which includes a review by LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, 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, cumulative construction impacts on police protection services would be less than significant.**

(b) Operation

As shown in Table IV.J.2-3 on page IV.J.2-20, based on a household size factor of 3.14 persons for affordable multi-family units and 2.25 persons for other multi-family housing, the residential component of related projects that fall within the service area of the Wilshire Community Police Station would generate approximately 4,592 residents. As described above, the Project does not include residential uses and would not add to this residential population. The residential population estimate associated with related projects is conservative in that it does not account for the removal of existing uses and their associated residential or employee populations. Notwithstanding, when considering these estimates, the Wilshire Area's police service population would increase from approximately 250,000 to 254,592 residents upon buildout of the related projects, which would in turn reduce the officer-to-resident ratio for the Wilshire Area from the current ratio of approximately one officer per 976 residents to approximately one officer per 994 residents.

The additional residential population associated with the related projects plus general growth in the Project area would likewise have an effect on crime in the Wilshire Area, which could increase based on per capita crime rates. Assuming the same crime per capita rate currently observed in the Wilshire Area (0.004 crime per capita), the residential population of the related projects could generate an estimated additional 29 crimes per year. This degree of cumulative population growth and the associated increased crime statistics could increase the demand for LAPD services in the Wilshire Area. However, as previously stated, the Project would not add to the residential population and thus would not affect the crime per capita rate. Furthermore, as previously discussed, while the daytime population in the Wilshire Area is anticipated to increase as a result of the Project, the Project would implement Project Design Features POL-PDF-2 through POL-PDF-7 to reduce its demand for police protection services. As stated by LAPD, "[t]he TVC 2050

Table IV.J.2-3
Estimated Service Population from Related Projects within Wilshire Area

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Conversion Factor ^c	Service Population ^c	Incidents ^d
1	Beverly & Fairfax Mixed-Use 7901 West Beverly Boulevard	Apartments	71 du	2.25/du	160	1
6	1556–1564 Hi Point Street 1556 South Hi Point Street	Apartments	45 du	2.25/du	102	1
7	Unified Elder Care Facility/Mixed-Use 8052 West Beverly Boulevard	Apartments	102 du	2.25/du	230	1
8	8000 Beverly Mixed-Use 8000 West Beverly Boulevard	Apartments	48 du	2.25/du	108	1
10	Third Street Mixed-Use 8000 West 3rd Street	Apartments	45 du	2.25/du	102	1
		Affordable Housing	5 du	3.14/du	16	1
11	7951 Beverly Mixed-Use 7951 West Beverly Boulevard	Apartments	51 du	2.25/du	115	1
		Affordable Housing	6 du	3.14/du	19	1
12	830-840 Fairfax Avenue 800 South Fairfax Avenue	Apartments	209 du	2.25/du	471	2
13	Third & Fairfax Mixed-Use 6300 West 3rd Street	Apartments	331 du	2.25/du	745	3
14	Wilshire & Crescent Heights Mixed-Use 6245 West Wilshire Boulevard	Apartments	158 du	2.25/du	356	2
		Condominiums	4 du	2.25/du	9	1
15	Apartments 350 North Hayworth Avenue	Apartments	18 du	2.25/du	41	1
		Affordable Housing	2 du	3.14/du	7	1
18	333 La Cienega Boulevard Project 333 South La Cienega Boulevard	Apartments	145 du	2.25/du	327	2
19	627 South La Brea Avenue 627–667 South La Brea Avenue	Apartments	160 du	2.25/du	360	2
20	Wilshire & La Jolla Tower 6401–6419 Wilshire Boulevard	Apartments	90 du	2.25/du	203	1
22	La Brea Gateway 915 North La Brea Avenue	Apartments	179 du	2.25/du	403	2
23	Mixed-Use 5411 West Wilshire Boulevard	Apartments	310 du	2.25/du	698	3
		Affordable Housing	38 du	3.14/du	120	1
Related Projects Residential Service Population					4,592	29
Project Residential Service Population					0	0
Total Residential Service Population for Related Projects and Project					4,592	29

du = dwelling units

Numbers may not sum precisely due to rounding.

^a Map No. corresponds to Table III-1, List of Related Projects, and Figure III-1, in Section III, Environmental Setting, of this Draft EIR.

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

No. ^a	Project Name/Address	Land Use	Unit/Area ^b	Conversion Factor ^c	Service Population ^c	Incidents ^d
^b Based on guidance from LAPD, the analysis focuses on the increased population associated with residential uses. ^c For residents, generation rates of 3.14 persons per unit for Affordable Housing – Family and 2.25 persons per unit for Multi-Family Residential land use categories were used based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020. ^d The estimated number of crimes is based on the 0.004 crime per capita rate currently observed in the Wilshire Community Police Station service area. Source: Eyestone Environmental, 2022.						

Project, individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities.”²⁰ **As such, the Project’s incremental impact would not be cumulatively considerable, and cumulative impacts would be less than significant.**

Additionally, similar to the Project, each related project located in the City would be subject to the City’s routine permitting process, which includes a review by LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as listed in the Regulatory Framework above, 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, LAPD’s resource needs would be identified and monies allocated according to the priorities at the time.²¹ In addition, it is anticipated that the related projects would implement project design features similar to the Project, which would reduce cumulative impacts to police protection services. Furthermore, the Project, as well as the related projects located in the City, 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 facilities and related staffing, as deemed appropriate.

With regard to emergency response, the Project and related projects would introduce new uses in the Project area that would generate additional traffic. Any resulting traffic congestion would have the potential to increase emergency vehicle response times

²⁰ Written correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, March 3, 2022. See Appendix L of this Draft EIR.

²¹ City of Los Angeles, Proposed Budget for the Fiscal Year 2021–22.

to the Project Site and surrounding properties due to travel time delays. As discussed above, the Project is not anticipated to substantially affect emergency response times in the Wilshire Area, and the Project would not contribute to a cumulative impact relative to emergency response times. Furthermore, the drivers of emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

Consistent with the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. At this time, LAPD has not identified any new station construction in the area or planned improvements to the Wilshire Community Police Station. 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 1.0 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or 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.

Based on the above, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

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

(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 or included, and the impact level remains less than significant.