

From: Casey Maddren <cmaddren@gmail.com>
Sent time: 06/01/2020 12:21:12 PM
To: mindy.nguyen@lacity.org
Cc: Casey Maddren <cmaddren@gmail.com>
Subject: Hollywood Center DEIR, Case Number: ENV-2018-2116-EIR, Comments from UN4LA
Attachments: Hlwd Ctr EIR UN4LA Comments FINAL W ATTACHMENTS.pdf

Dear Mindy,

I'd like to submit the attached comments on the Hollywood Center DEIR on behalf of United Neighborhoods for Los Angeles (UN4LA).

Could you please send me a quick response to let me know you received the comment letter? And could you also please add me to the distribution list for future communications on this project?

Thanks,
Casey Maddren
United Neighborhoods for Los Angeles



United Neighborhoods for Los Angeles

www.un4la.com

UN4LA Board

Casey Maddren, President

Cherilyn Smith, Treasurer

Richard Platkin, Secretary

Annie Gagen

Jack Humphreville

Kim Lamorie

Gina Thornburg

Grace Yoo

May 31, 2020

Mindy Nguyen
Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
mindy.nguyen@lacity.org

Re: Hollywood Center Project DEIR,
Case Number: ENV-2018-2116-EIR
1720-1724, 1740-1768, 1745-1753, 1770 N. Vine; 1746-1764 N. Ivar;
1733- 1741 N. Argyle; 6236, 6270, 6334 W. Yucca

Dear Ms. Nguyen,

United Neighborhoods for Los Angeles (UN4LA) is a community group formed to foster better planning and better government within the County of Los Angeles, and all cities and unincorporated areas contained within the County's borders. UN4LA's goal is to reach out to all the diverse communities of Los Angeles County and partner with them on issues of concern to them. UN4LA's primary areas of focus are planning, development, budget/finance, environment/open space, and ethics,

We have reviewed the DEIR for the Hollywood Center Project. Our comments are below.

Sincerely,
Casey Maddren, President
United Neighborhoods for Los Angeles

HOLLYWOOD CENTER PROJECT

DEIR COMMENTS

The DEIR is deficient in many respects, and fails in numerous ways to address the Project's impacts and its compliance with the California Environmental Quality Act. It also presents inaccurate and misleading information in the chapters on Public Services/Police and Solid Waste.

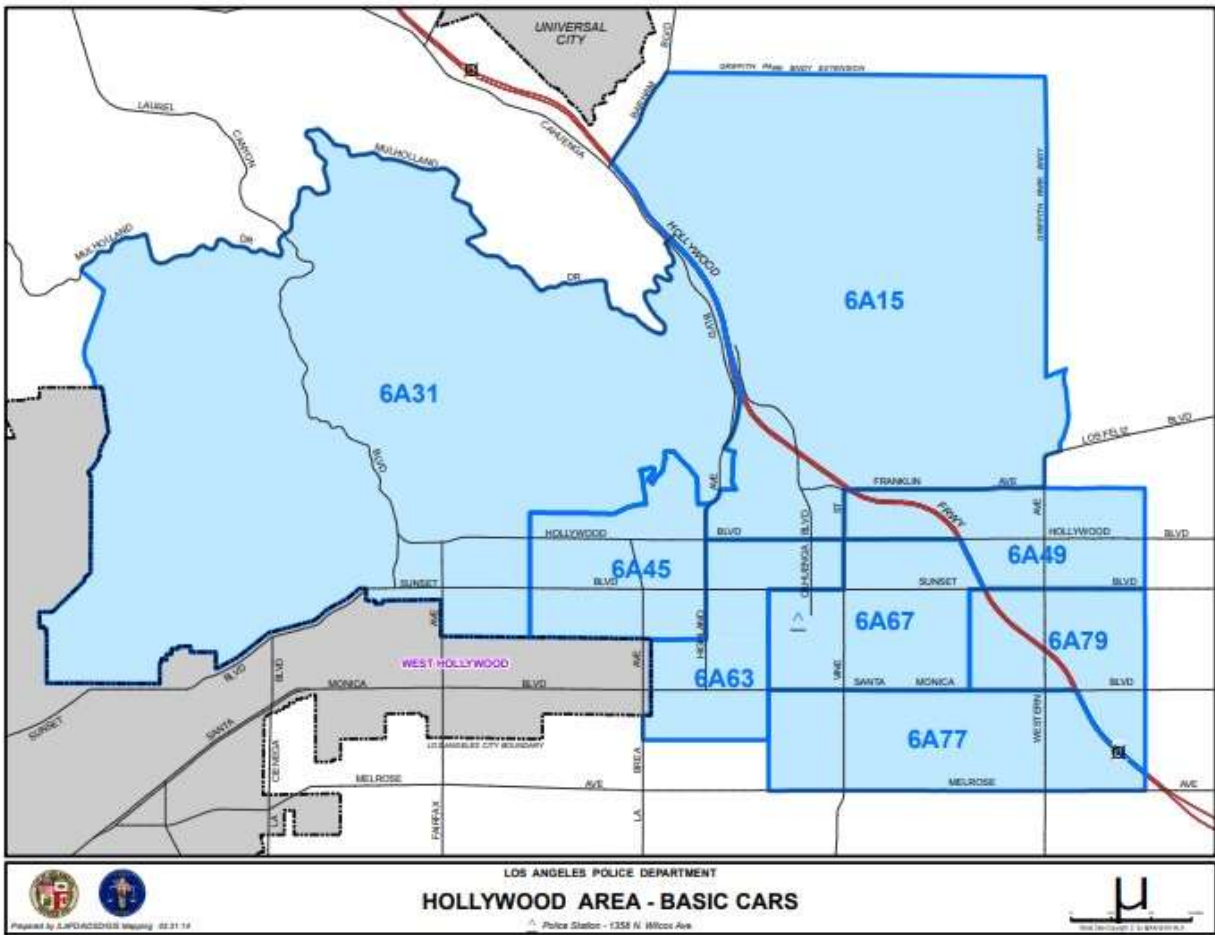
Public Services/Police

The Hollywood Center DEIR continues the City's on-going practice of using false and/or incomplete data to make it appear that the crime rate in Hollywood is lower than it really is. First, we analyze the Hollywood DEIR's grossly inaccurate claims regarding the per capita crime rate in Hollywood. Next, we offer a summary of other recent environmental assessments for Hollywood area projects to demonstrate that this is part of an on-going pattern, and that the City appears to be conspiring with developers to present inaccurate and misleading data to create the impression that the crime rate in Hollywood is the same as or less than the Citywide crime rate.

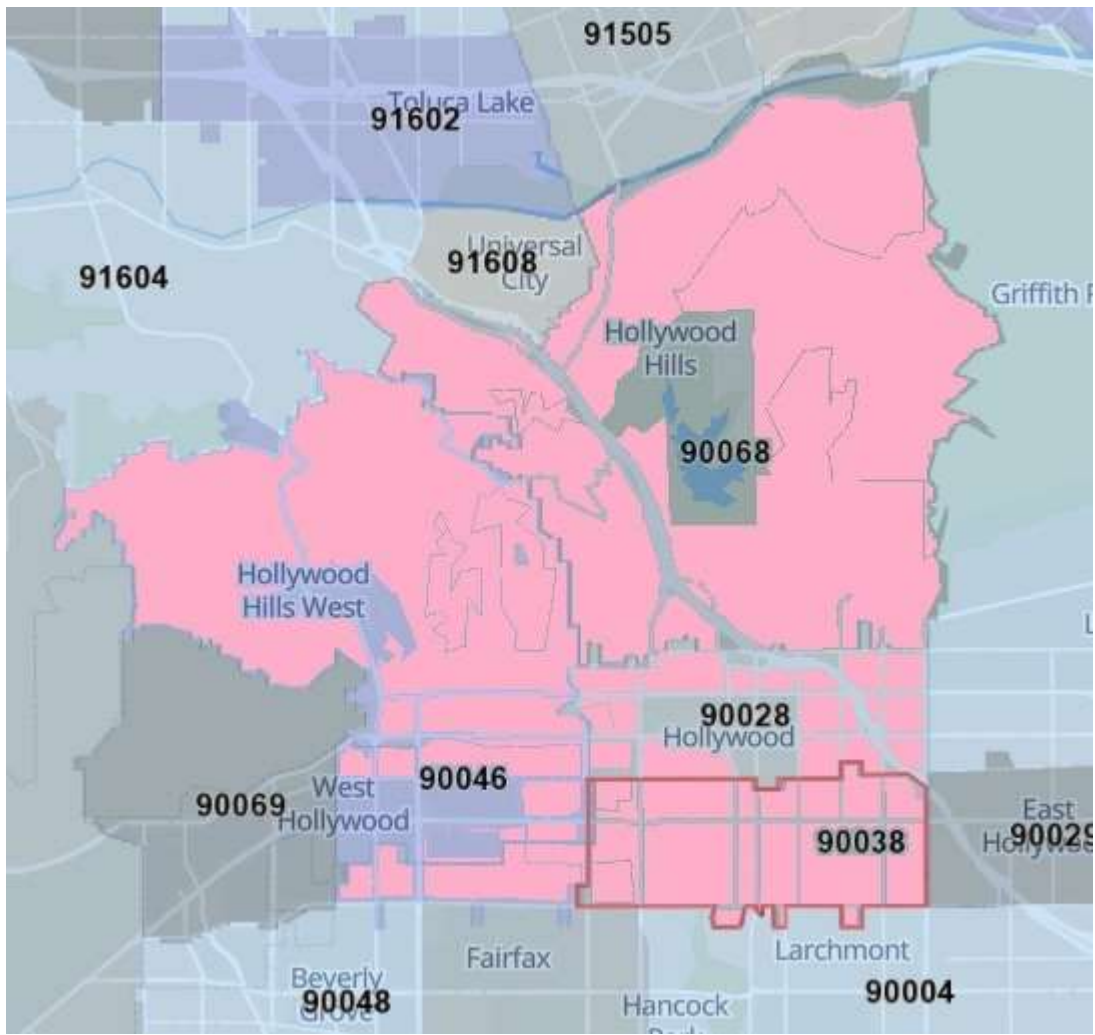
To begin with, let's address the population numbers consistently used in Hollywood area EIRs as the basis for calculating per capita crime rate. Up through the release of the Hollywood Gower DEIR in September 2018, environmental assessments for the Hollywood area stated that the LAPD's Hollywood Division served an area with a population of 165,000. But since the release of the Hollywood Community Plan Update DEIR in November 2018, environmental assessments published for the Hollywood area have consistently stated that the Hollywood Division serves an area with a population of 300,000.

This is a huge difference. Which population estimate is correct? I sent a PRA request to the LAPD, but did not receive a response before the deadline for comments on the Hollywood Center DEIR. So I tried to arrive at an estimate of the population served by the Hollywood Division by calculating the population for the four major zip codes which are contained within the Hollywood Division service area.

Here is a map of the Hollywood Division service area from the LAPD's web site:



Here is a map of the four major zip codes, 90028, 90068, 90046 and 90038, within the Hollywood Division service area:



While the area covered by the two maps is not exactly the same, these four zip codes roughly coincide with the boundaries of the area served by the Hollywood Division.

Here is a calculation of the population and the number of square miles contained within these four zip codes:

HOLLYWOOD DIVISION			
ZIP CODES, POPULATION & SQUARE MILEAGE			
Zip Code	Population	Area	Square Miles
90028	30734	Central Hollywood	1.5
90068	20982	Hollywood Hills East	7.6
90046	50587	Hollywood Hills West	5.8
90038	27660	Santa Monica to Melrose	1.6
TOTAL	129963		16.5
Population Data from American Community Survey 2018 ACS 5-Year Estimates Data Profiles			
Zip Code Geographic Size Info from ProximityOne.com			

While the total population of 129,963 is below the 165,000 figure used by the City in older environmental assessments, the area covered by these four zip codes is 16.5 square miles, which is somewhat less than the 17.2 square miles most commonly given as the area served by the Hollywood Division. And since the additional area covered by the Hollywood Division is fairly small, it seems highly unlikely that it contains the additional 170,000 people which would be necessary to support the City's claim that Hollywood Division serves 300,000 people.

By using both inflated population figures and inaccurate crime statistics, the City has consistently portrayed the per capita crime rate in Hollywood as far lower than it really is.

Below is our analysis of the Public Services/Police section of the Hollywood Center DEIR, followed by analyses of a number of recent DEIRs for Hollywood area projects, listed in descending order.

See Attachment A for excerpts from Hollywood Center DEIR and other DEIRs cited for their analyses of Public Services/Police impacts.

Hollywood Center DEIR

Says Hollywood Division serves approximately 300,000 persons and covers 17.2 sq. mi..

The DEIR says that 4,630 crimes were committed in the Hollywood area in 2017.

The DEIR says that 129,587 crimes were committed Citywide in 2017.

COMPSTAT totals show 6,240 crimes were committed in the Hollywood area in 2017, 1,610 higher than the number given by the DEIR.

COMPSTAT totals show 129,587 crimes were committed Citywide in 2017, the same as the number given by the DEIR.

The DEIR calculates a 0.015 per capita crime rate in Hollywood based on a service area population of 300,000.

The DEIR calculates a 0.032 per capita crime rate Citywide.

In other words, the DEIR claims that the per capita crime rate in Hollywood is less than half the Citywide crime rate.

Calculations made using the actual COMPSTAT totals and a population total of 165,000 for Hollywood Division show a 0.037 per capita crime rate for Hollywood.

Calculations made using the actual COMPSTAT totals show a 0.031 per capita crime rate Citywide, the same as the total given in the DEIR.

In other words, when we use the actual crime totals given by the LAPD's COMPSTAT reports, we find that the per capita crime rate in Hollywood is more than double the rate claimed by the DEIR, and significantly higher than the per capita crime rate Citywide.

The Hollywood Center DEIR's gross misrepresentation of the crime rate in Hollywood shows that its analysis of project impacts on Police services is completely illegitimate, and the same can be said for its analysis of cumulative impacts.

Hollywood & Wilcox DEIR, February 2020

Says Hollywood Division serves approximately 300,000 persons and covers approximately 17 sq. mi.

Says 6,223 crimes reported in Hollywood Division in 2019.

Says 120,828 crimes reported Citywide in 2019.

The DEIR calculates a 0.0207 per capita crime rate for Hollywood based on a population of 300,000.

The DEIR calculates a 0.0300 per capita crime rate Citywide.

Calculations made using correct Hollywood Division population estimate of 165,000 shows a per capita crime rate of 0.037, substantially higher than the per capita crime rate given in the DEIR for Hollywood, and also substantially higher than the Citywide rate.

Citizen M DEIR, June 2019

The Public Services/Police section runs less than two pages and presents no information on the size of the population served by the Hollywood Division, the number of crimes committed per capita or the number of officers per population.

The DEIR acknowledges that the project could generate up to 360 visitors on the project site, plus plus up to 83 employees, but says that because the project includes no residential uses, "[...] the Project would not directly affect the existing officer-to-resident ratio or the crimes per

resident ratio [...]" within the Hollywood Division service area.

The DEIR makes no meaningful attempt to assess crime impacts resulting from the project.

The DEIR makes no attempt at all to assess cumulative impacts from other projects planned for the Hollywood area.

Modera Argyle DEIR, April 2019

Says the Hollywood Division serves 300,000 persons and covers 17.2 sq. mi..

The statistics cited by the EIR are substantially incorrect and do not represent that actual crime rate in the Hollywood area.

For some reason Table IV.F.2-1, 2018 Part I Crimes—Hollywood Area and Citywide, cites the COMPSTAT Hollywood Area Profile dated 12/01/18 and the COMPSTAT Citywide Profile dated 12/08/18.

Since these only show crime stats through early December, they do not give a complete picture of crime states Citywide or in Hollywood for the year 2018.

Here is the crime data as presented in the EIR:

	Crimes	Population	Crimes Per 1,000 Persons	Crimes Per Capita
Hollywood	5,838	300,000	19.5	0.0195
Citywide	119,214	4,007,147	29.8	0.0298

The COMPSTAT Citywide and Hollywood Profiles dated 12/29/18 show significantly higher totals for Hollywood and the City at the end of 2018.

Hollywood 6,332

Citywide 127,609

Calculations made using the correct COMSTAT data for the full year show a 0.038 per capita crime rate for the Hollywood area.

Calculations made using the correct COMSTAT data for the full year show a 0.032 per capita crime rate Citywide.

The Modera Argyle DEIR uses inaccurate population data and inaccurate crime statistics to claim that the crime rate in Hollywood is well below the Citywide crime rate. In fact, the crime rate is far higher in Hollywood.

Hollywood Community Plan Update DEIR, November 2018

In DEIR Section Project Description says that in 2016 the Hollywood Community Plan Area (CPA population is 206,000 and that the Hollywood CPA covers 21.8 sq. mi.

In DEIR section Public Services says Hollywood Division serves 300,000 and covers 17.2 square miles

Says 5,830 crimes reported in Hollywood Division in 2016. This matches COMSTAT data for 2016.

Says 125,430 crimes reported Citywide in 2016. This also matches COMSTAT data for 2016.

Does not calculate crimes per 1,000 persons or crimes per capita.

On page 25 of Public Services section of DEIR makes the following statement:

"The population is expected to be approximately 243,000 to 264,000 residents by year 2040, which would be a population increase of approximately 37,000 to 58,000 residents compared to the estimated 2016 population."

The DEIR claims that the Hollywood Division, which covers 17.2 sq. mi., serves 300,000 residents.

But the DEIR Project Description says that the entire Hollywood CPA, which covers 21.8 sq. mi., contains 206,000 residents.

In other words, the DEIR is telling us that the Hollywood Division serves 94,000 more residents (nearly 50% more) than are contained within the entire Hollywood CPA, even though the Hollywood CPA contains the entire Hollywood Division plus parts of the Northeast, Rampart, North Hollywood, Olympic and Wilshire Divisions.

Hollywood & Gower DEIR, September 2018

Says Hollywood Division serves 165,000 persons and covers 13.34 sq. mi..

The Public Services/Police section of the DEIR states:

"Based on the residential service population of the Hollywood Community Police Station, approximately 2.7 crimes per 1,000 residents (0.027 crime per capita) were reported in the Hollywood Community Police Station service area and 27 crimes per 1,000 residents (0.027 crime per capita) were experienced citywide."

Table IV.K.2-1 shows a per capita crime rate of 0.027 for the Hollywood area and 0.27 for the City as a whole.

This makes it appear that the crime rate in Hollywood is one tenth of the Citywide crime rate. The City later acknowledged that the figures cited in the EIR are incorrect, but staff claimed the error is merely typographical and published an errata which revised the numbers to say that the

per capita crime rate for the Hollywood area was 0.027, the same as the Citywide rate.

But this is still incorrect. Actually, the crime statistics cited in the DEIR do not accurately reflect crime stats actually published by the LAPD for the year 2016.

The EIR states....

"As shown therein, based on the most recent data made available by the LAPD Community Relationship Division and COMPSTAT for the year 2016, approximately 4,450 crimes were reported within the Hollywood Community Police Station service area and 107,570 crimes were reported citywide."

In fact, the COMPSTAT report for Hollywood for 2016 shows a total of 5,830 Part I crimes.

The COMPSTAT report for Citywide crime stats for 2016 shows a total of 125,430 Part I crimes.

What is the reason for this discrepancy? If we look at a footnote included in Table IV.K.2-1 we see that the numbers were taken from the LAPD COMPSTAT profile dated November 12, 2016.

In other words, the crime rates for Hollywood and the City were calculated using statistics that did not cover the last 49 days of the year.

The per capita crime rates for both Hollywood and the City were calculated using statistics for only 87% of the calendar year.

If we calculate using the numbers actually given in LAPD's COMPSTAT reports, we find that the Citywide per capita crime rate is 0.0316 and that the Hollywood rate is 0.0353, about 10% higher.

Citywide 2016

Population
3,962,726

Total Part I Crimes
125,430

0.0316 per capita

Hollywood 2016

Population
164,736

Total Part I Crimes
5,830

0.0353 per capita

It is clear when we calculate the totals using statistics for the complete year that the crime rate in Hollywood is substantially higher than the Citywide rate.

The use of crime statistics only through November 12, 2016 appears to be a deliberate decision by the authors to falsify crime rates for the Hollywood area.

Crossroads Hollywood DEIR, May 2017

Says Hollywood Division serves approximately 165,000 persons and covers 13.34 sq. mi..

The DEIR says that 5,352 crimes were committed in the Hollywood area in 2015.

The DEIR says that 118,278 crimes were committed Citywide in 2015.

These numbers are lower than the the figures reported by the LAPD for 2015.

COMPSTAT totals show 5,534 committed in the Hollywood area in 2015, 182 higher than the number given by the DEIR.

COMPSTAT totals show 118,884 committed Citywide in 2015, 606 higher than the number given by the DEIR.

The DEIR calculates a 0.032 per capita crime rate in Hollywood.

The DEIR calculates a 0.031 per capita crime rate Citywide.

Calculations made using the actual COMPSTAT totals show a 0.033 per capita crime rate in Hollywood.

Calculations made using the actual COMPSTAT totals show a 0.031 per capita crime rate Citywide.

In spite of the discrepancies, this is by far the most accurate picture presented of the crime rate in any recent DEIR for a project in the Hollywood area.

TRANSPORTATION

The EIR says:

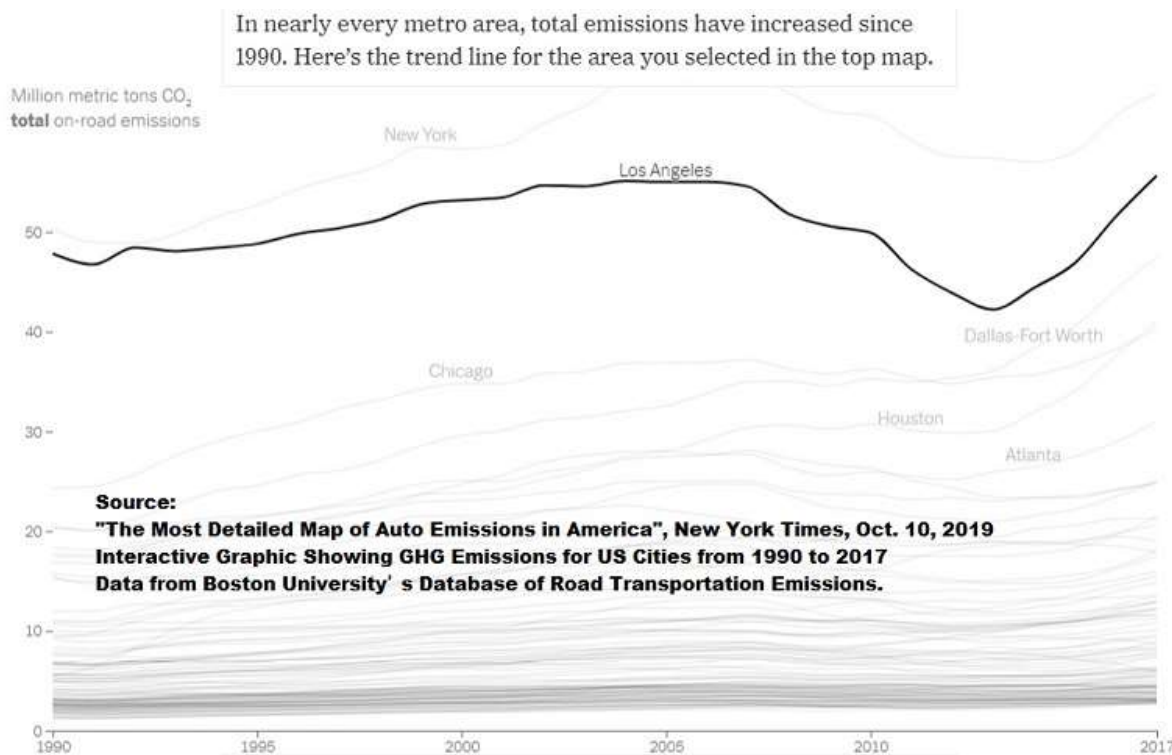
In accordance with Appendix G of the CEQA Guidelines and the City's CEQA Transportation Thresholds, a project would have a significant impact related to transportation if it would:

Threshold (a): Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Project is not consistent with SB 375 or with the SCAG RTP/SCS.

The California Legislature passed SB 375 with the intention of reducing GHGs. The City of Los Angeles has utterly failed to reduce transportation related GHG emissions as a result of its land use policies.

While transportations related GHG emissions declined in LA during the recession, they rose sharply between 2013 and 2017, as shown by the graph below.



See Attachment B, ["The Most Detailed Map of Auto Emissions in America", New York Times, October 10, 2019](#)

SB 375 states:

To the extent the sustainable communities strategy is unable to achieve the greenhouse gas emission reduction targets, the bill would require affected metropolitan planning organizations to prepare an alternative planning strategy to the sustainable communities strategy showing how the targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

Not only has the City of LA failed to reduce transportation related GHG emissions, it has failed to even monitor such emissions or to collect data from sources that do monitor emissions, such as Boston University's Database of Road Transportation Emissions.

The analysis of VMT generated by the Project is meaningless, since all projections are theoretical, with no supporting data. The VMT projections include factors such as proximity to retail, proximity to transit, and Transportation Demand Management Programs, but no data is presented to show that these factors have reduced VMT in similar projects.

The City of LA has failed to fulfill its promise of reducing VMT and increasing transit ridership

through Transit-Oriented Development, both citywide and in the Hollywood area. Over 2,000 new units have been built in Hollywood within over the past 15 years, including The Jefferson, The Rubix, The Avenue, Eastown and El Centro, all within a 5-minute walk of the Red Line and with access to numerous Metro and LADOT lines.

And yet Metro data shows that ridership on bus lines that serve the area has declined precipitously in recent years, including Lines 2/302, 212, 217, and 780.

Public Record Requests
METRO - LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY - LACMTA MAKE REQU

 19-154-RidershipDataReport.xls

DESCRIPTION
19-154 Ridership Data Report.






FOLDER
N/A

VISIBILITY
Requester

DOCUMENT DATE
N/A

UPLOAD DATE
02/04/19

View Search

Line	FY07_Boardings	FY12_Boardings	FY17_Boardings
2/302	7,974,718	6,150,352	4,656,239
212	4,565,724	4,472,032	3,922,628
217	4,188,555	2,894,930	2,189,235
780	3,217,998	2,614,822	2,143,239

LADOT does not publish ridership stats for individual DASH lines, and has not responded to three PRA requests for data on its lines.

But even though it is not possible to present data on the DASH lines that serve Hollywood, ridership on the DASH system as a whole has dropped drastically in recent years.

LADOT ANNUAL UNLINKED TRIPS FROM 2013 TO 2018

Data from Federal Transit Administration

LADOT Annual Agency Profiles

2013 26,619,776 Annual Unlinked Trips

2014 25,584,956 Annual Unlinked Trips

2015 23,895,017 Annual Unlinked Trips
2016 21,536,305 Annual Unlinked Trips
2017 19,734,177 Annual Unlinked Trips
2018 18,394,160 Annual Unlinked Trips

There has been a systemwide loss of 8,225,616 Annual Unlinked Trips from 2013 to 2018, a 30% decline.

See Attachment C, LADOT Stats from FTA 2013, and Attachment D, LADOT Stats from FTA 2018

GHG emissions in LA have risen rapidly since 2013.

The City has failed to monitor GHG emissions or to gather data from sources that monitor GHG emissions.

The City has does not gather or publish data on Vehicle Miles Travelled.

The City does not gather or publish data to show that its land use policies have had any impact on reducing VMT or GHGs.

The City has ignored published data from established research institutions that demonstrate the failure of its policies, i.e. "Falling Transit Ridership", UCLA Institute of Transportation Studies, January 2018. Here is an excerpt from the press release that accompanied the report's release:

Increased car ownership can likely explain much of the transit ridership decline in Southern California. Between 2000 and 2015, private vehicle ownership dramatically increased among households in the SCAG region, from 1.7 to 2.4 vehicles per household. During the 1990s, the region grew by 1.8 million people and 456,000 household vehicles, or 0.25 cars per new resident. But from 2000 to 2015, the region added 2.3 million people and 2.1 million household vehicles, nearly one car per new resident.

Car ownership has grown fastest among the most frequent transit riders. A small portion of Southern California residents take the majority of all transit trips: Less than 3 percent of the region's population rides transit very frequently, another 20 percent rides occasionally, and more than three-quarters of residents ride transit rarely or never. Frequent transit ridership is concentrated among lower-income people, particularly foreign-born residents. And these households have outpaced the average regional resident in new car ownership — the share of foreign-born households without a car dropped by 42 percent between 2000 and 2015.

Falling Transit Ridership, UCLA ITS, 2018

<https://www.its.ucla.edu/2018/01/31/new-report-its-scholars-on-the-cause-of-californias-falling-transit-ridership/>

The EIR's analysis of projected VMT from the project is entirely theoretical and presents no supporting data to show actual reductions achieved from similar projects.

In spite of all this, the City has made no effort to create an alternative planning strategy to reduce GHGs, as required by SB 375.

Therefore, the City of LA and this project fail to comply with SB 375 and the SCAG RTP/SCS.

SOLID WASTE

The DEIR says:

By the end of 2011, the City achieved a diversion rate of 76.4 percent. In 2011, the last reported year available, the City generated approximately nearly 16 million tons of potential solid waste. Of this total, the City diverted approximately 12.2 million tons (76.4 percent) from disposal into landfills.

The reason the most recent data offered by the City on diversion of solid waste to recycling comes from 2011 is that the City simply has failed to collect or publish data on recycling.

The implication that the City currently diverts 76.4% of solid waste to recycling is false.

The City of LA had been exporting much of its recyclable material to China over the last decade. But since decision by China in January 2018 to sharply restrict the import of recyclable materials, the City and the State have been plunged into a recycling crisis. California markets for recyclable materials have collapsed, and many recycling operations have closed.

The Project will be served by the RecycLA program.

The RecycLA program has revised its goals for diversion to recycling to 35% by 2023.

This means that the Project will not comply with AB 939, which requires municipalities to divert 50% of solid waste to recycling.

See Attachment E, "New RecycLA settlement: Relaxed hauler targets, \$9M in customer relief" from WasteDive, February 14, 2019

Here is an excerpt from the article:

Los Angeles still has a stated goal of 90% land'ill diversion by 2025, but the city has revised its RecycLA contract target from 45% to 35% diversion by 2023. A lack of recent data (another RecycLA priority) makes it hard to assess where that diversion rate currently stands. Regardless of this new financial compromise, it's clear significant progress will need to be made by all parties in order to hit the mark.

The City attempts to claim compliance by simply not collecting or publishing current data. The Project does not comply with AB 939, and therefore does not fulfill CEQA's requirement that it comply with existing law.

Hollywood Center DEIR

with a population of approximately 840,400 residents, and oversees operations in the communities of Hollywood, Wilshire, Pacific, and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.¹² The West Traffic Division is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau. The West Bureau oversees operations at five community police stations: the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, the Olympic Community Police Station and the West Los Angeles Community Police Station.¹³ The Hollywood Community Police Station, which is the nearest to the Project Site, serves the Project Site and is described in more detail below.

(2) LAPD Hollywood Community Police Station

The Project Site is served by the Hollywood Community Police Station,¹⁴ located at 1358 North Wilcox Avenue, approximately 0.70 miles southwest of both the West Site and East Site, as shown in **Figure IV.K.2-1, *Location of Hollywood Community Police Station***. The Hollywood Community Police Station's boundaries encompass 17.2 square miles (Hollywood Community Area) and includes the communities of Argyle, Cahuenga Pass, East Hollywood, Fairfax, Hobart, Hollywood, Hollywood Hills, Hollywood/La Brea, Little Armenia, Los Feliz, Melrose District, Mount Olympus, Sierra Vista, Spaulding Square, Sunset Strip, Thai Town, and Vine/Willoughby.¹⁵ The approximate borders of its service area are Mulholland Drive and the Griffith Park boundary to the north, the City of Los Angeles boundary and Melrose Avenue to the south, Normandie Avenue and the Griffith Park boundary to the east, and the City of Los Angeles boundary along a portion of Sycamore Avenue to the west.¹⁶ Based on the information provided by the LAPD, as of November 2018, the Hollywood Community Police Station includes 352 sworn officers and 32 civilian support staff, who serve a population of approximately 300,000 persons.¹⁷ Additionally, there are special service teams available within the LAPD to service the Hollywood Community Area.

¹² LAPD, About West Bureau, http://www.lapdonline.org/west_bureau/content_basic_view/1869, accessed September 25, 2019.

¹³ LAPD, West Bureau Community Police Stations, http://www.lapdonline.org/west_bureau/content_basic_view/1871, accessed March 6, 2020.

¹⁴ Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

¹⁵ LAPD, Hollywood Community Police Station, http://www.lapdonline.org/hollywood_community_police_station, accessed September 25, 2019.

¹⁶ Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

¹⁷ Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

Hollywood Center DEIR

multi-layer approach to police protection services through statistical and geographical information system analysis of trends in crime.

Table IV.K.2-1, Population, Officer, and Crime Comparison (2017), lists the resident population, number of sworn officers, officer/resident ratio, number of crimes, and crimes per 1,000 residents for the Hollywood Community Area and Citywide for year 2017, the latest data available. As reported therein, the officer to resident population ratios within the Hollywood Community Area and Citywide are 1:852 and 1:400, respectively, and the number of crimes per 1,000 residents within the Hollywood Community Area and Citywide is 15 and 32, respectively.

**TABLE IV.K.2-1
POPULATION, OFFICER, AND CRIME COMPARISON (2017)**

Service Area	Square Miles	Resident Population	Sworn Officers	Officers/Resident Ratio	Annual Reported Crimes	Crimes per 1,000 Residents
Hollywood Community Area	17.2 ^a	300,000 ^a	352 ^a	1/852 ^a	4,630 ^{a,b}	15 ^c
Citywide	472.9 ^d	4,007,905 ^d	10,029 ^d	1/400 ^e	129,587 ^d	32 ^f

^a Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

^b Crime data is provided for 2017 (the latest whole year for which annual crime data was available) in the LAPD Letter, provided as Appendix M-2 of this Draft EIR.

^c 4,630 crimes/300,000 residents = 0.015 X 1,000 = 15 crimes per 1,000 residents

^d LAPD, COMPSTAT Citywide Profile 12/04/17-12/31/17. This number differs compared to the previously listed 10,004 sworn officers as of March 2, 2020, as based on the latest COMPSTAT data.

^e 4,007,905 residents/10,029 officers = 400 residents/1 officer.

^f 129,587 crimes/4,007,905 residents = 0.032 X 1,000 = 32 crimes per 1,000 residents.

SOURCE: ESA, 2019.

As reported by the LAPD, as a whole, Citywide crime decreased steadily between 2003 and 2014.²⁰ This decrease was attributed to a number of factors, including the LAPD's decade long use of COMPSTAT, which enables the LAPD to track crime trends and appropriately deploy officers, and the LAPD's emphasis on crime prevention and intervention in addition to enforcement.²¹

In 2015, overall crime increased in all categories, with violent crime increasing Citywide by 20 percent and property crime increasing by 10 percent.²² According

²⁰ 89.3 KPCC Southern California Public Radio, Crime & Justice, LAPD: Crime in Los Angeles Down for the 11th Straight Year, January 13, 2014.

²¹ 89.3 KPCC Southern California Public Radio, Crime & Justice, LAPD: Crime in Los Angeles Down for the 11th Straight Year, January 13, 2014.

²² LAPD, LAPD Statement on Crime Fighting Strategies, News Release dated January 20, 2016.

Hollywood Center DEIR

located on the Project Site. The surface parking lots are lit by street lights and lamps located at the boundaries and center of the parking lots.

TABLE IV.K.2-2
HOLLYWOOD COMMUNITY AREA CRIME STATISTICS (2017)

Crime	Hollywood Community Area	
	Number	Percent of Hollywood Community Area Crime ^a
Homicide	2	0%
Rape	76	2%
Robbery	386	8%
Aggravated Assault	511	11%
Burglary	353	8%
Motor Vehicle Theft	442	9%
Burglary From Motor Vehicle	1,519	33%
Personal/Other Theft	1,341	29%
Total	4,630	100%

^a Percentages are rounded.

SOURCE: Michael R. Moore, Chief of Police; Darnell D. Davenport, Captain, Community Officer, Outreach and Development Division; Officer Christopher Gibson, Community Outreach and Development Division, dated October 9, 2018. Provided in Appendix M-2 of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

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

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

For this analysis, the Appendix G Thresholds are 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 questions. The factors to evaluate police services impacts include:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;

Hollywood Wilcox DEIR

(2) LAPD Community Police Station

Within the Hollywood service area, the Project Site is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.4 mile south of the Project Site.¹⁴ The location of the police station that serves the Project Site is depicted in Figure IV.H.2-1 on page IV.H.2-6. The Hollywood Community Police Station has a service area of approximately 17 square miles and is bounded by Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south.¹⁵ This station serves a population of approximately 300,000 persons and is staffed by approximately 352 sworn officers and 32 civilian support staff.^{16,17} The average response time for service in the Hollywood Service Area in 2016 was 3.2 minutes for emergency calls and 22.9 minutes for non-emergency calls. Based on the police service population of approximately 300,000 persons, the officer-to-resident ratio is approximately 1.2 officers per 1,000 residents. As such, the officer to resident ratio in the Hollywood Area is lower than the Citywide ratio of 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.H.2-1 on page IV.H.2-7 shows a comparison of the Hollywood Service Area and Citywide data regarding crimes as reported by the LAPD based on only residential populations. As shown therein, based on the most recent data available from Compstat for the year 2019, 6,223 crimes were reported within the Hollywood Service Area¹⁸ and 120,828 crimes were reported citywide.¹⁹ Based on the residential service population of the Hollywood Community Police Station, approximately 20.74 crimes per 1,000 residents²⁰

¹⁴ LAPD, *Hollywood Community Police Station*, www.lapdonline.org/hollywood_community_police_station, accessed January 9, 2020.

¹⁵ LAPD, *About Hollywood*, www.lapdonline.org/hollywood_most_wanted/content_basic_view/1665, accessed January 9, 2020.

¹⁶ LAPD, *About Hollywood*, www.lapdonline.org/hollywood_most_wanted/content_basic_view/1665, accessed January 9, 2020.

¹⁷ *Written correspondence from Christopher Gibson, Community Relationship Division, Los Angeles Police Department, October 5, 2017. See Appendix K of this Draft EIR.*

¹⁸ LAPD, *COMPSTAT Unit, COMPSTAT Hollywood Area Profile 12/01/19 to 12/28/19*, accessed January 9, 2020.

¹⁹ LAPD, *COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19 to 12/28/19*, accessed January 7, 2020.

²⁰ $6,223 \text{ crimes} / 300,000 \text{ residents} = 20.74 \text{ crimes per } 1,000 \text{ residents.}$

Table IV.H.2-1
2019 Crimes—Hollywood Service Area and Citywide

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Hollywood Service Area	6,223	300,000	20.74/1,000	0.0207
Citywide	120,828	4,029,741	29.98/1,000	0.0300

Source: LAPD, COMPSTAT Unit, COMPSTAT Hollywood Area Profile 12/01/19 to 12/28/19, accessed January 9, 2020; LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 12/01/19 to 12/28/19, accessed January 7, 2020.

(0.0207 crime per capita²¹) were reported in the Hollywood Service Area and 29.98 crimes per 1,000 residents²² (0.0300 crime per capita²³) were experienced citywide.

Based on the number of sworn officers staffing the Hollywood Community Police Station (352 sworn officers), the 2019 ratio of crimes per officer is 17.7 crimes per officer²⁴ in comparison to a 2019 citywide ratio of 12.0 crimes per officer (10,033 sworn officers citywide).²⁵ Thus, the Hollywood Service Area has a higher crime per officer ratio compared to the City as a whole.

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

²¹ 300,000 residents/6,223 crimes = 0.0207 crimes per capita.

²² 120,828 crimes/4,029,741 residents = 29.98 crimes per 1,000 residents.

²³ 4,029,741 residents/120,828 crimes = 0.030 crimes per capita.

²⁴ 6,223 crimes/352 sworn officers = 17.7 crimes per officer.

²⁵ 120,828 crimes/10,033 sworn officers = 12.0 crimes per officer.

Hlwd Ctr EIR UN4LA Comments FINAL W ATTACHMENT.pdf

estimated to generate a net of 65 new employees on-site. As such, the Project's estimated 65 new employees would constitute approximately 0.06 percent of the Subregion's employment growth forecasted between 2016 and 2022. It is anticipated that some of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, given that the Project would not directly contribute to population growth in the Project area and as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Furthermore, as the Project would be located in a developed area with an established network of roads and other urban infrastructure, it would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

As no housing currently exists on the Project Site, the development of the Project would not displace any existing housing or cause the displacement of any persons or require the construction of housing elsewhere.

Therefore, the Initial Study concluded that impacts related to population and housing would be less than significant.

m. Public Services

(1) Police Protection

With regard to construction, construction sites can be sources of nuisances and hazards and invite theft and vandalism. Therefore, in accordance with standard construction industry practices, the potential for theft of construction equipment and building materials would be minimized through the use of security fencing, lighting, locked entry, and security patrol of the Project Site and construction areas.

Construction of the Project could also potentially impact the provision of Los Angeles Police Department (LAPD) police protection services and emergency access in the vicinity of the Project Site as a result of construction impacts on the surrounding roadways. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of demolition and graded materials, and construction worker trips. However, during construction of the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available at the Project Site during construction activities. In addition, designated truck queuing, equipment staging, and construction worker parking areas would be provided. In accordance with City requirements, emergency access to the Project Site would remain clear and unhindered during construction of the Project. Also, given the permitted hours of construction and nature of construction projects, most of the

construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. Further, pursuant to Section 21806 of the California Vehicle Code, the drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, no construction-related impacts regarding the provision of police protection services or emergency access are anticipated to occur.

The Project would not include the development of new residential units that would increase the residential population in the service area of the Hollywood Community Police Station and generate additional demand for police services. However, the Project's proposed 240 hotel guest rooms would increase the hotel guest population within the Hollywood Community Police Station service area and generate a maximum of 360 persons on the Project Site.^{8, 9} In addition, the Project would generate up to approximately 83 employees, which would also increase the daytime population within the Hollywood Community Police Station service area. However, since the Project does not include any residential uses, the Project would not directly affect the existing officer-to-resident ratio or the crimes per resident ratio citywide or within the Hollywood Community Police Station service area. Nonetheless, to help reduce any on-site increase in demand for police services, the Project would implement comprehensive safety and security features to enhance public safety and reduce the demand for police services, including: 24-hour on-site security personnel to monitor entrances and exits, manage and monitor the fire/life/safety systems, patrol the perimeter of the property, and control and monitor activities in the public spaces and private guest amenity areas; closed-circuit security camera system; keycard entry for hotel guests; and lighting around building entries, walkways, parking areas elevators, and lobbies to maximize visibility.

During operation, emergency vehicles would continue to have access to the Project Site from Vine Street. In addition, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code requirements regarding site access, including providing adequate emergency vehicle access. The Project does not include any improvements along the streets surrounding the Project Site that could impede emergency vehicle access. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. Therefore, the Project's operation would not significantly impact emergency vehicle access to the Project

⁸ Based on the conversion factor of 1.5 persons/room/day for hotel uses provided in the L.A. CEQA Thresholds Guide.

⁹ The Initial Study analyzed a Project with 216 hotel rooms and a maximum of 324 persons on-site. The addition of 24 rooms and 36 persons does not change the impact conclusion since the Project does not include residential uses and would not affect the officer-to-resident or the crimes per resident ratios.

Site and surrounding uses, and the Project is not anticipated to impair the LAPD from responding to emergencies at the Project Site or the surrounding area.

Based on the above analysis, the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the Hollywood Community Police Station to serve the Project Site. Therefore, the Project would not necessitate the provision of new or physically altered police stations, the construction of which could cause significant impacts, in order to maintain acceptable service ratios or response times.

(2) Schools

The Project does not propose the development of new residential dwelling units at the Project Site. Therefore, implementation of the Project would not result in a direct increase in the number of students within the service area of the LAUSD. In addition, the number of students that may be indirectly generated by the Project that could attend LAUSD schools serving the Project Site would not be anticipated to be substantial because not all employees of the Project are likely to reside in the vicinity of the Project Site. Furthermore, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered full mitigation of Project-related school impacts. Thus, the Project would not result in the need for new or altered school facilities.

(3) Parks

The Project does not propose the development of residential uses. Therefore, implementation of the Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. While it is possible that some of the new employees that could be generated by the Project may utilize local parks and recreational facilities during work breaks, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited. Additionally, although there is the possibility that hotel guests may also utilize local parks and recreational facilities, the demand is also expected to be negligible since hotel guests would likely utilize the recreational amenities provided within the hotel. Therefore, the Project's impact on parks and recreational facilities would be less than significant.

As of December 2018, the departmental staffing resources within the LAPD included 10,015 sworn officers. Based on a total City population of 4,007,147, the LAPD currently has an officer-to-resident ratio of approximately 2.5 officers for every 1,000 residents.¹²

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.¹³ The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, and West Los Angeles service areas.¹⁴ The West Bureau also oversees the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile.¹⁵

(2) LAPD Community Police Station

Within the West Bureau, the Project Site is located within the Hollywood Area and is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.6 mile southwest of the Project Site.¹⁶ The location of the police station that serves the Project Site is depicted in Figure IV.F.2-1 on page IV.F.2-6. The Hollywood Community Police Station has a service area of approximately 17.2 square miles and is bounded by Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north, and Beverly Boulevard on the south.¹⁷ This station serves a population of approximately 300,000 persons and is staffed by approximately 352 sworn officers and 32 civilian support staff.¹⁸ The average response time for service in the Hollywood Area in 2016 was 3.2 minutes for emergency calls and 24.3 minutes for non-emergency calls.¹⁹

¹² LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 11/11/18 to 12/08/18, <http://assets.lapdonline.org/assets/pdf/cityprof.pdf>, accessed December 27, 2018.

¹³ LAPD, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed December 27, 2018.

¹⁴ LAPD, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed December 27, 2018.

¹⁵ LAPD, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed December 27, 2018.

¹⁶ LAPD, About Hollywood, www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed December 27, 2018.

¹⁷ LAPD, About Hollywood, www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed December 27, 2018.

¹⁸ Written correspondence from Al Neal, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, November 29, 2017. See Appendix G of this Draft EIR.

¹⁹ Written correspondence from Al Neal, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, November 29, 2017. See Appendix G of this Draft EIR.

Based on the police service population of approximately 300,000 persons, the officer-to-resident ratio is approximately 1.2 officers per 1,000 residents. As such, the officer to resident ratio in the Hollywood Area is lower than the Citywide ratio of approximately 2.5 officers per 1,000 residents.

(3) LAPD Crime Statistics

Table IV.F.2-1 below shows a comparison of the Hollywood Area and Citywide data regarding Part I crimes.²⁰ As shown therein, based on data available from 2018, approximately 5,593 crimes were reported within the Hollywood Area and 119,214 crimes were reported citywide. Based on the service population of the Hollywood Community Police Station, approximately 19.5 crimes per 1,000 residents (0.0195 crime per capita) were reported in the Hollywood Area and approximately 29.8 crimes per 1,000 residents (0.0298 crime per capita) were experienced citywide.

Based on the number of sworn officers staffing the Hollywood Community Police Station (352 sworn officers), the 2018 ratio of crimes per officer was 16.6 crimes per officer in comparison to a 2018 citywide ratio of 11.9 crimes per officer (10,015 sworn officers citywide). Thus, the Hollywood Area has a higher crime per officer ratio compared to the citywide ratio.

**Table IV.F.2-1
2018 Part I Crimes—Hollywood Area and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes per Capita
Hollywood Area	5,838	300,000	19.5	0.0195
Citywide	119,214	4,007,147	29.8	0.0298

Source: LAPD, COMPSTAT Unit, COMPSTAT Hollywood Area Profile 11/04/18 to 12/01/18; COMPSTAT Unit, COMPSTAT Citywide Profile 11/11/18 to 12/08/18.

²⁰ Part I crimes include criminal homicide, forcible rape/legacy rape, revised rape, robbery, aggravated assault, burglary (breaking or entering), larceny-theft, motor vehicle theft, and arson, based on U.S. Department of Justice Federal Bureau of Investigation, Uniform Crime Reporting (UCR) Offense Definitions, www.ucrdatatool.gov/offenses.cfm, accessed December 27, 2018.

Hlwd Ctr EIR UN4LA Comments FINAL W ATTACHMENT.pdf

HCPU Update DEIR

activity.¹⁵ Existing site security practices include the use of paths, lighting, entryways, and security features (locks/gates/signs) to enhance site safety.¹⁶

EXISTING SETTING

The LAPD provides police protection services in the City, including the Project Area. The LAPD also contains specialized units, including Special Operations, Special Weapons and Tactics (SWAT), Gangs and Narcotics, K-9 Units, and Mounted Units. The LAPD is divided into four geographic bureaus: Central, South, West, and Valley Bureaus, which are divided into 21 community police divisions, and into reporting districts. The Project Area is located within several LAPD bureaus, including the Central, Valley, and West Bureaus. LAPD divisions within these geographic bureaus that serve the Project Area are shown in **Figure 4.14-2**. As of September 2016, the LAPD has a total of 9,811 sworn officers.

The Central Bureau encompasses a 65-square mile service area with a population of approximately 900,000 residents. The Central Bureau service boundaries include the Los Angeles City limits on the north and east, Florence Avenue to the south, and Griffith Park Boundary/Western Avenue to the west. The Central Bureau oversees operations in the following area divisions: Central, Hollenbeck, Newton, Northeast, and Rampart, as well as the Central Traffic Division. Communities served by the Central Bureau include the downtown business district, Eagle Rock, Garment District, MacArthur Park, Dodger Stadium and Griffith Park. The eastern portion of the Project Area is located within the Central Bureau jurisdiction.

The Valley Bureau encompasses approximately 226.5-square miles serving a population of approximately 1.4 million residents. The Valley Bureau oversees operations in the following areas: Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley, as well as Valley Traffic Division. The northern portion of the Project Area abutting North Hollywood is located within the Valley Bureau jurisdiction.

The West Bureau comprises a 124-square mile service area with a population of approximately 840,000 residents. The West Bureau geographical boundaries are bounded by Forest Lawn Drive to the north, Normandie Boulevard to the east, El Segundo Boulevard to the south, and the Pacific Ocean to the west. The West Bureau includes the following LAPD Divisions: Hollywood, Wilshire, Pacific and West Los Angeles, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The western portion of the Project Area is located within the West Bureau jurisdiction.

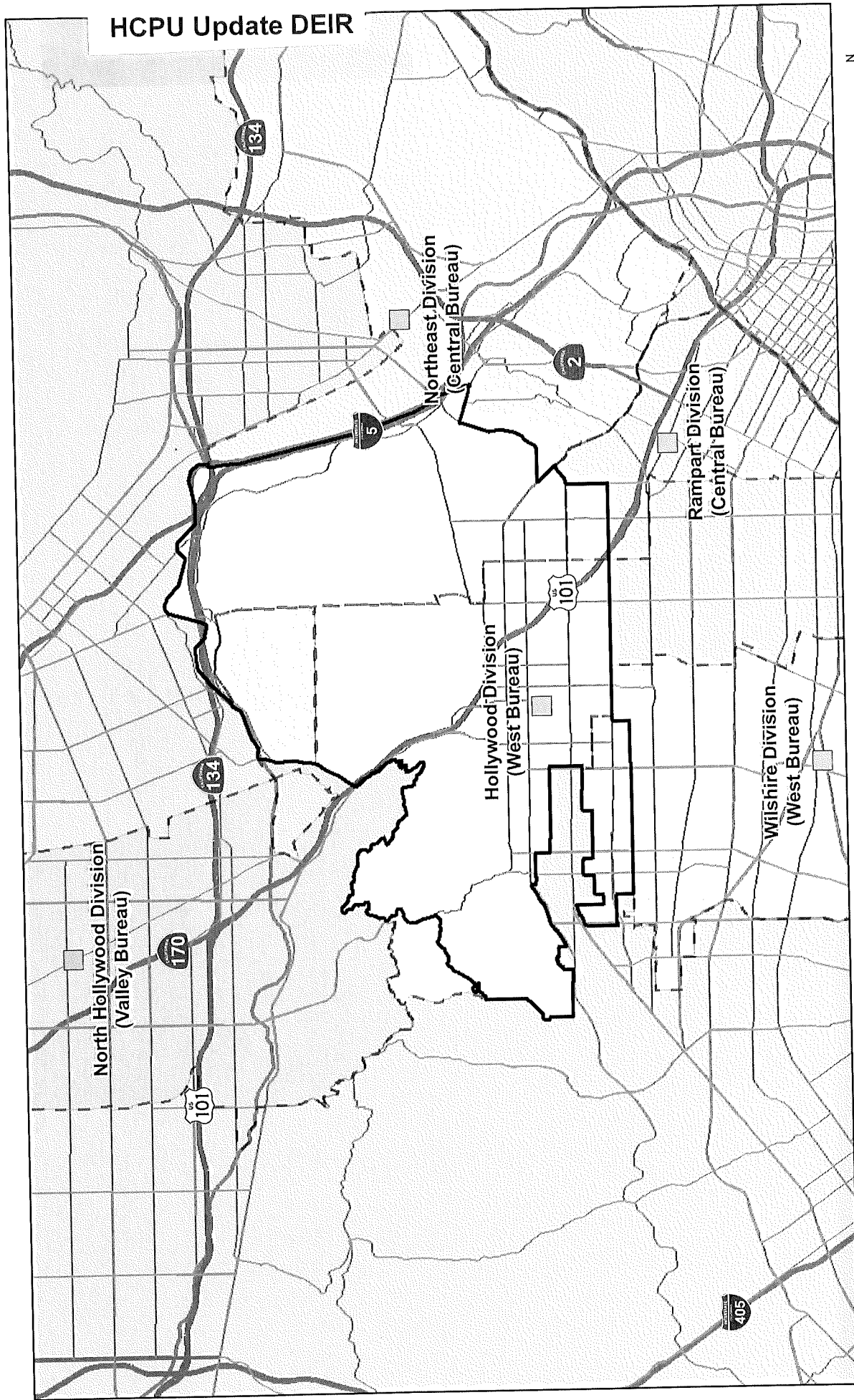
The Project Area would be served by several community police stations, including the Northeast, Rampart, North Hollywood, Hollywood, Olympic and Wilshire Community Police Stations. The Project Area is predominantly located within the Hollywood Community Police Station service area. **Table 4.14-7** provides details of each police station serving the Project Area and is further discussed below.

¹⁵City of Los Angeles, *Design Out Crime Guidelines: Crime Prevention through Environmental Design*, https://planning.lacity.org/policyinitiatives/CPTED/CPTED_Guidelines.pdf, accessed November 7, 2017.



¹⁶LAPD, *Design Out Crime*, http://www.lapdonline.org/crime_prevention/content_basic_view/8852#1, accessed September 14, 2016.

HCPU Update DEIR

ATTACHMENT A



LEGEND:

-  Hollywood CPA
-  LAPD Stations

SOURCE: City of Los Angeles, 2017; TAHA, 2017.

Hollywood Community Plan Update
 Draft Environmental Impact Report



CITY OF LOS ANGELES

FIGURE 4.14-2

POLICE STATIONS

HCPU Update DEIR

TABLE 4.14-7: LAPD POLICE STATIONS SERVING THE PROJECT AREA

Bureau	LAPD Community Station	No. of Officers	Service Area (sq. mi)	Population Served
Central	Northeast Division 3353 San Fernando Rd., Los Angeles, CA 90065	150 sworn and civilian (Central Traffic division)	29	250,000
Central	Rampart Division 1401 W. 6 th St., Los Angeles, CA 90017	330 sworn and civilian	5.54	164,961
Valley	North Hollywood Division 11640 Burbank Blvd., North Hollywood, CA 91601	300 sworn officers 31 civilian staff 32 reserves 28 citizen volunteers	25	220,000
West	Hollywood Division 1358 N. Wilcox Ave., Los Angeles, CA 90028	365 sworn officers 17 civilian staff	17.2	300,000
West	Olympic Division 1130 S. Vermont Ave., Los Angeles, CA 90006	247 Sworn officers 17 civilian staff	6.2	186,615
West	Wilshire Division 4861 W. Venice Blvd., Los Angeles, CA 90019	337 sworn officers 30 civilian staff	13.97	251,000

SOURCE: LAPD, www.lapd.org; TAHA, 2017.

The Northeast Community Police Station, located within the Central Bureau, encompasses a 29-square mile service area with a population of approximately 250,000 residents. Its service boundaries extend to the Los Angeles City boundaries on the north and east, I-110 to the southeast, Sunset Boulevard to the southeast, and the Griffith Park Boundary/Western Avenue to the west. The Northeast Community Police Station is located at 3353 San Fernando Road and serves the communities of Atwater Village, Cypress Park, Eagle Rock, East Hollywood, Echo Park, Elysian Park, Elysian Valley, Franklin Hills, Garvanza, Glassell Park, Highland Park, Los Feliz, Mount Washington, Silver Lake, and Solano Canyon. Approximately 150 sworn police officers and civilian support staff serve the Northeast Community Police Station service area.

The Rampart Community Police Station, located within the Central Bureau, encompasses a 5.5-square mile service area with a population of approximately 164,961 residents. Its service boundaries extend to Sunset Boulevard to the north, the I-110, I-10 to the south, and Hoover Street and Normandie Avenue to the west. The Rampart Community Police Station is located at 1401 West 6th Street and serves the communities of Angelino Heights, Echo Park, Historic Filipinotown, Koreatown, Lafayette Park, Macarthur Park, Pico-Union, Temple-Beaudry, Virgil Village, and Westlake. Approximately 330 sworn police officers and civilian support staff serve the Rampart Community Police Station service area.

The North Hollywood Community Police Station, located within the Valley Bureau, encompasses a 25-square mile service area with a population of approximately 220,000 residents. The North Hollywood Community Police Station is located at 11640 Burbank Boulevard and serves the community areas of North Hollywood, Studio City, Valley Glen, Valley Village, Toluca Lake, West Toluca Lake, Toluca Woods, Universal City, Cahuenga Pass, and a portion of Sun Valley. Approximately 330 sworn police officers, 31 civilian support staff, in addition to 32 reserve officers and 28 citizen volunteers serve the North Hollywood Community Police Station service area.

The Hollywood Community Police Station, located within the West Bureau, encompasses a 17.2-square mile service area with a population of approximately 300,000 residents. Its service boundaries are Normandie Avenue on the east, City of West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south. The Hollywood Community Police Station is located at 1358 Wilcox

HCPU Update DEIR

Avenue and serves the communities of Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue and Los Feliz Estates. Approximately 365 sworn police officers and 17 civilian support staff serve the Hollywood Community Police Station service area.

The Olympic Community Police Station, located within the West Bureau, encompasses a 6.2-square mile service area with a population of approximately 186,615 residents. Its service boundaries are Melrose Avenue to the north; Hoover Street to the east; I-10 to the south; and Gower Street, Plymouth Boulevard, and Crenshaw Boulevard to the west. The Olympic Community Police Station is located at 1130 S. Vermont Avenue and serves the communities of the Mid-City region, including Koreatown and Miracle Mile. Approximately 247 sworn officers and 17 civilian support staff serve the Olympic Community Police Station service area.

The Wilshire Community Police Station, located within the West Bureau, encompasses a 13.97 square mile service with a population of 251,000 residents, which can increase to a population of approximately 500,000 people as a result of the business district and educational and professional institutes. The cities of Beverly Hills and West Hollywood and the Police Stations at Hollywood, Rampart, Southwest and West Los Angeles border Wilshire's boundaries. The Wilshire Community Police Station is located at 4861 Venice Boulevard and services the communities of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Park, Larchmont Village, Little Ethiopia, Melrose, Mid-City, Mid-Wilshire, Miracle Mile, Park La Brea, South Carthay, Wellington Square, Wilshire Center, Wilshire Vista, and Windsor Square. Approximately 337 sworn officers and 30 civilian support staff serve the Wilshire Community Police Station service area.

Crime statistics for the year 2016 at the Citywide level and LAPD Community Police station service areas that would serve the Project Area are provided in **Table 4.14-8**. Crimes categorized as Part I crimes are eight "serious offenses" for which the FBI gathers national data and include homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft. Part II Crimes are "less serious" offenses and include simple assaults, forgery/counterfeiting, embezzlement/fraud, receiving stolen property, weapon violations, prostitution, sex crimes, crimes against family/child, narcotic drug laws, liquor laws, drunkenness, disturbing the peace, disorderly conduct, gambling, dui and moving traffic violations. As shown in **Table 4.14-8**, approximately 125,430 Part I Crimes were committed and approximately 119,955 violent and Part I Crime arrests were made Citywide for the year 2016. Of the LAPD Divisions serving the Project Area, the fewest crimes committed and reported occurred within the Rampart Division with approximately 4,931 Part I Crimes, and the most crimes committed and reported occurred within the North Hollywood Division with approximately 6,747 crimes. Respectively, the Wilshire Division had the least violent and Part I Crime arrests made with 2,723 arrests, compared to 9,994 arrests made in the Hollywood Division.

The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD. As such, for a conservative analysis, the crime rate in a given area is anticipated to increase as the level of activity and/or population and therefore the opportunities for crime increase. However, due to external factors that contribute to crime rates, such as police presence, crime prevention measures, and ongoing legislation/funding, the potential for increased crime rates may not be directly proportional to the increase in population or land use activity.

Response time is the amount of time between the time an emergency call is made and the time a police unit arrives at the scene. Calls for police assistance are prioritized based on the nature of the call. Police units are often in a mobile state; thus, the number of officers on the street is more directly related to the realized response time than the distance between a police station and a project site. The LAPD has an existing preferred response time of seven minutes for emergency calls.

HCPU Update DEIR

**TABLE 4.14-8: CRIME STATISTICS FOR LAPD STATIONS SERVING THE PROJECT AREAS
(YEAR 2016) /a/**

Crimes / Arrests	Citywide	Northeast	Rampart	North Hollywood	Hollywood	Olympic	Wilshire
PART I /b/							
Homicide	294	10	22	12	7	8	5
Rape	1,781	69	106	74	130	62	72
Robbery	10,253	306	637	289	552	610	347
Aggravated Assault	15,746	567	801	547	579	672	427
Violent Crime Total	28,084	952	1,566	922	1,268	1,352	851
Burglary	15,493	781	416	866	573	645	878
Motor Vehicle Theft	18,678	1,074	640	958	643	752	573
Burglary Theft from Vehicle	31,066	1,818	1,211	2,224	1,549	1,714	1,254
Personal/Other Theft	32,109	1,420	1,098	1,777	1,797	1,319	1,620
Property Crime Total	97,346	5,093	3,365	5,825	4,562	4,430	4,325
Part I Crime Total	125,430	6,045	4,931	6,747	5,830	5,782	5,176
ARRESTS							
Homicide	342	10	11	11	7	12	3
Rape	360	7	29	11	23	8	14
Robbery	2,836	75	175	66	152	127	108
Aggravated Assault	10,064	345	556	405	495	497	307
Burglary	2,270	108	84	101	110	127	61
Larceny	7,183	327	216	467	311	138	346
Motor Vehicle Theft	3,319	156	145	159	156	138	73
Violent Arrest Total	13,602	437	771	493	677	644	432
Part I Crime Arrest Total	26,374	1,028	1,216	1,220	1,254	1,047	912
All Arrest Total	119,955	3,836	5,465	5,219	9,994	4,414	2,723
/a/ Year 2016 crime statistics are the most up to date provided by the LAPD and are subject to change yearly.							
/b/ Part I crimes are eight "serious offenses" for which the FBI gathers national data and includes homicide, rape, robbery, aggravated assault, burglary, motor vehicle theft, burglary theft from vehicle, and personal/other theft.							
SOURCE: LAPD, <i>Compstat Citywide Profile, Community Area Profile</i> , www.lapd.org; TAHA, 2017.							

To plan for personnel needs at individual stations, the LAPD uses "Patrol Plan," a field deployment software which takes into account 25 separate factors, including crime data, population density, and traffic speeds, to respond to the need of increased demand associated with new development and/or population growth. The LAPD considers increases in staffing at stations in order to maintain a maximum response time of seven minutes.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the Proposed Plan would have a significant impact related to police protection services if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered police protection service facilities, the construction of which could cause significant environmental impacts for police protection in order to maintain acceptable service ratios, response times or other performance objectives.

IC Hollywood Gower DEIR

- 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

The LAPD is divided into four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the bureaus encompasses several community police stations.

(1) Existing Police Stations

The Project Site is located within the LAPD West Bureau. The Project would be served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue, approximately 0.90 mile southwest of the Project Site, and in Reporting District (RD) 647 within the Hollywood area.¹⁴ Figure IV.K-2 (Police Station Location Map), shows the location of the Hollywood Community Police Station in relation to the Project Site. The Hollywood Community Police Station covers 13.34 square miles. For the purposes of the LAPD, the Hollywood Community boundaries are defined as: Mulholland Drive and Griffith Park boundary to the north, Los Angeles City boundary, Fountain Avenue, Willoughby Avenue, and Melrose Avenue to the south, Los Angeles City boundary and the City of West Hollywood to west, and Normandie Avenue and Griffith Park boundary to the east. The boundaries for RD 647 are: Hollywood Boulevard to the north, Sunset Boulevard to the south, Vine Street to the west, and the Hollywood Freeway (I-110) to the east. The station currently has 352 sworn officers and 32 civilian staff representing an

¹⁴ Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated January 12, 2017.

Hlwd Ctr EIR UN4LA Comments FINAL W ATTACHMENT.pdf

officer-to-population ratio of one officer per approximately 468 residents. Additionally, there are special service teams available within the LAPD to service the Hollywood Area.¹⁵ No official standard has been set by the City with respect to officer to population ratio.

(2) LAPD Crime Stats

Table IV.K.2-1 provides a comparison of the Hollywood Community Police Station service area and citywide data regarding crimes as reported by the LAPD based on only residential populations. As shown therein, based on the most recent data made available by the LAPD Community Relationship Division and COMPSTAT for the year 2016, approximately 4,450 crimes were reported within the Hollywood Community Police Station service area and 107,570 crimes were reported citywide. Based on the residential service population of the Hollywood Community Police Station, approximately 2.7 crimes per 1,000 residents (0.027 crime per capita) were reported in the Hollywood Community Police Station service area and 27 crimes per 1,000 residents (0.027 crime per capita) were experienced citywide.

Based on the number of sworn officers staffing the Hollywood Community Police Station (352 sworn officers), the 2016 ratio of crimes per officer was 12.6 crimes per officer. In comparison, the citywide (9,845 sworn officers) ratio is 10.9 crimes per officer. As a result, the Hollywood Area has a higher crime per officer ratio when compared to the citywide ratio.

**Table IV.K.2-1
2016 YTD Crimes – Hollywood Area and Citywide**

	Crimes	Population	Crimes per 1,000 Persons	Crimes Per Capita
Hollywood Area	4,450	165,000	2.7	0.027
Citywide ^a	107,570	3,962,726	27	0.27

*a LAPD, COMPSTAT Unit, COMPSTAT Citywide Profile 10/16/16-11/12/16.
Source: Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated January 12, 2017.*

(3) LAPD Review

The LAPD recommends that developers of large-scale projects contact them for advice with regard to crime prevention features that may be incorporated into the project design. With incorporation of the Project Design Features described below, the Project would comply with LAPD’s “Design Out Crime” program that encourages project design that incorporates strategies from Crime Prevention Through Environmental Design (CPTED).

¹⁵ *Ibid.*

The Project Site is located in the West Bureau service area, which covers a territory of approximately 124 square miles with a population of approximately 840,400 residents. The West Bureau oversees operations in the Hollywood, Wilshire, Pacific, Olympic, and West Los Angeles service areas, as well as the West Traffic Division, which includes the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and Miracle Mile. The West Bureau is bordered to the north by Forest Lawn Drive, to the east by Normandie Avenue, to the south by El Segundo Boulevard, and to the west by the Pacific Ocean.⁸

(b) *LAPD Community Police Stations*

As described above, there are 21 services areas served by 21 community police stations within LAPD's jurisdiction. The Project Site is located within the service area of the Hollywood Community Police Station, which covers a service area of approximately 13.34 square miles. The Hollywood Community Police Station is located at 1358 Wilcox Avenue, approximately 0.3 mile southeast of the Project Site, as shown in Figure IV.K.1-1 on page IV.K.1-6. The service area of the Hollywood Community Police Station is generally bounded by Mulholland Drive and Griffith Park to the north, the Los Angeles City limits and Melrose Avenue to the south, Normandie Avenue and Griffith Park to the east, and the Los Angeles City limits to the west. According to the LAPD, approximately 352 sworn officers and 32 civilian support staff are deployed within the Hollywood Community Police Station service area.⁹ Based on a population of approximately 165,000 persons within the LAPD's Hollywood Community Police Station service area, the officer-to-resident ratio is approximately 2.13 officers per 1,000 residents. Thus, the officer-to-resident ratio is lower than the Citywide ratio of 2.61 officers per 1,000 residents.

Table IV.K.1-1 on page IV.K.1-7 shows a comparison of the Hollywood Community Police Station service area and Citywide data regarding crimes. As shown therein, in 2015, approximately 5,352 crimes were reported within the Hollywood Community Police Station service area and 118,278 crimes were reported Citywide. Based on the 2015 service population, approximately 32 crimes per 1,000 residents (0.032 crime per capita) were reported in the Hollywood Community Police Station service area and 31 crimes per 1,000 residents (0.031 crime per capita) were experienced Citywide.

⁸ *City of Los Angeles Police Department, About West Bureau, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed November 22, 2016.*

⁹ *Written correspondence from Ruby Flores, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, February 3, 2017. See Appendix K of this Draft EIR.*

**Table IV.K.1-1
2015 Crimes per 1,000 Persons within Hollywood Community and Citywide**

	Crimes	Population	Crimes per 1,000 Persons
Hollywood Service Area	5,352	165,000	32
Citywide	118,278	3,792,621	31

Source: Written correspondence from Ruby Flores, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, February 3, 2017. See Appendix K of this Draft EIR.

As shown Table IV.K.1-1, the Hollywood Community Police Station service area reported 5,352 crimes, and 118,278 crimes were reported Citywide. Based on the number of officers deployed within the Hollywood Community Police Station service area (352 sworn officers), the ratio of crimes per officer in 2015 was 15 crimes per officer in comparison to a Citywide ratio of 12 crimes per officer. Thus, the Hollywood Community Police Station service area experienced a higher crime per officer ratio compared to the Citywide ratio. Although the Hollywood Community Police Station service area had more crimes per officer when compared with the Citywide ratio, the average response time to emergency calls for service in the Hollywood Community Police Station service area during 2015 was 3.2 minutes as compared with the Citywide average response time of 4.0 minutes.¹⁰

3. Project Impacts

a. Methodology

According to the *L.A. CEQA Thresholds Guide*, police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in these factors resulting from a project may affect the demand for services. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing police services for the police station(s) serving the Project Site, including the availability of police personnel to serve the estimated Project population and whether adverse physical impacts would occur due to new or physically altered facilities. The analysis presents statistical averages associated with the police station serving the Project Site and Citywide services. The

¹⁰ *Written correspondence from Ruby Flores, Captain, Commanding Officer, Community Relationship Division, Los Angeles Police Department, February 3, 2017. See Appendix K of this Draft EIR.*



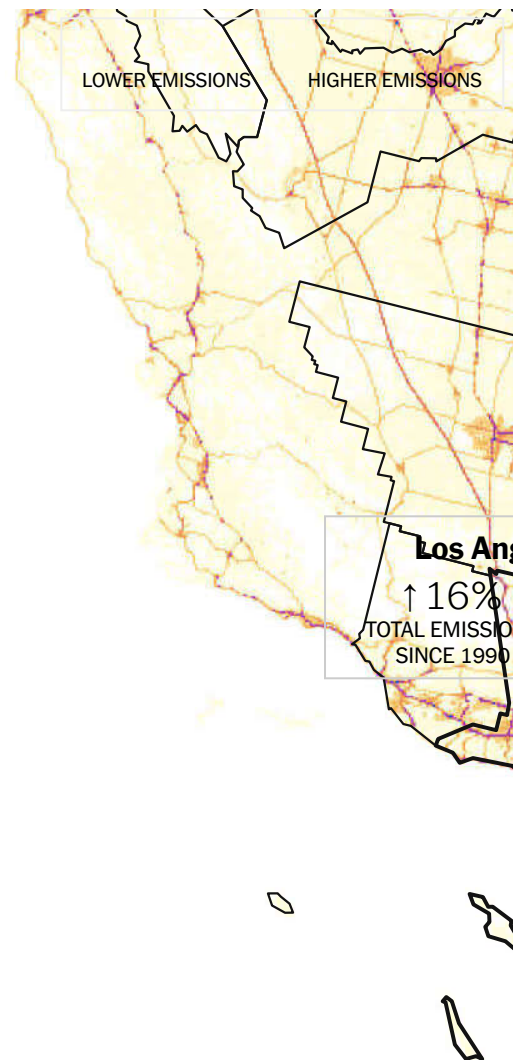
The Most Detailed Map of Auto Emissions in America

By Nadja Popovich and Denise Lu Oct. 10, 2019

Transportation is the largest source of planet-warming greenhouse gases in the United States today and the bulk of those emissions come from driving in our cities and suburbs.

The map below shows a year's worth of CO₂ from passenger and freight traffic on every road in the **Los Angeles metro area**

our best guess for your location.



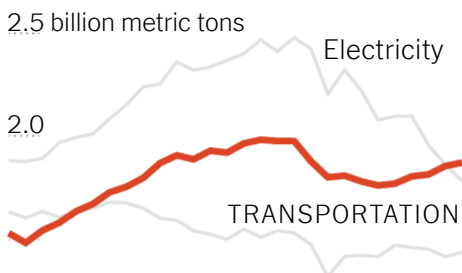
Emissions from driving in the **Los Angeles metro area** grew more slowly than population between 1990 and 2017, which means **emissions per person have decreased**.

These findings come from a New York Times analysis of new data released through Boston University’s Database of Road Transportation Emissions. The database provides the most detailed estimates available of local on-road CO₂ over the past three decades. The map above shows emissions in 2017.

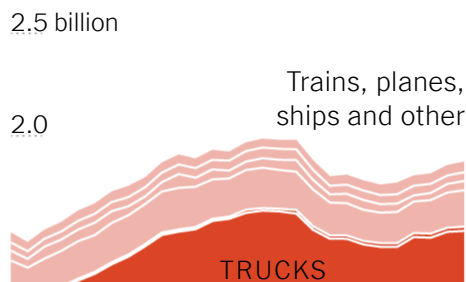
Even as the United States has reduced carbon dioxide emissions from its electric grid, largely by switching from coal power to less-polluting natural gas, emissions from transportation have remained stubbornly high.

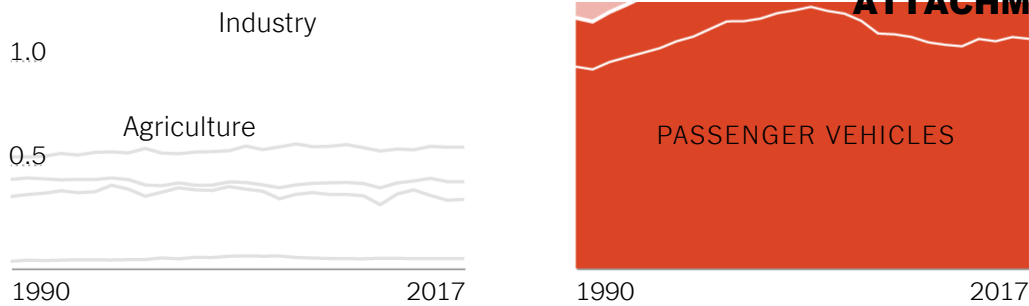
The bulk of those emissions, nearly 60 percent, come from the country’s 250 million passenger cars, S.U.V.s and pickup trucks, according to the Environmental Protection Agency. Freight trucks contribute an additional 23 percent.

In 2017, **transportation** was the top source of greenhouse gases.



The vast majority of those emissions came from **driving**.





Charts show the carbon dioxide equivalent of greenhouse gas emissions. ▪
Source: Environmental Protection Agency

Reducing emissions from driving has been a big challenge, said Conor Gately, who led the project mapping CO₂ on America's roads as a postdoctoral researcher at Boston University. Emissions dipped during the recession of the late 2000s, but have been ticking back up since 2013.

National fuel economy standards put in place under the Obama administration have helped temper the rise in automotive emissions because the rules require cars and trucks to use less gasoline per mile traveled. But even as vehicles have become more efficient, Americans, buoyed by a strong economy and low gas prices, have been driving more miles and buying more S.U.V.s and pickup trucks, which have lower gas mileage. Freight trucking is also on the rise.

The Trump administration is expected to finalize a rollback of efficiency standards for passenger vehicles this month, a move that could significantly increase future emissions from America's cars and trucks.

Emissions From Driving Have Grown Fastest in America's Cities and Suburbs

Boston University's emissions database, first published in 2015 and updated this month with an additional five years of data, reveals that much of the increase in driving-related CO₂ has occurred in and around cities.

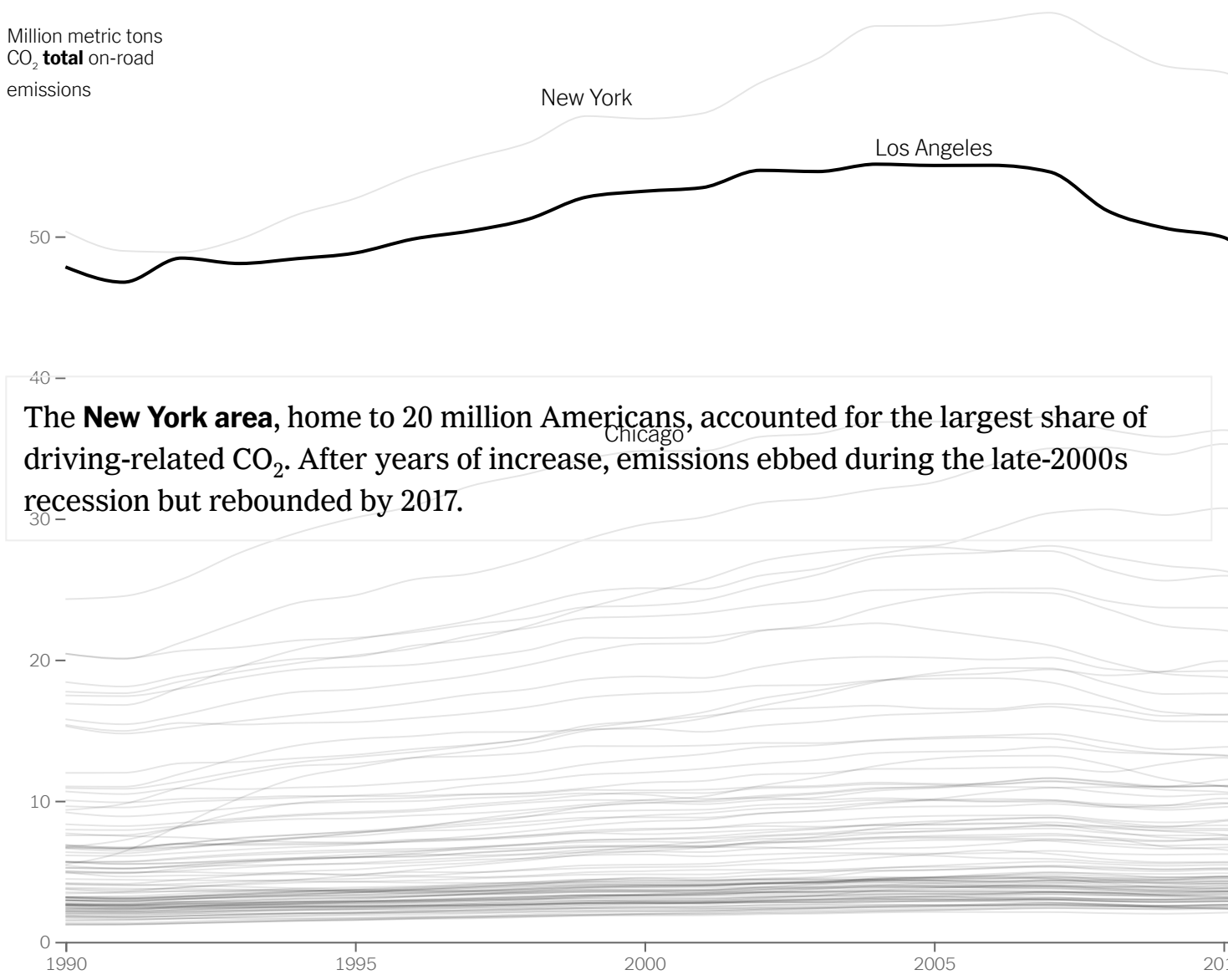
Suburban driving, including commuting, has been a major contributor to the expanding carbon footprint of urban areas, Dr. Gately said.

But, he added, "even in the densest cities, the vast majority of trips still happen in a motor vehicle." These trips include work commutes, school drop-offs and millions of other daily errands, as well as freight deliveries and other business traffic, all of which contribute to planetary warming.

The New York Times identified the 100 metropolitan areas with the highest total emissions from driving, based on Boston University's local estimates:

In nearly every metro area, total emissions have increased since 1990. Here's the trend line for the area you selected in the top map.

Million metric tons
CO₂ **total** on-road
emissions



The New York area, home to 20 million Americans, accounted for the largest share of driving-related CO₂. After years of increase, emissions ebbed during the late-2000s recession but rebounded by 2017.

In more car-dependent areas, like **Dallas-Fort Worth**, emissions from driving barely dipped during the recession and have increased rapidly in recent years.

But, adjusted for population, these cities flip: Residents in the denser, more transit-friendly **New York area** contribute far less CO₂ from driving on average than their counterparts in **Dallas**.

Per capita emissions have also **ticked up** in most metro areas in recent years. Here's the per person trend for your selected area.

Meaningfully lowering emissions from driving requires both technological and behavioral change, said Deb Niemeier, a professor of civil and environmental engineering at the University of Maryland. Fundamentally, you need to make vehicles pollute less, make people drive less, or both, she said.

Cities and states have sought to green the vehicles on their roads by providing tax incentives for electric and hybrid models, and by building more charging stations. California has the unique authority to set its own pollution standards for cars and trucks that are stricter than national rules, but the Trump administration is challenging this power.

Cities have also tried to reduce the amount people drive by encouraging carpooling, expanding transit options — including subways, light rail and rapid bus services — and planning denser, more accessible neighborhoods, too. In 2021, New York will become the first city in America to charge drivers a fee for entering highly congested areas.

In the absence of federal leadership, such local and regional initiatives have taken on new urgency.

“Every city has some workable strategies to lower vehicle-related greenhouse gas emissions,” Dr. Niemeier said, but the right mix depends on local conditions, including existing development patterns and infrastructure. “What works in New York City will not work in Dallas-Fort Worth,” she said.

No matter the mechanism, Dr. Gately of Boston University said, “Big, long-term change needs to happen in America’s cities.”

*Want climate news in your inbox? Sign up here for **Climate Fwd**, our email newsletter.*

Methodology

To create their database, Boston University researchers used federal traffic data to calculate the number of miles traveled on local segments of each road in the United States and converted those miles to carbon dioxide emissions by estimating how much fuel was consumed by different types of vehicles using those roads. The work was supported by the National Oceanic and Atmospheric Administration and NASA. More detail is available in a 2015 paper published in the journal *Proceedings of the National Academy of Sciences*. The updated dataset can be downloaded [here](#).

An additional New York Times analysis used Boston University’s on-road CO₂ data and population figures from the National Institutes of Health and the U.S. Census Bureau to derive total and per capita emissions for each metropolitan area. The 2017 census designation of counties that make up each metropolitan area was used to estimate historical populations for the metro.

[READ 575 COMMENTS](#)

City of Los Angeles Department of Transportation (LADOT)

ID Number: 9147
 www.ladottransit.com
 100 S Main St, 10th Floor
 Los Angeles, CA 90012

Chief of Transit: Mr. James Lefton
 (213) 972-8408

General Information

Urbanized Area (UZA) Statistics - 2010 Census
 Los Angeles-Long Beach-Anaheim, CA

Square Miles	1,736
Population	12,150,996
Population Ranking out of 465 UZAs	2
Other UZAs Served	

Service Consumption

Annual Passenger Miles	70,575,566
Annual Unlinked Trips	26,619,776
Average Weekday Unlinked Trips ²	87,225
Average Saturday Unlinked Trips ²	47,132
Average Sunday Unlinked Trips ²	23,354

Service Area Statistics

Square Miles	465
Population	8,626,600

Service Supplied

Annual Vehicle Revenue Miles	8,035,446
Annual Vehicle Revenue Hours	777,829
Vehicles Operated in Maximum Service	360
Vehicles Available for Maximum Service	419
Base Period Requirement	110

Financial Information

Fare Revenues Earned \$13,366,468

Sources of Operating Funds Expended

Fare Revenues	(18%)	\$13,366,468
Local Funds	(80%)	\$58,160,303
State Funds	(0%)	\$0
Federal Assistance	(0%)	\$0
Other Funds	(2%)	\$1,162,816
Total Operating Funds Expended		\$72,689,587

Sources of Capital Funds Expended

Local Funds	(100%)	\$4,350,241
State Funds	(0%)	\$0
Federal Assistance	(0%)	\$0
Other Funds	(0%)	\$0
Total Capital Funds Expended		\$4,350,241

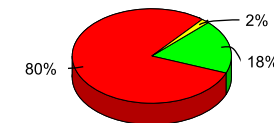
Summary Operating Expenses

Salary, Wages, Benefits	\$5,298,974
Materials and Supplies	\$41,244
Purchased Transportation	\$66,074,805
Other Operating Expenses	\$1,274,565
Total Operating Expenses	\$72,689,588

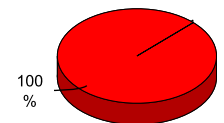
Vehicles Operated in Maximum Service and Uses of Capital Funds

Mode	Directly Operated	Purchased Transportation ¹	Revenue Vehicles	Systems and Guideways	Facilities and Stations	Other	Total
Bus	0	169	\$0	\$2,419,470	\$847,506	\$0	\$3,266,976
Commuter Bus	0	83	\$0	\$0	\$944,781	\$0	\$944,781
Demand Response	0	99	\$138,484	\$0	\$0	\$0	\$138,484
Demand Response - Taxi	0	9	\$0	\$0	\$0	\$0	\$0
Total	0	360	\$138,484	\$2,419,470	\$1,792,287	\$0	\$4,350,241

Sources of Operating Funds Expended



Sources of Capital Funds Expended

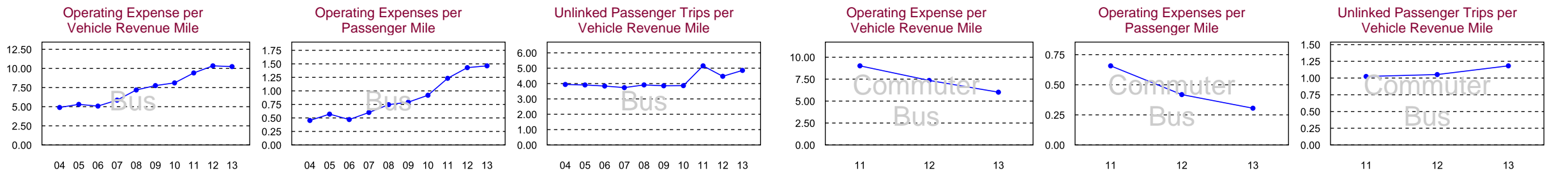


Modal Characteristics

Mode	Operating Expenses ¹	Fare Revenues ¹	Uses of Capital Funds	Annual Passenger Miles	Annual Vehicle Revenue Miles	Annual Unlinked Trips	Annual Vehicle Revenue Hours	Fixed Guideway Directional Route Miles	Vehicles Available for Maximum Service	Average Fleet Age in Years	Vehicles Operated in Maximum Service	Peak to Base Ratio	Percent Spares
Bus	\$51,135,044	\$8,984,639	\$3,266,976	34,949,665	4,992,360	24,242,563	562,010	N/A	209	8.2	169	1.59	24%
Commuter Bus	\$10,498,048	\$3,906,464	\$944,781	34,389,260	1,745,460	2,063,738	80,436	57.6	97	1.7	83	20.75	17%
Demand Response	\$9,180,717	\$176,443	\$138,484	1,040,042	1,120,976	212,513	121,857	N/A	113	4.0	99	N/A	14%
Demand Response - Taxi	\$1,875,779	\$298,922	\$0	196,599	176,650	100,962	13,526	N/A	0	N/A	9	N/A	-100%

Performance Measures

Mode	Service Efficiency		Service Effectiveness		Service Effectiveness	
	Operating Expense per Vehicle Revenue Mile	Operating Expense per Vehicle Revenue Hour	Operating Expense per Passenger Mile	Operating Expense per Unlinked Passenger Trip	Unlinked Passenger Trips per Vehicle Revenue Mile	Unlinked Passenger Trips per Vehicle Revenue Hour
Bus	\$10.24	\$90.99	\$1.46	\$2.11	4.86	43.14
Commuter Bus	\$6.01	\$130.51	\$0.31	\$5.09	1.18	25.66
Demand Response	\$8.19	\$75.34	\$8.83	\$43.20	0.19	1.74
Demand Response - Taxi	\$10.62	\$138.68	\$9.54	\$18.58	0.57	7.46



¹ Excludes data for purchased transportation reported separately

² Average UPT values not available for DT Demand Response Taxi

H:\wd Ctr EIR UN4LA Comments FINAL W\ATTACHMENT.pdf

General Information

Urbanized Area Statistics - 2010 Census
 Los Angeles-Long Beach-Anaheim, CA
 1,736 Square Miles
 12,150,996 Population
 2 Pop. Rank out of 498 UZAs

Service Consumption
 55,014,137 Annual Passenger Miles (PMT)
 18,394,160 Annual Unlinked Trips (UPT)
 60,906 Average Weekday Unlinked Trips¹
 29,816 Average Saturday Unlinked Trips¹
 17,705 Average Sunday Unlinked Trips¹

Database Information
 NTDID: 90147
 Reporter Type: Full Reporter

Service Area Statistics
 465 Square Miles
 4,849,476 Population

Service Supplied
 7,770,507 Annual Vehicle Revenue Miles (VRM)
 807,047 Annual Vehicle Revenue Hours (VRH)
 359 Vehicles Operated in Maximum Service (VOMS)
 429 Vehicles Available for Maximum Service (VAMS)

Modal Characteristics

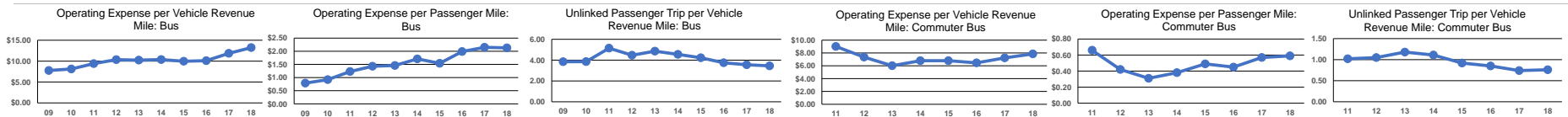
Modal Overview	Vehicles Operated in Maximum Service		Uses of Capital Funds					Total
	Directly Operated	Purchased Transportation	Revenue Vehicles	Systems and Guideways	Facilities and Stations	Other		
Commuter Bus	-	96	\$5,065,158	\$0	\$15,537,967	\$0	\$20,603,125	
Demand Response	-	84	\$408,717	\$0	\$2,196,752	\$0	\$2,605,469	
Demand Response - Taxi	-	9	\$0	\$0	\$0	\$0	\$0	
Bus	-	170	\$5,251,325	\$0	\$29,440,392	\$0	\$34,691,717	
Total	-	359	\$10,725,200	\$0	\$47,175,111	\$0	\$57,900,311	

Operation Characteristics

Mode	Operating Expenses	Fare Revenues	Uses of Capital Funds	Annual Passenger Miles	Annual Unlinked Trips	Annual Vehicle Revenue Miles	Annual Vehicle Revenue Hours	Fixed Guideway Directional Route Miles	Vehicles Available for Maximum Service	Vehicles Operated in Maximum Service	Percent Spare Vehicles	Average Fleet Age in Years ⁴
Commuter Bus	\$14,025,276	\$3,767,100	\$20,603,125	23,707,623	1,355,077	1,783,811	86,451	0.0	108	96	11.1%	5.4
Demand Response	\$9,782,430	\$156,021	\$2,605,469	946,350	202,456	1,003,698	120,393	0.0	107	84	21.5%	7.8
Demand Response - Taxi	\$1,224,355	\$158,450	\$0	116,320	63,846	122,892	8,283	0.0	9	9	0.0%	0.0
Bus	\$64,307,586	\$7,186,819	\$34,691,717	30,243,844	16,772,781	4,860,106	591,920	0.0	205	170	17.1%	5.4
Total	\$89,339,647	\$11,268,390	\$57,900,311	55,014,137	18,394,160	7,770,507	807,047	0.0	429	359	16.3%	

Performance Measures

Mode	Service Efficiency			Service Effectiveness			
	Operating Expenses per Vehicle Revenue Mile	Operating Expenses per Vehicle Revenue Hour	Mode	Operating Expenses per Passenger Mile	Operating Expenses per Unlinked Passenger Trip	Unlinked Trips per Vehicle Revenue Mile	Unlinked Trips per Vehicle Revenue Hour
Commuter Bus	\$7.86	\$162.23	Commuter Bus	\$0.59	\$10.35	0.8	15.7
Demand Response	\$9.75	\$81.25	Demand Response	\$10.34	\$48.32	0.2	1.7
Demand Response - Taxi	\$9.96	\$147.82	Demand Response - Taxi	\$10.53	\$19.18	0.5	7.7
Bus	\$13.23	\$108.64	Bus	\$2.13	\$3.83	3.5	28.3
Total	\$11.50	\$110.70	Total	\$1.62	\$4.86	2.4	22.8



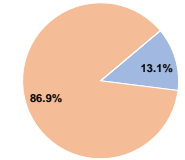
Notes:
⁴Demand Response - Taxi (DT) and non-dedicated fleets do not report fleet age data.
¹Average Unlinked Trips not available for Demand Response Taxi.

Financial Information

Sources of Operating Funds Expended

Fares and Directly Generated	\$12,173,126	13.1%
Local Funds	\$80,759,730	86.9%
State Funds	\$0	0.0%
Federal Assistance	\$0	0.0%
Total Operating Funds Expended	\$92,932,856	100.0%

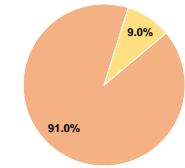
Operating Funding Sources



Sources of Capital Funds Expended

Fares and Directly Generated	\$0	0.0%
Local Funds	\$52,668,509	91.0%
State Funds	\$0	0.0%
Federal Assistance	\$5,231,802	9.0%
Total Capital Funds Expended	\$57,900,311	100.0%

Capital Funding Sources



Summary of Operating Expenses (OE)

Labor	\$6,370,485	7.1%
Materials and Supplies	\$47,780	0.1%
Purchased Transportation	\$79,314,365	88.8%
Other Operating Expenses	\$3,607,017	4.0%
Total Operating Expenses	\$89,339,647	100.0%
Reconciling OE Cash Expenditures	\$3,593,209	
Purchased Transportation (Reported Separately)	\$0	

**BRIEF**

New RecyclA settlement: Relaxed hauler targets, \$9M in customer relief

By Cole Rosengren

Published Feb. 14, 2019

Dive Brief:

- After months of negotiation, the Los Angeles Bureau of Sanitation (LASAN) has reached a settlement agreement with the seven RecyclA service providers. Among multiple changes, it is designed to give them more leeway on meeting contract targets, while reducing near-term costs for customers and reinforcing diversion goals.
- If approved by the Los Angeles Board of Public Works (BPW) on Feb. 15, customers will no longer pay access/distance fees for blue bin recycling. The city will split the expense of any fees, including retroactive charges, at an initial cost of \$9.12 million. Contamination levels up to 20% will also be allowable through 2020 in an extended "optimization period."
- Companies now have until Jan. 31, 2023 to meet initial disposal reduction targets and will pay lower liquidated damages if they fail to do so. 2020 rate increases for blue bin and green bin organics service have been raised to 3.5% beyond CPI (plus an automatic 0.25% increase to reflect low commodity values), and an automatic 3% increase for overall cost of service will take effect in 2022.

Dive Insight:

The RecyclA franchise saga has been a long, ambitious and contentious one. Waste Management, Republic Services, Athens

Services, Universal Waste Systems, CalMet Services, NASA Services and Ware Disposal have lucrative 10-year contracts (with the option to extend) but have been working overtime to meet elevated standards amid ongoing public scrutiny.

While LASAN notes that initial missed collection issues are old news, the mounting expense of additional fees has become a serious issue. On top of higher baseline costs, the fees have spurred vitriol and pushback from multiple real estate and business interests. Whether or not any of these changes will quiet the program's critics, or have any effect on ongoing legal proceedings, remains unclear.

An estimated 19,600 of the program's 66,000 customers are currently getting extra charges based on access or distance, according to LASAN. The city's initial \$9.12 million contribution is slated to cover any charges incurred Feb. 2018-June 2019, and budget reserves can cover future expenses through at least FY20. LASAN has committed to spending upward of \$94.2 million on this program through 2027 if necessary.

Described as the "Removing Barriers to Recycling" program, these new terms will also require service providers to offer robust and ongoing education, including up to four warnings for customers that surpass the 20% contamination threshold.


Multiple companies told Waste Dive this had been a challenge last fall, but said they were largely holding off on contamination charges out of good faith. Temporarily raising the acceptable threshold from 10% to 20% and agreeing to waive extra charges until 2020 runs counter to the current industry narrative at a national level — but it's a sign of how delicate the customer relationship is right now in this program.

As service providers deal with tough national commodity market trends, elevated organics diversion requirements and future infrastructure expenses, it's clear some may have underestimated their initial bids. Even though the timing has


been delayed, the newly agreed-upon rate increase schedule can be expected to help fill that gap. At the same time, they still need engaged customer participation to start making headway on mandated disposal reduction targets, so perceptions of excessive rate increases could create future tensions.

Los Angeles still has a stated goal of 90% landfill diversion by 2025, but the city has revised its RecyclA contract target from 45% to 35% diversion by 2023. A lack of recent data (another RecyclA priority) makes it hard to assess where that diversion rate currently stands. Regardless of this new financial compromise, it's clear significant progress will need to be made by all parties in order to hit the mark.

Recommended Reading:

 Waste Dive

Next up for the RecyclA experiment — optimization [↗](#)

 Waste Dive

Los Angeles BPW approves RecyclA facility plan, plus \$6M for consultant [↗](#)