

IV. Environmental Impact Analysis

I.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 April 28, 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. 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;
 - Community Plan;
- City of Los Angeles Charter;
- Administrative and Municipal Codes;
- Los Angeles Police Department Computer Statistics Unit 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 incident/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 provide public safety

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.

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

(3) Local

(a) City of Los Angeles General Plan

(i) Framework Element

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

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 October 30, 2023.

Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.I.2-1 on page IV.I.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.I.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 Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications, and the locations and characteristics of public service facilities.

The Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988,³ does not include any objectives or policies that specifically relate to police protection.

³ On May 3, 2023, the Los Angeles City Council adopted the Hollywood Community Plan Update. Following adoption of the updated Hollywood Community Plan, the implementing ordinances will be reviewed and finalized by the City Attorney, to ensure clarity of regulations and consistency with state law, which can take approximately six months to a year. After this process is complete, the updated Hollywood Community Plan will be brought into effect by the City Council.

**Table IV.I.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.	

(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 Computer Statistics Unit (COMPSTAT) Program was created in 1994 and implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. 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. 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;

⁴ LAPD, COMPSTAT, www.lapdonline.org/office-of-the-chief-of-police/office-of-special-operations/detective-bureau/compstat-division/, accessed October 30, 2023.

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

As of April 2023, the departmental staffing resources within the LAPD included 9,069 sworn officers.⁸ Based on a total City population of approximately 3,985,516, the LAPD currently has an officer-to-resident ratio of approximately one officer for every 439 residents.⁹

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.¹⁰ The West Bureau oversees operations in the Hollywood, Wilshire, Pacific and West Los Angeles service areas.¹¹ The West Bureau also oversees the West Traffic Division, which includes

⁵ LAPD, *LAPD Organization Chart*, <https://www.lapdonline.org/lapd-organization-chart/>, accessed October 30, 2023.

⁶ LAPD, *LAPD Divisions by Bureau*, August 30, 2021.

⁷ LAPD, *LAPD Organization Chart*, <https://www.lapdonline.org/lapd-organization-chart/>, accessed October 30, 2023.

⁸ *Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023.*

⁹ *The City population referenced in this section is current as of October 1, 2021, according to 2010-2020 American Community Survey and the 2020 US Census for the year 2020, consistent with the Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR.*

¹⁰ LAPD, *About West Bureau*, <https://www.lapdonline.org/lapd-contact/west-bureau/>, accessed October 30, 2023.

¹¹ LAPD, *About West Bureau*, <https://www.lapdonline.org/lapd-contact/west-bureau/>, accessed October 30, 2023.

the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.¹²

(2) LAPD Community Police Station

Within the Hollywood Division, the Project Site is served by the Hollywood Community Police Station, located at 1358 Wilcox Avenue, approximately 1 mile southwest of the Project Site. The location of the police station that serves the Project Site is shown in Figure IV.I.2-1 on page IV.I.2-9. The Hollywood Community Police Station has a service area of approximately 17.2 square miles and serves the neighborhoods of Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue, and Los Feliz Estates.^{13,14} The Hollywood Division includes a service population of approximately 300,000 persons and is staffed by approximately 302 sworn officers and 15 civilian support staff.¹⁵ As such, the officer-to-resident ratio in the Hollywood Division is 1 officers per every 993 residents and is lower than the Citywide ratio of 1 officers per 439 residents.

As of May 2023, based on a four-week period between March 19, 2023, to April 15, 2023, the average response time for emergency, high priority calls in the Hollywood Division was 3.7 minutes, 13.6 minutes for medium high priority calls, and 27.8 minutes for non-emergency calls.¹⁶ The average response time Citywide during the same four-week period was 4.7 minutes for emergency, high priority calls, 15.4 minutes for medium high priority calls, and 29.1 minutes for non-emergency calls.¹⁷

¹² LAPD, *About West Bureau*, <https://www.lapdonline.org/lapd-contact/west-bureau/>, accessed October 30, 2023.

¹³ LAPD, *About Hollywood*, <https://www.lapdonline.org/lapd-contact/west-bureau/hollywood-community-police-station/>, accessed October 30, 2023.

¹⁴ *Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR*

¹⁵ *Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR.*

¹⁶ *Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR.*

¹⁷ *Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR.*

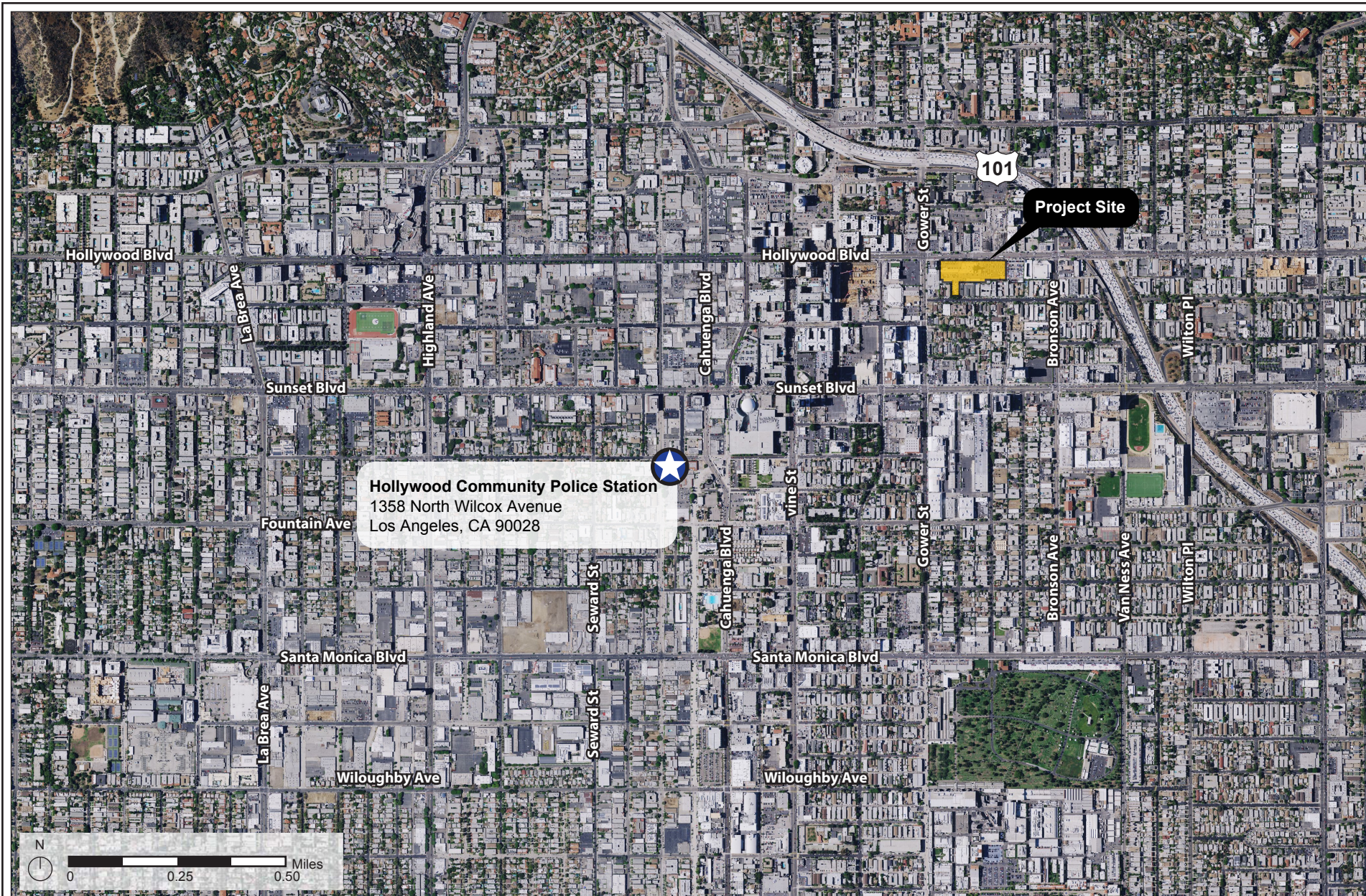


Figure IV.I.2-1
Police Station Serving the Project Site

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.

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 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 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 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 acre 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:

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

Project Design Feature POL-PDF-2: During operation, the Project shall incorporate a 24-hour/seven-day security plan to ensure the safety of its residents and site visitors. The Project's security plan could include, but not be limited to, the following design features:

- Installing and utilizing a 24-hour security camera network throughout the underground parking structure, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces;
- Controlling access to all building elevators, residences, and resident-only common areas;
- Maintaining staff on-site, including at the lobby concierge desk and within the car valet area. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed; and
- Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property.

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

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

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

Project Design Feature POL-PDF-6: The Applicant will consult with LAPD regarding the incorporation of feasible crime prevention features. Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Hollywood Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Community Police Station. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of the existing commercial buildings on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. Notwithstanding, 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 listed above, the Applicant would implement temporary security measures during construction, including security fencing, lighting, and locked entry to secure the Project Site during

construction. With implementation of these security measures, potential impacts associated with theft and vandalism during construction activities would be reduced, resulting in less demand for police protection services and associated government facilities.

Project construction activities could also potentially impact LAPD police protection services within the Hollywood Division by adding construction traffic to the street network and by necessitating partial lane closures for installation of required utility and street improvements. However, 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. In addition, as discussed in Section IV.J, 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. Additionally, given standard construction industry working hours, it is anticipated that 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. As part of the Construction Traffic Management Plan, 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 impede the ability of the LAPD to respond to emergencies in the vicinity of the Project Site as emergency vehicles are generally able 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 would not result in the need for new or physically altered police protection 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 Hollywood Division. As discussed in Section II, Project Description, of this Draft EIR, the Project would develop 350 residential units inclusive of 306 market-rate units and 44 affordable housing units. Based on generation factors from the LADOT's Vehicle Miles Traveled (VMT) Calculator Documentation of 2.25 residents per unit, the development of 306 market-rate residential units would result in a net increase of approximately 689 residents.¹⁸ In addition, applying the City's VMT Calculator Documentation factor for

¹⁸ City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

affordable housing of 3.14 persons per unit for the Project's 44 affordable housing units would result in the increase of approximately 138 persons.¹⁹ Therefore, the Project would result in a net residential population of 827.²⁰ Additionally, based on employee generation factors from the City's VMT Calculator Documentation, the Project is estimated to generate 532 net new employees to the Project Site.^{21,22}

As discussed above, the Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, approximately 1 mile southwest of the Project Site. The Hollywood Community Police Station is staffed by 302 sworn officers and 15-person civilian support staff. The residential service population of 827 residents would increase the existing police service population in the Hollywood Division from 300,000 persons to 300,827 persons, which would decrease the officer-to-resident ratio from the current ratio of 1 officer per 993 residents to 1 officer per 996 residents.

As provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a 24-hour/seven-day security plan to ensure the safety of its residents and site visitors. The Project's security plan could include a 24-hour security camera network throughout the Project, controlling access to all buildings, maintaining all staff on-site, and training staff on security policies for the Project's buildings. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of the buildings, walkways, and parking areas to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the buildings. The Project would also design entrances to and exits from the buildings and open spaces around the building to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6, the Applicant would consult with LAPD regarding the incorporation of feasible crime prevention features and submit a diagram of the

¹⁹ LADOT and Los Angeles Department of City Planning, *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The Affordable Housing - Family Residential factor of 3.14 persons per unit is applied to the 44 affordable housing units ($44 * 3.14 = 138$ persons).

²⁰ Accounting for both market-rate and affordable housing units, the Project would produce an estimated total of 827 persons ($689 + 138 = 827$).

²¹ LADOT and Los Angeles Department of City Planning (DCP), *City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020*. The existing commercial uses to be removed produce approximately 64 employees (commercial 31,833 square feet * 0.002). The Project would produce 600 employees (office 136,000 square feet * 0.004 = 544) + (retail 18,004 square feet * 0.002 = 36) + (restaurant 4,038 square feet * 0.004 = 16). Therefore, the Project would produce approximately 532 net new employees.

²² The existing occupied uses to be removed include commercial uses, including Toyota of Hollywood as well as low rise buildings and parking areas.

Project Site to the LAPD showing access routes and other information that might facilitate police response.

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. The Project's design features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police protection services.

The Project would introduce new uses to the Project Site which would generate additional traffic in the vicinity of the Project Site. 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, including emergency vehicle access, to the Project Site would be provided from three driveways along Hollywood Boulevard with additional access from Carlton Way. 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. Additionally, operation of the Project would not include the installation of barriers in the vicinity of the Project Site (e.g., perimeter fencing, fixed bollards, etc.) 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.

Overall, as concluded in the written correspondence from LAPD, there are currently no planned improvements to the Hollywood Community Police Station and/or its protection facilities. Additionally, LAPD determined that at this time there are no special police protection requirements needed by law enforcement because of the specific attributes of the Project. Lastly, LAPD concluded that the Project, individually, or combined with other past or present projects, would not result in the need for new or altered police facilities.²³

Moreover, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need

²³ Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR.

for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Based on the above analysis, Project operation would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Therefore, impacts with regard to police protection services would be less than significant.

(2) Mitigation Measures

Project-level impacts 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. Cumulative Impacts

Cumulative growth in the greater Project area through 2029 (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 15 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Projects No. 1 through 15 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. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 15 are fully built out by 2029.

Additionally, the Hollywood Community Plan Update, which was recently adopted, is a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2029, well before the Hollywood Community Plan Update's horizon year. It can also be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update.

(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 construction management plan 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. Furthermore, the Project Site vicinity and general Hollywood Community Plan area are urbanized areas, where several police stations are available in proximity to serve the Project Site and related project sites. 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.1.2-2 on page IV.1.2-18, based on the household size factor of 2.25 persons per household, the residential component of the related projects would generate approximately 27,697 residents.

As described above, the Project would contribute to this cumulative increase by generating a service population of approximately 827 residents. As such, the 27,697 residents generated by the related projects plus the Project's 827 residents would result in an estimated increase of 28,524 residents in the Hollywood 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 Hollywood Division's police service population would increase from 300,000 residents to 328,524 residents with both the Project and the related projects.

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 through POL-PDF-6, which together would minimize Project demand for LAPD services/

**Table IV.I.2-2
Estimated Service Population from Related Projects within the Hollywood Division**

No.^a	Project Location	Land Use	Unit/Area^b	Service Population
1	6400 Sunset Boulevard	Apartments	200 du	450
		Commercial	7,000	14
2	6350 Selma Avenue	Apartments	260 du	585
		Commercial	6,790 sf	14
3	6050 Sunset Boulevard	Office	560,692 sf	2,243
		Production Support	28,250 sf	113
		Soundstages	30,000	120
		Mill Space	7,000	28
4	6061 Sunset Boulevard.	Office	489,863 sf	1,959
		Restaurant/Event Space	19,915 sf	80
		Screening Room	14,256 sf	57
5	1360 Vine Street	Residential (Residential Option)	429 du	965
		Grocery Store (Residential Option)	55,000 sf	220
		Retail (Residential Option)	5,000 sf	10
		Reuse of Bungalows (Residential Option)	8,988 sf	20,223
		Office (Office Option)	463,521 sf	1,854
		Restaurant (Office Option)	11,914 sf	48
		Reuse of Bungalows (Office Option)	8,988 sf	36
6	6407 Sunset Boulevard	Hotel	275 rm	138
		Retail	1,900 sf	4
7	6100 Hollywood Boulevard	Apartments	220 du	495
		Retail	3,270 sf	7
8	1546 Argyle Avenue	Apartments	276 du	621
		Retail (Option 1)	24,000 sf	48
		Retail (Option 2)	27,000 sf	54
9	6220 Yucca St	Apartments	269 du	605
		Retail	7,760 sf	16
10	1720 Vine Street	Apartments	1,005 du	2,261
		Retail	30,000 sf	60
		Other	350 per	1
11	6360 Hollywood Boulevard	Hotel	57 rm	29
12	1400 Vine Street	Apartments	198 du	446
		Retail	16,000 sf	32

Table IV.I.2-2 (Continued)
Estimated Service Population from Related Projects within the Hollywood Division

No. ^a	Project Location	Land Use	Unit/Area ^b	Service Population
13	6007 West Sunset Boulevard	Apartments	109 du	245
		Other	14,657 sf	59
14	1725 North Bronson Avenue	Apartments	129 du	290
15	6266 West Sunset Boulevard	Apartments	153 du	344
		Retail	13,026 sf	26
Related Projects Total Service Population				34,800
Project Total Service Population				1,359
Total Service Population for Related Projects and Project				36,159
Related Projects Residential Service Population				27,697
Project Residential Service Population				827
Total Residential Service Population for Related Projects and Project				28,524
<hr/>				
du = dwelling units				
sf = square feet				
^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.				
^b Based on guidance from the LAPD, the analysis focuses on the increased population associated with residential uses.				
Source: Eyestone Environmental, 2024.				

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 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, 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.²⁴ Lastly, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City.²⁵ Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area and has concluded that the Project "individually or combined with other past, present or future projects, will not result in the need for new or altered police facilities."²⁶ 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 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or be reviewed in a Mitigated Negative Declaration. 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 contribution to cumulative operational impacts to police protection services would not be cumulatively considerable. The Project would not result in cumulative adverse impacts associated with the provision of new or physically altered government facilities (i.e., police), need for new or physically altered governmental facilities, the construction of which would cause

²⁴ Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, May 11, 2023. See Appendix I of this Draft EIR.

²⁵ (2015) 242 Cal.App.4th 833.

²⁶ Written Correspondence from Alfonso Velasco, Public Engagement Section and Crime Prevention Through Environmental Design Section, Los Angeles Police Department, April 28, 2023. See Appendix I of this Draft EIR.

significant environmental impacts, in order to maintain service. As such, cumulative impacts on police protection services would be less than significant.

(2) Mitigation Measures

Cumulative impacts 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.