

IV. Environmental Impact Analysis

H.2 Public Services—Police Protection

1. Introduction

This section analyzes whether the Project's new or physically altered police facilities would be required to provide police protection services to the Project, the construction of which could cause significant environmental impacts. The analysis is based, in part, on the information provided by the Los Angeles Police Department (LAPD) dated August 24, 2023, and includes statistical data regarding police protection facilities and services and response times. This information is included in Appendix I of this Draft Environmental Impact Report (Draft EIR). Additional information included in this analysis is also based on the LAPD crime control model computer statistics (COMPSTAT) database and other data on the LAPD website.

2. Environmental Setting

a. Regulatory Framework

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

- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Penal Code
- County of Los Angeles Office of Emergency Management
- City of Los Angeles General Plan
 - Framework Element
 - Wilshire Community Plan
- City of Los Angeles Charter
- Administrative and Municipal Codes

- Los Angeles Police Department Computer Statistics Unit 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 incident/calls.¹ This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear 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*

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.

the California State University (2015) 242 Cal. App. 4th 833 (*City of Hayward*), the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.²

(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.³

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

(3) Local

(a) *City of Los Angeles General Plan*

(i) *Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), originally adopted in December 1996 and re-adopted in August 2001, provides a

² (2015) 242 Cal. App. 4th 833.

³ County of Los Angeles Chief Executive Office, Office of Emergency Management, *About Emergency Management*, <https://ceo.lacounty.gov/emergency-management/#1509664666354-388bbaed-fcaf>, accessed June 19, 2026.

comprehensive vision for long-term growth within the City and guides subsequent amendments of the City's Community Plans, Specific Plans, zoning ordinances, and other local planning programs.

Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.H.2-1 on page IV.H.2-5. Specifically, Chapter 9 (Infrastructure and Public Services) of the General Plan Framework addresses infrastructure and public services, and includes the following relevant goals, objectives, and policies outlined in Table IV.H.2-1. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

(ii) Wilshire Community Plan

The Land Use Element of the City's General Plan includes 34 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Wilshire Community Plan area. The Wilshire Community Plan, adopted on September 19, 2001, describes specific goals and policies related to police protection services and public safety. Policies and objectives relevant to the Project are provided below.

**Table IV.H.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.
Source: City of Los Angeles, 2001.	

Goal 8: Continue to provide the Wilshire community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidence of crime, and provide other necessary law enforcement service

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 requirements.

Objective 8-2: Improve the ability of the community and police department to minimize crime and provide adequate security for all residents.

Policy 8-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with existing policing, foot and bicycle patrols, community watch programs and regular communication with neighborhood and civic organizations.

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 firearms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is also given the power and the duty to protect residents and property and to review and enforce specific security-related mitigation measures in regard to new development.

(d) Los Angeles Police Department Computer Statistics Unit Program

The LAPD 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. The intent of COMPSTAT is to reduce 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.

⁴ LAPD, COMPSTAT, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/, accessed June 19, 2026.

In addition, projects are encouraged to comply with the LAPD's *Design Out Crime Guidelines*, which incorporates techniques of Crime Prevention Through Environmental Design (CPTED) and seeks to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to:

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

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, the West Bureau, the South Bureau, and the Valley Bureau.⁵ These four geographic bureaus are further divided into 21 geographic areas,

⁵ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed June 19, 2026.

which are serviced by the LAPD's 21 community police stations.⁶ Each geographic bureau is comprised of four to seven geographic areas/police stations.⁷

As of August 24, 2023, the departmental staffing resources within the LAPD included 9,001 sworn officers and 2,807 civilian employees. Based on a total City population of 3,822,238, the LAPD has an officer-to-resident ratio of approximately one officer for every 425 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 840,400 residents.⁹ The West Bureau oversees operations in the Hollywood, Wilshire, Olympic, Pacific, and West Los Angeles community police stations, 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 The West Bureau also oversees the West Bureau Homicide.¹¹

(2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within LAPD's Wilshire Division and is served by the Wilshire Community Police Station located at 4861 West Venice Boulevard in Los Angeles, 1.5 miles south of the Project Site, as shown in Figure IV.H.2-1 on page IV.H.2-9. The Wilshire Community Police Station service area covers 13.97 square miles and consists of 57 reporting districts.¹² The Wilshire Division is bordered by the service areas of the Beverly Hills Police Department and LAPD's West Los Angeles Division to the west, the Los Angeles County Sheriff's Department West Hollywood Station and LAPD's Hollywood Division to the north, LAPD's Olympic Division to the east, and LAPD's South Bureau's Southwest Division, and Culver City Police Department to the south. The Project Site is located in Reporting District 0735, which is bounded by Hauser Boulevard to the west, West 6th Street to the north, South La Brea Avenue to the east, and Wilshire Boulevard, South Cloverdale Avenue, and West 8th Street to the south.

⁶ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed June 19, 2026.

⁷ LAPD, *LAPD Organization Chart*, www.lapdonline.org/lapd-organization-chart/, accessed June 19, 2026.

⁸ Written correspondence from Michael R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.

⁹ LAPD, *West Bureau*, www.lapdonline.org/lapd-contact/west-bureau/, accessed June 19, 2026.

¹⁰ LAPD, *West Bureau*, www.lapdonline.org/lapd-contact/west-bureau/, accessed June 19, 2026.

¹¹ LAPD, *West Bureau*, www.lapdonline.org/lapd-contact/west-bureau/, accessed June 19, 2026.

¹² Refer to written correspondence from Michael R. Moore, Los Angeles Police Department, August 24, 2023, included as Appendix I of this Draft EIR for a detailed description of the Wilshire Division's boundaries.

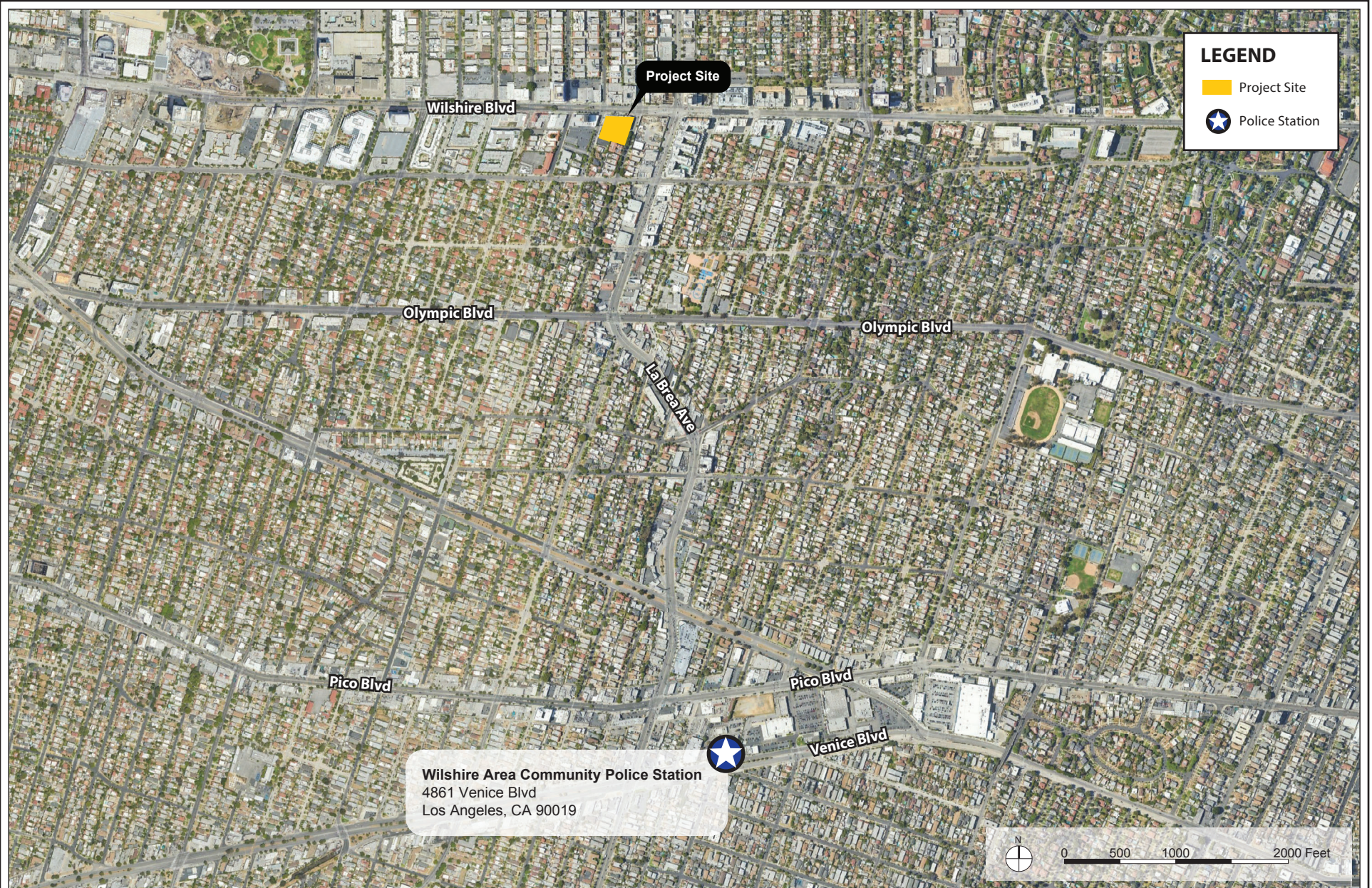


Figure IV.H.2-1
Police Station Serving the Project Site

The Wilshire Community Police Station serves a population of approximately 249,200 residents and is served by 224 sworn officers, 15 sworn reserve police officers, and 10 civilian support staff.¹³ The average response times for the station's emergency—high priority, medium-high priority, and low-priority calls were 4.0, 20.0, and 29.2 minutes, respectively.¹⁴ Citywide, the average response times for emergency—high priority, medium-high priority, and low-priority calls during the same timeframe were 4.7, 16.4, and 31.5 minutes, respectively.¹⁵ Based on the police service population of 249,200 residents, the officer-to-resident ratio of the Wilshire Community Police Station service area is approximately one officer per every 1,042 residents, which is higher than the Citywide ratio of one officer per 425 residents.¹⁶

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (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.

This 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 City's 2006 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to police protection services:

¹³ Written correspondence from Michel R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.

¹⁴ Written correspondence from Michel R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.

¹⁵ Written correspondence from Michel R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.

¹⁶ Written correspondence from Michel R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.

- 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 2006 L.A. CEQA Thresholds Guide, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, new or physically altered government facilities. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station 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 a Project. Project design features that would reduce the impact of the Project on police services are also considered.

The need for, or a 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 that construction could result in a potential impact to the environment, only then would that potential construction impact need to be assessed in that project's CEQA document. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acres and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

c. Project Design Features

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

- POL-PDF-1:** During construction, the Applicant and/or its construction contractor, will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting, locked entry (e.g., padlock gates or guard-restricted access), and regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. During construction activities, the contractor will document the security measures; and the documentation will be made available to the Construction Monitor.
- POL-PDF-2:** During operation, the Project will implement a 24-hour/seven-day security plan incorporating on-site security staff; security cameras; adequate lighting of parking facilities, elevators, pedestrian walkways, building entries, open spaces and lobbies to reduce areas of concealment; design of public spaces to be easily patrolled and accessed by safety personnel; and design of entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.
- POL-PDF-3:** 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 Wilshire Division Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

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 Area since the daytime population generated at the Project Site during construction would be temporary in nature. Construction workers would likely be hired from the large, highly mobile regional construction work force already living and working within the Los Angeles metropolitan region that moves from project to project. The work requirements of most construction projects are

highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Given the temporary duration of construction and the construction labor pool that can be drawn upon in the region, construction workers would not be expected to relocate their residences within this region or move from other regions into this region in response to the short-term Project-related construction employment opportunities and, therefore, no new permanent residents would be generated during construction. Therefore, construction of the Project would not likely increase the permanent residential population in the vicinity of the Project Site.

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 construction areas of the Project Site during construction of the new building. With implementation of these security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Project construction activities could also potentially affect LAPD police protection services and response times within the Wilshire Area due to construction impacts on the surrounding roadways. Specifically, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, on- and off-site 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, a Construction Traffic Management Plan (CTMP) would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1, which is standard practice to ensure that adequate and safe access is available within and near the Project Site during construction activities. As part of the CTMP, the majority of construction-related traffic, including hauling activities, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response to the Project Site and vicinity as 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. Therefore, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would not be impeded. As such, impacts related to emergency access during Project construction would be less than significant.

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

(b) Operation

As previously discussed, the LAPD considers the residential population within their service area to evaluate service capacity. The Project would introduce a new residential and visitor population to the Project Site and would increase LAPD's residential service population in the Wilshire Division. Specifically, as discussed in Section II, Project Description, of this Draft EIR, the Project would develop 419 residential units inclusive of 47 Extremely Low-Income affordable units. Based on LADOT's Vehicle Miles Traveled (VMT) Calculator, the Project would result in a residential population of approximately 986 new residents.¹⁷ Additionally, the Project would include 44,737 square feet of commercial floor area inclusive of 36,737 square feet of restaurant uses and 8,000 square feet of office uses. Based on employee generation factors from the City's VMT Calculator, the Project is estimated to generate approximately 26 net new employees.¹⁸

As discussed above, the Project Site is served by the Wilshire Community Police Station. The residential service population of approximately 986 residents would increase the existing police service population from 249,200 persons to 250,186 persons, which would decrease the officer-to-resident ratio from the current ratio of one officer per 1,042 residents to one officer per 1,046 residents.

As provided above in Project Design Feature POL-PDF-2, the Project would implement a 24-hour/seven-day security plan incorporating on-site security staff; security cameras; adequate lighting of parking facilities, elevators, pedestrian walkways, building entries, open spaces and lobbies to reduce areas of concealment; design of public spaces to be easily patrolled and accessed by safety personnel; and design of entrances to, and

¹⁷ *Fehrs & Peers, Wilshire and Cloverdale Project Transportation Assessment, November 2024 included as Appendix J of this Draft EIR. Generation rates are embedded in the VMT Calculator. The resident generation rate of 2.253 persons per unit for "Multi-Family Residential" land use is applied to 372 new market-rate residential units, the resident generation rate of 3.14 persons per unit for "Affordable Housing—Family" is applied to the 47 affordable residential units.*

¹⁸ *Fehrs & Peers, Wilshire and Cloverdale Project Transportation Assessment, November 2024 included as Appendix J of this Draft EIR. Generation rates are embedded in the VMT Calculator. The employee generation rate of 4.0 employees per 1,000 square feet for "General Office" is applied to the existing and proposed office uses, the employee generation rate of 2.0 employees per 1,000 square feet for "General Retail" is applied to the existing retail uses, and the employee generation rate 4.0 per 1,000 square feet for "High-Turnover Sit-Down Restaurant" is applied to the existing and proposed restaurant uses.*

exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites. Furthermore, as specified in Project Design Feature POL-PDF-3, 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. These features would help offset the Project-related increase in demand for police services and minimize the need for new or altered facilities.

In addition to the implementation of the above 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.

LAPD also makes the following conclusions in its August 24, 2023, correspondence regarding the police protection impacts of the Project:

... at this time, there are no special police protection requirements needed by law enforcement because of the specific attributes of the Wilshire and Cloverdale Project site.

The response times stated are adequate performance times for this police division.

The Wilshire and Cloverdale Project, individually or combined with other past or present projects, will not result in the need for new or altered police facilities.

With regard to Project operational impacts on police emergency response times, 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, the drivers of police emergency vehicles have the ability of circulating around traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. In addition, as is the case under existing conditions, emergency vehicles would access the Project Site directly from the surrounding roadways. As discussed in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site would be provided via two, two-way driveways along Cloverdale Avenue and Detroit Street. 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. 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. Additionally, operation of the Project would not include the installation of barriers

in the vicinity of the Project Site that could impede emergency access in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Moreover, consistent with *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the above, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Therefore, impacts with regard to police protection services would be less than significant.

(2) Mitigation Measures

Project-level impacts related 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.

e. Cumulative Impacts

Cumulative growth in the greater Project area through 2029 (i.e., 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 five related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project No. 1 through No. 5 is a conservative assumption, as some of the related projects may not be built out by 2029, may never be built, or may be approved and built at reduced densities. Additionally, much of this growth is anticipated by the City and is incorporated into the Wilshire Community Plan. To provide a conservative forecast, the future baseline forecast assumes that Related Project No. 1

through No. 5 are fully built out by 2029, unless otherwise noted. All five of the related projects fall within the boundaries of the Wilshire Area and are served by the Wilshire Area Community Police Station, which include residential uses.

(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 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 CTMP, pursuant to Project Design Feature TR-PDF-1, 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. Additionally, the Project Site vicinity and the Wilshire Community Plan area in general are urbanized areas, with access to police and emergency services provided by various existing police stations in the area. Furthermore, 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 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. 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.H.2-2 on page IV.H.2-18 the residential component of the related projects would generate approximately 7,421 residents. Thus, the Project's estimated 986 residents together with the residents calculated for the related projects would result in an estimated increase of 8,407 residents in the Wilshire Division. It is noted that the estimated number of residents associated with the related projects is conservative because the estimates do not account for the removal of existing uses and their associated existing resident and employee populations resulting from the development of the related projects. Notwithstanding, when considering these estimates, the Wilshire Division's police service population would increase from 249,200 residents to 257,607 residents with both the Project and the related projects. This would decrease the officer-to-resident ratio in the

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

No. ^a	Project Name/Address ^b	Land Use	Unit/Size	Service Population	Residential Service Population
1	Mirabel Transit Priority Project 688 S. Cochran Avenue (5411 Wilshire Boulevard)	Multi-family	348 du	783	783
		Retail	5,000 sf	10	
		Restaurant	6,000 sf	24	
2	Wilshire Courtyard Redevelopment Project (Residential Option) ^c 5700 Wilshire Blvd	Residential	2,586 du	5,819	5,819
		Restaurant	24,427 sf	98	
		Supermarket	34,000 sf	136	
		Office	445,627 sf	1,783	
3	629 La Brea Avenue	Multi-family	121 du	272	272
		Retail	13,000 sf	26	
		Hotel	125 rm	63	
4	5001 Wilshire Boulevard	Multi-family	243 du	547	547
		Retail	11,000 sf	22	—
Related Projects Service Population				9,583	—
Project Total Service Population (Net Increase)				1,012	—
Total Service Population for Related Projects and Project				10,595	—
Related Projects Residential Service Population					7,421
Project Residential Service Population					986
Total Residential Service Population for Related Projects and Project					8,407
du = dwelling units rm = rooms sf = square feet					
^a Map No. corresponds to Table III-1, Related Projects, Figure III-1, Related Projects Location Map in Section III, Environmental Setting, of this Draft EIR.					
^b The Metro D Line Extension project (Related Project No. 5 in Section III, Environmental Setting, of this Draft EIR) would not generate a residential population. As such, it is not included in the analysis.					
^c This related project includes both an office option and residential option. The residential option is analyzed herein because it would directly increase the police service population.					
Source: Eyestone Environmental, 2026.					

Wilshire Division from the current ratio of one officer per 1,042 residents to an estimated one officer per 1,078 residents.

While the Project and the related projects would increase the demand for LAPD services and facilities, the Project would implement Project Design Features POL-PDF-2 and POL-PDF-3, which together would minimize Project demand for LAPD services/facilities during operation. 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 addition, 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 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. 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 potentially be applied by the City toward the provision of new facilities and related staffing, as deemed appropriate by the City.

With regard to police emergency access, the Project, related projects, and other future development within the Wilshire Community Plan area would introduce new uses that would generate additional traffic in the vicinity of the Project Site. The Project is not anticipated to substantially affect existing emergency response in the Wilshire Division, and therefore would not contribute to a cumulative impact regarding emergency response. Furthermore, as previously discussed, 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, in accordance with CVC Section 21806. The Project also would not include the installation of barriers surrounding the Project Site which could impede emergency vehicle access. The related projects would similarly be reviewed by the LAPD to ensure the design does not compromise emergency vehicle access to and surrounding the related project sites. As such, the Project would not contribute to a cumulative impact regarding emergency access.

Overall, as concluded by the LAPD, the Project, individually, or combined with other past or present projects, would not result in the need for new or altered police facilities.¹⁹ Lastly, consistent with *City of Hayward v. Board of Trustees of the California State University* and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City.²⁰ 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

¹⁹ Written correspondence from Michel R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.

²⁰ (2015) 242 Cal.App.4th 833.

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.”²¹ 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 likely be located on parcels that are infill opportunities on lots that are between 0.5 and one 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. 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’s 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 (i.e., police), the construction of which would cause significant environmental impacts, in order to maintain service. As such, Project impacts on police protection facilities would not be cumulatively considerable and, therefore, the Project’s cumulative impacts 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.

²¹ *Written correspondence from Michel R. Moore, Los Angeles Police Department, August 24, 2023. See Appendix I of this Draft EIR.*