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IV. Environmental Impact Analysis

K.2 Public Services - Police/Sheriff

1. Introduction

This section addresses the proposed Project's potential impacts on the facilities and services administered by the City of Los Angeles Police Department (the "City Police Department") and the County of Los Angeles Sheriff's Department (the "County Sheriff's Department"). Within the City of Los Angeles, police services are provided by the City Police Department. Within unincorporated portions of the County of Los Angeles, police services are provided by the County Sheriff's Department. The analysis focuses on whether the projected populations and land uses, as proposed under the Project, would exceed the staffing capabilities and facilities of the City Police Department and of the County Sheriff's Department.

2. Environmental Setting

The Project Site is located within the jurisdictional boundaries of both the City and County of Los Angeles. On-site law enforcement, within their respective portions of the Project Site, is provided by the City Police Department and the County Sheriff's Department. In addition, the Applicant employs a private security force to patrol on-site areas.

a. Regulatory Framework

(1) City of Los Angeles

(a) *City Charter*

The City Charter establishes the City Police Department as having the power and duty to enforce the penal provisions of the City Charter, City ordinances and state and federal law. The City Charter goes on to indicate that the members of the department shall have the powers and duties of peace officers as defined by state law. The City Charter goes on to state that the officers and employees of the City Police Department shall have

the power and duty to protect lives and property in case of disaster or public calamity. Further, the City Charter defines the roles of the City Police Department, including the Board of Police Commissioners and the Chief of Police.

(b) Los Angeles General Plan

The Los Angeles Citywide General Plan Framework Element contains policies and objectives which address the provision of police services in the City of Los Angeles and the City Police Department. These policies and objectives deal with insuring adequate service infrastructure as population growth occurs via monitoring of services, supporting the provision of additional police and pursuing additional funding for additional officers. In addition, the Safety Element of the Los Angeles General Plan addresses natural hazard issues related to City Los Angeles Police Department resources, e.g., traffic safety during or following a disaster. The Safety Element recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies.

(c) Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan

Although most of the Project Site is currently located in an unincorporated area that is not reflected in the land use policies of the Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass Community Plan, portions of the Project Site and the City areas closest to the Project Site are located within the Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass Community Plan area. Under existing conditions, approximately 95 acres of the Project Site are located in the City of Los Angeles. With approval of the Project's proposed annexation/detachment, a total of approximately 139 acres would be located in the City of Los Angeles. The Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan area currently consists of 6,153 acres; thus, the addition of 44 net acres would increase the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan area by 0.72 percent, to 6,197 acres. A brief summary of the goals and objectives of the Community Plan with regard to police services is as follows.

A goal of the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan is to ensure that public facilities such as fire stations, libraries, schools, parks, and police stations are developed in substantial conformance with the standards of need, site area, design, and general location identified in the Service Systems Element and the Safety Element of the General Plan. Such development shall be sequenced and timed to provide an efficient and adequate balance between land use and public services. The Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan recognizes the need to modernize existing public facilities while adequately protecting the environmental quality of the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass

Community Plan area. Objective 8-1 of the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan indicates that adequate police facilities and personnel need to be available to correspond with the population and service demands of the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area. Policy 8-1.1 implements this objective, by requiring coordination with the City Police Department as part of the review of large development projects and General Plan Amendments affecting land use to determine the impact on service demands.

(2) County of Los Angeles

(a) County General Plan

The existing County General Plan Public Facilities Element (last amended November 2, 1989) does not contain policies and goals pertaining to the regulation of the County Sheriff's Department; however, the County is in the process of updating the Public Services and Facilities Element. The draft updated Public Services and Facilities Element outlines goals and policies to maintain an effective police force and provide safety and protection for the citizens of the County of Los Angeles. The draft updated Public Services and Facility Element also states that to effectively and efficiently fulfill all of these functions, the County Sheriff's Department should be staffed at a level of one (1) deputy sheriff per each 1,000 population. Another priority for the County Sheriff's Department recognized in the General Plan Comprehensive Update and Amendment program is the repair or replacement of outdated facilities. Several goals and policies are outlined to achieve these objectives, including: Policy PS 8.1, which promotes phased development, whereby land use proposals are developed in conjunction with approved law enforcement capabilities; Policy PS 8.2, which supports the expansion of law enforcement facilities where needed; and Policy PS 8.3, which encourages the ongoing evaluation of law enforcement funding sources.

b. Existing Conditions

(1) City of Los Angeles

The City Police Department is divided into four (4) bureaus throughout the City: the Central, West, South, and Valley Bureaus. The four (4) Bureaus are further divided into 21 service areas, which are serviced by the City Police Department's 21 community police

stations.³⁴⁷ Within each service area, smaller geographic units referred to as Reporting Districts are used for resource deployment purposes as well as to assist in compiling statistical data. Further, each City Police Department community police station is apportioned into small neighborhood units, referred to as Basic Car Areas. There are roughly eight (8) to ten (10) Basic Car Areas per community police station. Each Basic Car Area has one patrol car permanently assigned to provide service to that area 24 hours a day, with staff rotating through a compressed work schedule with officers assigned on either a 10-hour or 12-hour shift. While other police vehicles may be present in the Basic Car Area, the Basic Car has priority in answering all calls within its boundaries. The City Police Department is an organization composed of approximately 14,000 personnel, with 10,354 sworn and 3,640 civilian employees.³⁴⁸ To determine an adequate level of service capacity, the City Police Department considers 25 factors, crime trends and demographics to achieve an average seven minute emergency response time and 40 minute availability of patrol.

Currently, the City portion of the Project Site is located in the Hollywood Community Police Station service area; however, the City Police Department is in the process of reorganizing the boundaries of the responding areas.³⁴⁹ This change will result in the redistricting of the Project Site into the North Hollywood Community Police Station service area, with its station located at 11640 Burbank Boulevard, North Hollywood. Currently, the Project Site is within five (5) miles of the North Hollywood Community Police Station, as shown in Figure 208 on page 1726. Consequently, the City Police Department has indicated that performance ratios for the North Hollywood Community Police Station should be used to evaluate potential Project impacts.³⁵⁰

As of December 2007, there are currently 268 personnel assigned to the North Hollywood Community Police Station, including 247 sworn officers and 21 civilian support staff.³⁵¹ The City Police Department has indicated that the North Hollywood Community

³⁴⁷ *City of Los Angeles Police Department, 2007–2008 Media Relations Handbook, available at: <http://www.lapdonline.org/>, accessed June 4, 2008.*

³⁴⁸ *City of Los Angeles Police Department, Office of the Chief of Police, available at: http://www.lapdonline.org/inside_the_lapd/content_basic_view/834, accessed June 4, 2008.*

³⁴⁹ *Public Service Response Letter from William J. Bratton, City of Los Angeles Police Department Chief of Police, dated February 6, 2008.*

³⁵⁰ *Ibid.*

³⁵¹ *Ibid.*

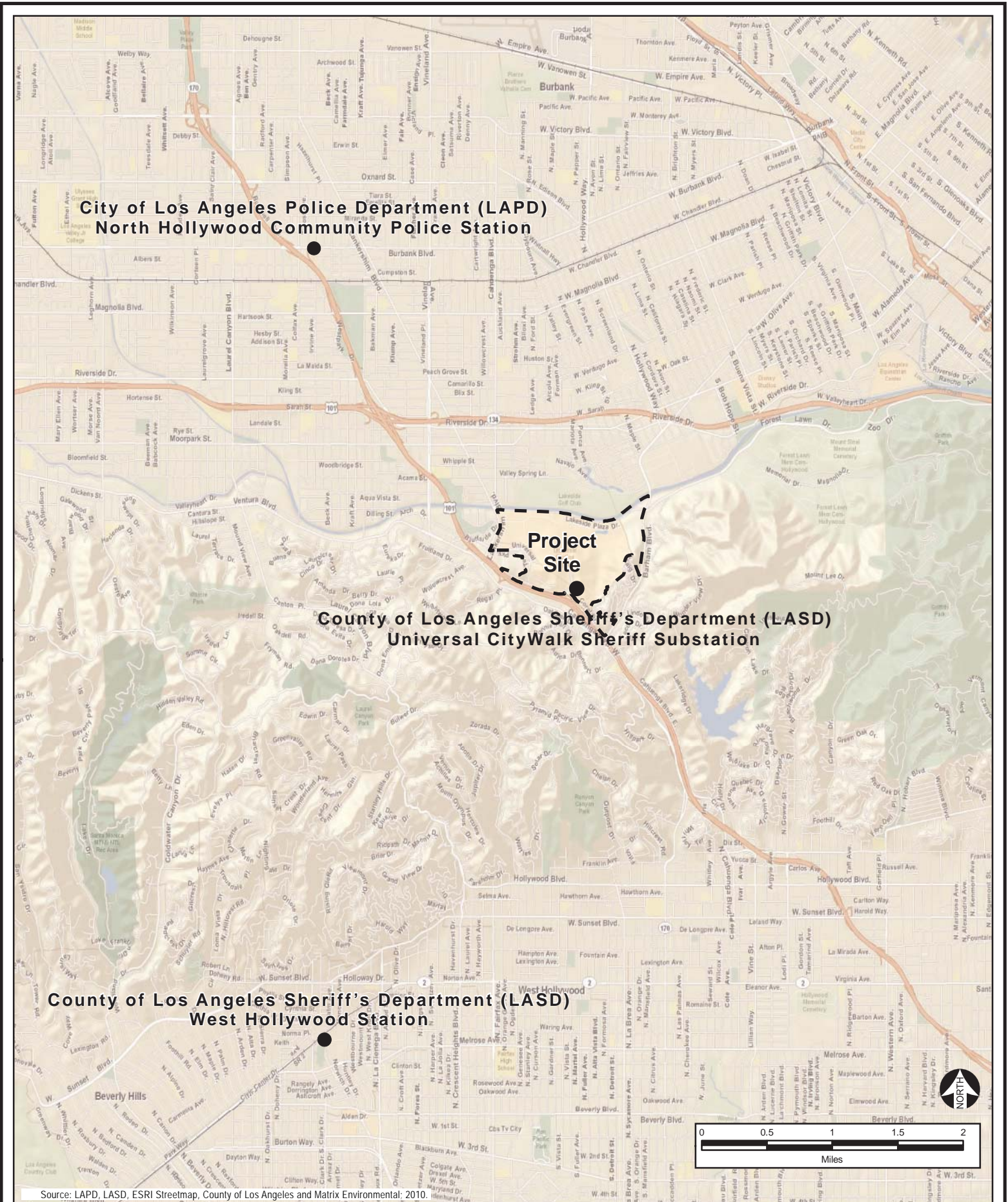


Figure 208

Existing City of Los Angeles Police Department and County of Los Angeles Sheriff's Department Facilities

Police Station is currently operating at more than full capacity, and there is an existing need to add square footage to the existing structure. The Project Site is located in Reporting District 1588.

The North Hollywood Community Police Station service area has a residential population of approximately 246,000 persons, resulting in an officer-to-resident ratio of 0.995 officers to 1,000 residents. By comparison, the 2006 Citywide service area residential population was approximately 3.8 million persons, with a total of 9,398 sworn officers of all ranks, and an officer-to-population ratio of 2.47 officers to 1,000 residents.³⁵² The officer-to-resident ratio per Reporting District is information that is not compiled by the City Police Department.

Response times are an additional indicator used to determine the adequacy of police protection. As of June 2007, the average response time for emergency calls in the North Hollywood Community Police Station service area is 7.3 minutes, marginally higher than the Citywide average of 7.0 minutes. There are currently no plans for new City Police Department stations or plans to expand existing City Police Department stations in the Project vicinity.³⁵³

The City Police Department has indicated that the North Hollywood Community Police Station service area currently experiences a steady amount of property crimes, primarily burglary and burglary from motor vehicles.

In addition to providing police protection services, the City Police Department provides traffic control on City of Los Angeles streets in the Project area, including those within the City portion of the Project Site. Further, the City Police Department also assists the Applicant's private security staff with traffic control whenever conditions arise that requires this type of coordination.

(2) County of Los Angeles

The County Sheriff's Department is divided into three (3) Field Operations Regions and provides services to 40 contract cities, 90 unincorporated communities, nine (9)

³⁵² *City of Los Angeles Police Department, 2006 Statistical Digest.*

³⁵³ *Public Service Response Letter from William J. Bratton, City of Los Angeles Police Department Chief of Police, dated February 6, 2008.*

community colleges, the Metropolitan Transportation Authority, and 47 Superior Courts.³⁵⁴ The County Sheriff's Department currently maintains a staff of 14,995 personnel, including 8,561 sworn officers.³⁵⁵ The County Sheriff's Department's 23 patrol stations protect both unincorporated communities and contract cities within their assignment areas. Deployment of Deputies within the unincorporated portions of Los Angeles County is based on an "appropriate level of service" including consideration of residential population, type and frequency of crimes, service area size, actual and expected service calls, transient and visitor population, and response time which is determined at the divisional and station level. Contract cities are able to choose a level of service that best meets the needs of their respective communities.

The Project Site is served by the County Sheriff's Department's Universal CityWalk Sheriff Substation, located on the Project Site at 1000 Universal Studios Boulevard, Universal City, as shown in Figure 208 on page 1726. Staffing for the Substation consists of 1 lieutenant, 2 sergeants, 1 detective, 1 team leader, and 12 deputies. The Universal CityWalk Sheriff Substation's hours of operation are 7:00 A.M. to 4:00 A.M. the next day, or 21 hours per day. This substation is part of the larger West Hollywood Sheriff's Station, located at 780 North San Vicente Boulevard, approximately 6.38 miles from the Project Site.³⁵⁶ There are currently 60 sworn personnel at the West Hollywood Sheriff's Station, with 48 assigned to patrol duties in the City of West Hollywood, and 12 assigned to patrol duties in unincorporated areas of Los Angeles County.³⁵⁷ The station currently maintains an officer-to-resident ratio of 1.57 to 1,000 residents. As discussed above, the General Plan Comprehensive Update and Amendment program states that the County Sheriff's Department should be staffed at a level of one (1) deputy sheriff per each 1,000 population. As there are few residences in the unincorporated portions of the West Hollywood Station's service area that are outside the City of West Hollywood, sheriff services largely are targeted towards the City of West Hollywood. The annual station activity at the West Hollywood Sheriff's Station is currently 63,391 incidents, with 22,374 service calls, and 41,017 observation-related activities.³⁵⁸ The County Sheriff's Department indicates that the

³⁵⁴ *Los Angeles County Sheriff's Department, 2006 Year in Review Report – Introduction, website: <http://www.lasd.org/sites/YIR/2006/visuals/4.pdf>, accessed May 30, 2008.*

³⁵⁵ *Los Angeles County Sheriff's Department, 2006 Year in Review Report – Department Personnel Strength, website: <http://www.lasd.org/sites/YIR/2006/visuals/54.pdf>, accessed May 30, 2008.*

³⁵⁶ *Public Service Response Letter from Leroy D. Baca, County of Los Angeles Sheriff's Department Sheriff, dated November 16, 2007.*

³⁵⁷ *Ibid.*

³⁵⁸ *Public Service Response Letter from Leroy D. Baca, County of Los Angeles Sheriff's Department Sheriff, dated November 16, 2007.*

average countywide response times are 10 minutes for emergencies, 20 minutes for priorities, and 60 minutes for routine calls for service.³⁵⁹ Further, the County Sheriff Department indicates that response times for the Universal CityWalk Sheriff Substation are considerably less than the Countywide average due to the proximity of the substation to incidents responded to; as most calls are responded to on foot within one (1) minute. On occasion, deputies will use a patrol car to respond to a traffic-related incident in a parking area, or to pursue a suspect vehicle leaving the Project Site.

Within the County portion of the Project Site, as well as on Project area freeways (e.g., US 101), traffic control is provided by the California Highway Patrol. Additionally, the California Highway Patrol also assists the Applicant's private security staff with traffic control whenever conditions arise that requires this type of coordination.

3. Environmental Impacts

a. Methodology

The impact of the proposed Project on police/sheriff services is based mainly on a comparison of the future on-site residential population that would be served by the City Police Department and County Sheriff's Department to the target ratio standards for the particular station, as defined by the respective department. Statistical data is not currently maintained by the City Police Department and County Sheriff's Department for police/sheriff service requirements related to the non-residential population in a station's service area. Thus, the assessment of potential impacts to police/sheriff services is determined based on the following steps: (1) identify the primary police/sheriff stations that serve the Project Site; (2) forecast the resident population increase generated by the Project, including identifying the respective population increases within the City Police Department and County Sheriff's Department service areas at the time of Project build out; (3) combine the residential population increase resulting from the Project with the forecasted area residential population; and (4) compare the combined population to the target officer-to-residential ratio determined by the City Police Department and County Sheriff's Department. Additionally, a qualitative analysis of the potential impacts of non-residential development on police/sheriff services is included.

³⁵⁹ *Ibid.*

b. Thresholds of Significance

Potential impacts upon police/sheriff services are based on the availability of police officers, equipment, and facilities to support the additional demand created by the residential population generated by the proposed Project. As mentioned above, statistical data for police/sheriff requirements related to the non-residential population in a station's service area is not maintained by either the City Police Department or County Sheriff's Department. Thus, potential impacts on the need for new officers are based on the existing ratios of officers to residents as well as the additional demand for services attributable to the Project's non-residential population.

The *City of Los Angeles CEQA Thresholds Guide* (p. K.1-2) states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

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

The first and third factors above are two components of the calculation of the significance of a project's impact as they combine to identify a project's demand for police services. The second factor indicates that Project impacts should be analyzed at Project buildout relative to the services that would be available at that time. However, the state CEQA Guidelines indicate that the analyses presented in an environmental impact report reflect the amount of impact relative to existing, rather than future, conditions.³⁶⁰ Therefore, the analysis of Project impacts presented in this section is based on the impact of the Project relative to existing conditions. An analysis pursuant to the second factor identified above (i.e., Project impacts at Project buildout relative to the police services that would be available at that time) is presented in Subsection 4.0, Cumulative Impacts.

³⁶⁰ CEQA, *CEQA Guidelines, Article 9, Section 15125(a)*.

Based on the above factors, the proposed Project would have a significant impact on police services if:

- The Project would generate demand for additional police/sheriff protection services that substantially exceeds the capability of the City Police Department or County Sheriff's Department to serve the Project Site.
- The Project would cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project.

c. Project Design Features

In addition to standard City and County police/sheriff requirements, a number of project design features would be implemented in order to address police/sheriff issues. For example, as part of the proposed Project, a construction traffic management plan would be developed to reduce potential Project construction impacts on the delivery of police/sheriff services. The construction traffic management plan would outline adequate measures to ensure emergency vehicle access during all aspects of Project construction, including, but not limited to, the use of flagmen during partial closures to streets surrounding the Project Site to facilitate the traffic flow until construction is complete. Further, the Project would include the implementation of security measures during construction in areas that are accessible to the general public to help reduce any increased demand on City Police Department and County Sheriff's Department services, including fencing construction areas, providing security lighting, and providing security personnel to patrol construction sites. Additionally, the proposed Project would include design features to incrementally reduce the increase in impacts to police services during Project operation. These project design features would include recommendations included in the City Police Department's Design Out Crime Guidelines and may include an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. Implementation of the Project would also provide an increased number of on-site security personnel commensurate with development levels within the Studio, Business, and Entertainment Areas, which, based on historic trends, provides adequate security levels. Further, emergency access to the Project Site would be provided by the existing and proposed on-site street systems. City and County review of street widths, street lighting, and street signage would be based on an evaluation of requirements for the provision of emergency access, and would ensure access is maintained.

d. Project Impacts

Under the proposed Project, approximately 139 acres of the Project Site would be located within the City of Los Angeles, and the remaining approximately 252 acres of the Project Site would be located within the boundaries of the County of Los Angeles. Proposed land uses within the City include all of the residential development (2,937 units), 180,000 square feet of community- and neighborhood-serving commercial uses, and 300,000 square feet of studio and studio office uses. Proposed land uses in the County include approximately 1.59 million square feet of net new studio, entertainment, hotel, and office uses. The hotel would be up to 450,000 square feet and would include up to 500 hotel rooms and related hotel facilities. The analysis of potential Project impacts is based on the maximum amount of development that could potentially occur by the year 2030 under the proposed City and County Specific Plans.

As discussed above, the proposed Project would include recommendations included in the City Police Department's Design Out Crime Guidelines and may include an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. Further, emergency access to the Project Site would be provided by the existing and proposed street systems external to the Project Site as well as a network of on-site streets (see Figure 21, Section II, Project Description, of this Draft EIR).

(1) Construction Impacts

(a) City of Los Angeles Police Department and County of Los Angeles Sheriff's Department Facilities

The City Police Department has indicated that the roadways in the Project vicinity carry high volumes of traffic during the A.M. and P.M. peak travel periods, and that construction would likely have an impact on emergency vehicles needing to access Lankershim Boulevard. The City Police Department has indicated that during construction, emergency responders may need to consider alternative routes when responding to calls in this area, particularly during peak traffic periods. This condition may cause a delay in the response time for emergency responders. In addition, the City Police Department has indicated they currently deal with many crimes associated with construction sites, such as burglaries, thefts, and vandalism. According to the Department, the City Police Department has experienced construction site related crimes even when developers have taken measures such as hiring security guards to reduce crime. The City Police Department anticipates responding to calls of this nature during construction, and has expressed

concern that they may need to, at times, deploy police resources to monitor the locations if such crimes begin to occur.

Similarly, the County Sheriff's Department has indicated that construction of the proposed Project would increase the need for sheriff's services on the Project Site. The County Sheriff's Department has indicated that given the types of equipment that would be housed at the Project Site, there is the possibility that crime could take place. Additionally, the County Sheriff's Department expressed concern that Project construction would increase and affect the emergency response times of the County Sheriff's Department.

To incrementally reduce the potential increase in construction-related impacts to City Police Department and County Sheriff's Department services, access to the Project Site and area roadways would be maintained during construction. In the event that construction activities do require lane closures, emergency access would remain unimpeded through the use of flagmen, and other controls. Although there is the potential, that at some locations, at certain times, traffic congestion may increase due to construction on off-site roadways, significant environmental impacts are not expected to occur at these locations based on the Applicant implementing the construction traffic management plan described above.

For those portions of the Project Site that are accessible by the general public, the implementation of security measures, included as Project Design Features (see above), during construction activities would help to reduce any increased demand on City Police Department or County Sheriff's Department services. These security features would include fencing all construction areas prior to the start of construction, providing security lighting at construction areas, and providing on-site security personnel at construction sites. The implementation of these features would reduce the increase in demand for City Police Department and County Sheriff's Department services, and construction impacts are anticipated to be less than significant.

Project construction would result in a temporary increase in the number of workers to the Project area. It is anticipated that 16,559 jobs would be directly associated with the construction of the Project between Project initiation and Project build-out in 2030. Thus, there is the potential for an increased demand in City Police Department and County Sheriff's Department services. However, this increase is anticipated to be negligible, as construction workers would be occupied with construction activities during work hours and would likely return to their place of residences upon completion of daily construction activities. Therefore, construction-related impacts associated with police/sheriff services would be less than significant with regard to both City Police Department and County Sheriff's Department services.

(2) Operational Impacts

(a) City of Los Angeles Police Department Facilities

Under the proposed Project, 2,937 residential dwelling units would be constructed in the Mixed-Use Residential Area, and would generate an estimated residential population of 6,450 residents by Project buildout in 2030. Under the proposed Project, this residential population would be located entirely within the jurisdictional boundaries of the City of Los Angeles. The Project would also include the development of 480,000 square feet of community- and neighborhood-serving commercial development, studio and studio office uses within the City of Los Angeles, which would generate 1,365 new on-site jobs within the City of Los Angeles.³⁶¹ These additional land uses would generate additional demand for City police resources.

The City Police Department has indicated that the existing North Hollywood Community Police Station is operating at more than full capacity and that there is a need to add square footage to the existing facility to ease overcrowding. Currently, the North Hollywood Community Police Station service area experiences a steady amount of property crimes, including burglaries and burglaries from motor vehicles. The City Police Department has indicated that the immediate impacts of the Project would be mostly traffic related and affect Barham Boulevard, Lankershim Boulevard, Universal Hollywood Drive, and the 101 and 170 Freeways. Increases in traffic would need to be monitored by officers for traffic violations and other incidents (i.e., accidents). The City Police Department has also indicated that the new residential and commercial development would increase the number of crimes in the Project vicinity, particularly property crimes (such as robberies, burglary, and burglaries from motor vehicles) and therefore, would result in a greater demand for police services. This could be a potentially significant impact.

While the proposed Project is anticipated to affect vehicle/capacity ratios and the level of service of roadways in the Project vicinity, the implementation of a Transportation Demand Management program, regional and sub-regional transportation improvements, and Project-specific intersection improvements would help to reduce Project-related traffic impacts on area intersections and roadways. However, based on performance criteria established by the City of Los Angeles Department of Transportation, traffic conditions at

³⁶¹ For further information regarding the population and employment estimates, refer to Section IV.N, *Population, Housing and Employment*, of this Draft EIR.

9 intersections would not be mitigated to less than significant levels, as discussed in Section IV.B, Traffic/Circulation, of this Draft EIR.

All other traffic analysis locations in the future with the Project would operate at similar, and in some cases better conditions, than future conditions without the proposed Project. However, Project development could result in an increase in response time along sections of Campo de Cahuenga Way, Cahuenga Boulevard, and Lankershim Boulevard in the area of the Project Site. The increase in response time could be avoided by the City Police Department using an alternate route. The proposed Project would add new on-site streets, particularly in the Mixed-Use Residential Area, thus creating additional alternative routes that the City Police Department and the County Sheriff's Department could utilize to respond to on-site calls for service. Additionally, any increase in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. This impact is not considered significant since emergency response times would not be substantially affected given that there is a significant traffic impact at limited locations and the availability of alternative routes given the street pattern in the area surrounding the Project Site.

Increased population due to the proposed Project's development would result in an increase in calls for service within the Project area. The types of crimes occurring at the Project Site are anticipated to be comparable to those associated with residential uses and the types of commercial uses proposed (e.g., burglaries, robberies, and burglaries from autos). The City Police Department has indicated that in order to handle the increase in calls for service, they would require more personnel to ensure that the North Hollywood Community Police Station service area is able to maintain current service levels. Based on current officer-to-resident ratios, the increase in residential population would generate the need for six (6) new officers in the City of Los Angeles ($6,450 \text{ additional residents} / 1,000 \times 0.995 = 6.4$). If the new officers were not provided, the ratio would fall from 0.995 officers per 1,000 residents to 0.978 officers per 1,000 residents ($247 \text{ sworn officers} / [252,450 \text{ total residential population} / 1,000]$)³⁶². Additionally, although the City Police Department does not maintain statistical data on the non-residential population of North Hollywood Community Police Station area, the City Police Department has indicated that the non-residential development under the proposed Project would increase the demand for City Police Department services.

³⁶² *Derived from the existing population of the North Hollywood Community Police Station (246,000) identified in the City of Los Angeles Police Department public service response letter with the total population from the Project in the City (7,815) added to this number.*

In order to maintain existing service levels, the City Police Department indicated that a reorganization of the North Hollywood Community Police Station's Basic Car Areas and the provision of personnel to ensure that the Basic Car Areas are fully staffed would be required. As described above in Section 2.b.(1), each City Police Department police station is apportioned into Basic Car Areas. Each Basic Car Area has one patrol car permanently assigned to provide service in that neighborhood.

The City Police Department has indicated that the provision of desk space for two officers within a community serving facility in the Mixed-Use Residential Area, as proposed in Mitigation Measure K.2-1, would enable the City Police Department to ensure adequate police services and would be sufficient to support the reorganization of the North Hollywood Community Police Station's Basic Car Areas. As such, the provision of desk space for two officers within a community serving facility in the Mixed-Use Residential Area would enable the City Police Department to ensure adequate police protection services within the Project Site. Further, the City Police Department suggested initiating a Business Improvement District that would allow for the routine deployment of bicycle security ambassadors and a "clean team" to remove trash, debris, graffiti, etc.

As mentioned above, the proposed Project would include design features to incrementally reduce the increase in impacts to City Police Department police services. These design features would include recommendations included in the City Police Department's Design Out Crime Guidelines, and may include an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. Further, emergency access to the Project Site would be provided by the existing and proposed on-site street systems. City review of street widths, street lighting, and street signage would be based on an evaluation of requirements for the provision of emergency access, and would ensure access is maintained. Implementation of the Project would result in an increase in the number of on-site security personnel commensurate with development levels within the Studio, Business, and Entertainment Areas, which, based on historic trends, provides adequate security levels. In addition, given that there is no evidence of a relationship between on-site crime incidents and crime within the adjacent residential neighborhoods, it is concluded that on-site growth would not increase off-site crime.

With regards to the sale of alcoholic beverages, the proposed City Specific Plan would provide regulations governing the sale of alcoholic beverages for on-site consumption in the City portions of the Project Site. In particular, the proposed City Specific Plan would regulate the number of establishments authorized to sell and serve alcohol and would provide operational conditions. Such conditions would include hours of operation, requirements for employee training, seating provisions, security features, and

police consultation, to name a few. These Specific Plan features would provide an adequate approach for minimizing security issues related to the sale of alcoholic beverages. While the proposed City Specific Plan would increase the number of establishments selling alcoholic beverages (for both on-site and off-site consumption) over existing conditions, this increase is included in the analysis of the Project's potential impacts to City police services.

It should also be noted that the proposed Project would generate revenues to the City which could be applied to the provision of police facilities and/or related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the appropriate decision makers. Since it cannot be guaranteed that the proposed Project's revenue contributions would be applied to police services, it is conservatively concluded that the proposed Project's demands would result in a reduction in the service ratio, and thus, impacts prior to mitigation could potentially be significant.

Mitigation measures have been included below to assure that the proposed Project has addressed these issues in a manner that would help to limit the increase in demand for City Police Department police services.

(b) County of Los Angeles Sheriff's Department Facilities

The proposed Project would add an estimated 3,828 new on-site jobs in the County portion of the Project Site once Project buildout has occurred by the year 2030. This increase in employment is anticipated to result in an increase in demand for sheriff services on the Project Site.

The County Sheriff's Department has indicated that the West Hollywood Sheriff's Station is already operating above capacity. Specifically, a recent County Sheriff's Department survey suggests the need for an additional 33,000 square feet to meet current staffing levels. The County Sheriff's Department has also indicated that the Project would place an additional burden upon the station's personnel and resources. Specifically, with the proposed Project, existing Sheriff's Department staffing would be increased to add additional sergeants, deputies, and support staff. The County's Sheriff's Department has indicated that the full staffing model under the proposed Project would be: one lieutenant, four sergeants, one team leader deputy, one detective, 18 deputies, four custody assistants, two professional administrative staff, and three law enforcement technicians.³⁶³

³⁶³ *Written correspondence from Leroy D. Baca, County of Los Angeles Sheriff's Department, dated February 11, 2010.*

A portion of the required deputies would be needed to patrol the new County portions of the Project Site in patrol vehicles. Currently, deputies patrol on foot in the unincorporated portions of the Project Site. The County Sheriff's Department has indicated that the time that it takes to respond to the centrally located portions of the Project Site would result in an increase in emergency response times. This is considered a potentially significant impact.

As mentioned above, the County Sheriff's Department does not maintain statistical data on the non-residential population of the West Hollywood Sheriff's Station's service area. Although the proposed Project would not result in additional residents in the West Hollywood Sheriff's Station service area, the County Sheriff's Department has indicated that the increase in on-site jobs would generate additional demand on the County Sheriff's Department.³⁶⁴ Although the County Sheriff's Department did not express concern over impacts resulting from additional traffic associated with the proposed Project, traffic impacts would be similar to those discussed above with regard to the City Police Department.

As discussed above, the proposed Project would include design features to incrementally reduce the increase in impacts to sheriff services. These design features may include an on-site security force, illuminating parking lots with artificial lighting, and an extensive use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. Further, emergency access to the Project Site would be provided by the existing and proposed on-site street systems. Implementation of the Project would result in an increase in the number of on-site security personnel commensurate with development levels within the Studio, Business, and Entertainment Areas, which based on historic trends, would provide adequate security levels. In addition, given that there is no evidence of a relationship between on-site crime incidents and crime within the adjacent residential neighborhoods, it is concluded that on-site growth would not increase off-site crime.

With regards to the sale of alcoholic beverages, the proposed County Specific Plan would provide regulations governing the sale of alcoholic beverages in the County portions of the Entertainment, Studio and Business Areas. In particular, the proposed County Specific Plan would provide operational conditions, such as hours of operation,

³⁶⁴ Population is the sum of the existing population (38,273) in the West Hollywood Sheriff's Station service area obtained from the 2007 Crime and Arrests Statistics Report for the West Hollywood Sheriff's Station, available at <http://www.lasd.org/sites/yir9600/yir2007/contents.htm>, accessed June 3, 2008, and the total employment that would be added to unincorporated Los Angeles County as a result of the proposed Project.

requirements for employee training, seating provisions, security features, and consultation with the County Sheriff's Department. These Specific Plan features would provide an adequate approach for minimizing security issues related to the sale of alcoholic beverages. The proposed County Specific Plan would permit the addition of 15 new establishments for the service of alcoholic beverages. While the proposed County Specific Plan would increase the number of establishments selling alcoholic beverages over existing conditions, this increase is included in the analysis of the Project's potential impacts to County Sheriff services.

It should also be noted that the proposed Project would generate revenues to the County which could be applied to the provision of sheriff facilities and/or related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the appropriate decision makers. Since it cannot be guaranteed the proposed Project's revenue contributions would be applied to sheriff services, it is conservatively concluded that the proposed Project's demands would result in a reduction in the service ratio, and thus, impacts prior to mitigation could potentially be significant.

Mitigation measures have been included below to assure that the proposed Project addresses these issues in a manner that would help to limit the increase in demand on County Sheriff's Department services.

(3) Impacts Under the No Annexation Scenario³⁶⁵

(a) City of Los Angeles Police Department Facilities

Under the No Annexation scenario, the population increase in the City of Los Angeles would be less than under the proposed Project. Under the No Annexation scenario, it is estimated that 1,178 of the Project's 2,937 proposed residential units would be located within the City of Los Angeles and would therefore increase the residential

³⁶⁵ *Under existing jurisdictional boundaries the area designated in the proposed City Specific Plan as Planning Subarea 10 is located partly in the City of Los Angeles and partly in unincorporated County of Los Angeles. For purposes of the "No Annexation" analysis it was assumed that the 250,000 square feet of studio office proposed in Planning Subarea 10 would not be split between the two jurisdictions and was assumed for the analysis to be within the City. In the event that the proposed annexation does not occur as proposed and Planning Subarea 10 is instead within the unincorporated County portion of the Project Site, the additional development that would occur in the County would not result in impacts greater than those identified in this analysis.*

population within the North Hollywood Community Police Station service area by approximately 2,580 residents.³⁶⁶

As discussed above, the City Police Department has indicated that the existing North Hollywood Community Police Station is operating at more than full capacity and that there is a need to add square footage to the existing facility to ease overcrowding. As is the case with the proposed Project, the impacts of the Project under the No Annexation scenario would be mostly traffic related and affect Barham Boulevard, Lankershim Boulevard, Universal Hollywood Drive, and the 101 and 170 Freeways. Also, the City Police Department has indicated that the principal types of crimes associated with the new residential and commercial development would be property crimes (particularly robberies, burglary, and burglaries from motor vehicles) and therefore, would result in an increase in demand for police services. This could be a potentially significant impact.

Potential traffic impacts to City Police Department services would be similar to those under the proposed Project, and would be less than significant. In addition, impacts related to the sale of alcoholic beverages would also be similar to those under the proposed Project and also less than significant.

The residential population increase in the North Hollywood Community Police Station service area under the No Annexation scenario would generate the need for three (3) new officers in the City of Los Angeles (2,580 additional residents/1,000 x 0.995 = 2.6). If the new officers were not provided, the ratio would fall from 0.995 officers per 1,000 residents to 0.994 officers per 1,000 residents (247 sworn officers / [248,580 total residential population/1,000]).³⁶⁷ This level of increased demand for City Police Department services would be less than the demand forecasted to occur under the proposed Project. Similar to the proposed Project, the City Police Department has indicated that the non-residential development under the No Annexation scenario would increase the demand for City Police Department services. As with the proposed Project, it is anticipated that a reorganization of the North Hollywood Community Police Station's Basic Car Areas and the provision of personnel to ensure that the Basic Car Areas are fully staffed would be required under the No Annexation scenario. As discussed above, the City Police Department has indicated that the provision of desk space for two officers within a

³⁶⁶ For additional information, see Section IV.N.1, *Employment*, of this Draft EIR.

³⁶⁷ Derived from the existing population of the North Hollywood Community Police Station (246,000) identified in the LAPD public service response letter with the total population from the Project in the City added to this number.

community serving facility in the Mixed-Use Residential, as proposed in Mitigation Measure K.2-1, would enable the City Police Department to ensure adequate police services and would be sufficient to support the reorganization of the North Hollywood Community Police Station's Basic Car Areas.

As discussed above, the proposed Project would include design features to incrementally reduce the increase in impacts to police services. These design features, which would also be included under the No Annexation scenario, may include an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. Further, emergency access to the Project Site would be provided by the existing and proposed on-site street systems. City review of street widths, street lighting, and street signage would be based on an evaluation of requirements for the provision of emergency access, and would ensure access is maintained. Implementation of the Project under the No Annexation scenario would result in an increase in the number of on-site security personnel commensurate with development levels within the Studio, Business, and Entertainment Areas, which based on historic trends, would provide adequate security levels. In addition, given that there is no evidence of a relationship between on-site crime incidents and crime within the adjacent residential neighborhoods, it is concluded that on-site growth would not increase off-site crime.

Similar to the proposed Project, the development under the No Annexation scenario would generate revenues to the City which could be applied to the provision of police facilities and/or related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the appropriate decision makers. Since it cannot be guaranteed the Project's revenue contributions under the No Annexation scenario would be applied to police services, it is conservatively concluded that the demands under the No Annexation scenario would result in a reduction in the service ratio, and thus, impacts prior to mitigation could potentially be significant.

Mitigation measures have been included below to assure that the No Annexation scenario has addressed these issues in a manner that would limit the increase in demand on City Police Department services.

(b) County of Los Angeles Sheriff's Department Facilities

Under the No Annexation scenario, the population increase within the unincorporated portions of the Project would increase to a greater extent than under the proposed Project. Under the No Annexation scenario, 1,759 of the 2,937 proposed

residential units would be located within unincorporated portions of the County of Los Angeles, and would therefore increase the residential service population within the West Hollywood Sheriff's Station by 3,870 residents.³⁶⁸

As discussed above, the County Sheriff's Department has indicated that the West Hollywood Sheriff's Station is already operating above capacity. Specifically, a recent County Sheriff's Department survey suggests the need for an additional 33,000 square feet to meet current staffing levels. The County Sheriff's Department has also indicated that the Project would place an additional burden upon the station's personnel and resources. Specifically, under the No Annexation scenario, existing staffing would be increased to add additional sergeants, deputies, and support staff. The County's Sheriff's Department has indicated that the full staffing model under the No Annexation scenario would be: one lieutenant, four sergeants, one team leader, one detective, 23 deputies, four custody assistants, two professional administrative staff, and three law enforcement technicians.³⁶⁹ A portion of the required deputies would be needed to respond to the new County portions of the Project Site in patrol vehicles. Currently, deputies patrol by foot in the unincorporated portions of the Project Site. The County Sheriff's Department has indicated that the time that it takes to respond to the centrally located portions of the Project Site and respond to the Project Site would increase the emergency response times for the County Sheriff's Department under the No Annexation scenario. This is considered a potentially significant impact.

Potential traffic impacts to County Sheriff's Department services under the No Annexation scenario would be similar to those under the proposed Project, and would be less than significant with the addition of officers. In addition, impacts related to the sale of alcoholic beverages under the No Annexation scenario would also be similar to those under the proposed Project, and as such, would also be less than significant.

The increased residential population in unincorporated portions of the Project Site under the No Annexation scenario would be added to the West Hollywood Sheriff's Station Area and anticipated to result in the greater need for services by the County Sheriff's Department. This increase in residents would generate the need for six (6) new officers in the County of Los Angeles ($3,870 \text{ new residents in the County of Los Angeles} / 1,000 \times 1.57 = 6.1$) to maintain existing officer-to-resident ratios. If the new officers were not provided,

³⁶⁸ See Section IV.N.1, *Employment*, of this Draft EIR.

³⁶⁹ Written correspondence from Leroy D. Baca, County of Los Angeles Sheriff's Department, dated February 11, 2010.

the ratio would fall from 1.57 officers per 1,000 residents to 1.32 officers per 1,000 residents (60 sworn officers / [42,143 total residential population/1,000]). Additionally, although the County Sheriff's Department does not maintain statistical data on the non-residential population in the West Hollywood Sheriff's Station service area, the County Sheriff's Department has indicated that the non-residential development under the proposed Project would increase the demand for County Sheriff's Department services.

As discussed above, the proposed Project would include design features to incrementally reduce the increase in impacts to the County Sheriff's Department. These design features, which would also be included under the No Annexation scenario, may include an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. Further, emergency access to the Project Site would be provided by the existing and proposed on-site street systems. Implementation of the Project under the No Annexation scenario would result in an increase in the number of on-site security personnel commensurate with development levels within the Studio, Business, and Entertainment Areas, which based on historic trends, would provide adequate security levels. In addition, given that there is no evidence of a relationship between on-site crime incidents and crime within the adjacent residential neighborhoods, it is concluded that on-site growth would not increase off-site crime.

Similar to the proposed Project, the No Annexation scenario would generate revenue to the County which could be applied to the provision of sheriff facilities and/or related staffing. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the appropriate decision makers. Since it cannot be guaranteed the Project's revenue contributions under the No Annexation scenario would be applied to sheriff services, it is conservatively concluded that the demands under the No Annexation scenario would result in a reduction in the service ratio, and thus, impacts prior to mitigation could potentially be significant.

Mitigation measures have been included below to assure that the No Annexation scenario has addressed these issues in a manner that would help to limit the increase in demand on County Sheriff's Department services.

4. Cumulative Impacts

In order to assess cumulative impacts to City Police Department and County Sheriff's Department services, an analysis based on future population projections for the City Police Department and County Sheriff's Department service areas was performed.

For the purpose of the Project's population modeling and analysis, population projections have been broken down into the City Police Department and County Sheriff's Department service areas that are used by the departments for measuring performance.

a. Cumulative Proposed Project Impacts

(1) City of Los Angeles Police Department

As noted above, the City Police Department has indicated that the North Hollywood Community Police Station does not currently meet the demands of citizens within its service area. As the population continues to grow in the surrounding area, increased demand will further exacerbate this deficiency.

Based on the cumulative analysis performed for the Project, an additional 18,937 off-site residents would be added within the North Hollywood Community Police Station service area between 2010 and 2030, the year of Project buildout. This would result in a total residential population in the North Hollywood Police Station service area of 264,937 residents. To maintain the existing officer-to-resident ratio of 0.995 officers to 1,000 residents, an additional 19 sworn officers would need to be added to the North Hollywood Police Community Police Station ($18,937 \text{ additional residents} / 1,000 \times 0.995 = 18.8$). Provided that the existing staffing levels (2008) were to remain constant, the officer-to-resident ratio would fall to 0.847 to 1,000 ($247 \text{ sworn officers} / [291,596 \text{ total population} / 1,000]$). This would be below the existing ratio of 0.995 to 1,000. Further, an additional 9,654 off-site employees are anticipated to be added to the North Hollywood Community Police Station service area during the same time period. Although the City Police Department does not maintain statistical data on the non-residential population of the North Hollywood Community Police Station service area, the City Police Department has indicated that non-residential development increases the demand for City Police Department services.

Therefore, it is conservatively assumed for purposes of this analysis that an expansion of facilities or the construction of a new facility may be required to accommodate additional staff for the North Hollywood Community Police Station service area. Some of the increased demand for police protection services would be met through security features designed into future projects, and individual project review by both the City Planning Department and the City Police Department. In addition, similar to the proposed Project, the identified cumulative off-site growth would generate revenues to the City which could be applied to the provision of police facilities and/or related staffing. However, as Project buildout would not be completed until 2030, future funding decisions are uncertain; therefore, it is conservatively concluded that the increase in demand from the identified

cumulative off-site growth may result in a reduction in the service ratio, and thus, impacts from cumulative off-site growth prior to mitigation could potentially be significant.

However, mitigation measures have been included to address the Project's increase in demand on City Police Department police services. Thus, with the implementation of these mitigation measures, the proposed Project's cumulative impacts would be reduced to a less than significant level.

(2) County of Los Angeles Sheriff's Department

As noted above, the County Sheriff's Department has indicated that the West Hollywood Sheriff's Station does not currently meet the demands of the area population. As the population continues to grow in the surrounding area, increased demand will further exacerbate this deficiency.

Based on the cumulative analysis performed for the Project, an additional 1,292 off-site residents would be added within the West Hollywood Sheriff's Station service area between 2010 and 2030, the year of Project buildout. This would result in a total residential population of 47,221 residents in the service area. To maintain the existing officer-to-resident ratio of 1.57 to 1,000, an additional two (2) sworn officers would need to be added to the West Hollywood Sheriff's Station (1,292 additional residents in the County of Los Angeles/1,000 x 1.57 = 2.0). Provided that the existing staffing levels (2008) were to remain constant, the officer-to-resident ratio would be reduced to 1.27 to 1,000 (60 sworn officers / [47,221 total population/1,000] = 1.27). This would be below the existing ratio of 1.57 officers to 1,000 persons. Additionally, approximately 3,828 employees would be added to the West Hollywood Sheriff's Station service area by the proposed Project. Although the County Sheriff's Department does not maintain statistical data on the non-residential population of the West Hollywood Sheriff's Station service area, the County Sheriff's Department has indicated that non-residential development increases the demand for County Sheriff's Department services.

Therefore, it is conservatively assumed for purposes of this analysis that an expansion of facilities or the construction of a new facility may be required to accommodate additional staff for the West Hollywood Sheriff's Station service area. Some of the increased demand for services by the County Sheriff's Department would be met through security features designed into future cumulative projects, and individual project review. In addition, as discussed above, the identified growth would generate revenues to the County which could be applied to the provision of sheriff facilities and/or related staffing. However, as Project buildout would not be completed until 2030, future funding decisions are uncertain; therefore it is conservatively concluded that the increase in demand from the

identified growth may result in a reduction in the service ratio, and thus, cumulative impacts prior to mitigation could potentially be significant.

However, mitigation measures have been included to address the Project's increase in demand on County Sheriff's Department services. Thus, with the implementation of these mitigation measures, the proposed Project's cumulative impacts would be reduced to a less than significant level.

b. Cumulative Impacts Under the No Annexation Scenario

As noted above, the City Police Department and County Sheriff's Department have indicated that the North Hollywood Police Station and West Hollywood Sheriff's Station, respectively, do not currently meet the demands of citizens within their service areas. The cumulative population growth—including growth resulting from the Project—in the service areas under the No Annexation scenario may lower the existing officer-to-resident ratios (albeit to a lesser extent than the proposed Project with annexation in the City Police Department service area and to a greater extent in the County Sheriff's Department service area).

Therefore, it is conservatively assumed for purposes of this analysis that as with cumulative growth under the proposed Project, an expansion of facilities or the construction of a new facility may be required to accommodate additional staff for the North Hollywood Police Station and West Hollywood Sheriff's Station service areas. Some of the increased demand for police/sheriff services would be met through security features designed into future projects, and plan review. In addition, similar to the analysis presented above, the cumulative No Annexation scenario would generate revenues which could be applied to the provision of City Police Department and County Sheriff's Department facilities and/or related staffing, although to a lesser degree. However, as Project buildout would not be completed until 2030, future funding decisions are uncertain; therefore, it is conservatively concluded that the increase in demand from the identified growth may result in a reduction in the service ratio, and thus, impacts from cumulative off-site growth under the No Annexation scenario could potentially be significant.

However, mitigation measures have been included to assure that the Project has addressed its increase in demand on City Police Department and County Sheriff's Department services. Thus, with the implementation of these mitigation measures, the No Annexation scenario's cumulative impacts would be reduced to a less than significant level.

5. Project Design Features and Mitigation Measures

a. Project Design Features

Provided below are those project design features that shall be implemented to address Project impacts on police/sheriff services and facilities. In addition to the Project Design Features listed below, the Applicant shall prepare, and implement, a Construction Management Plan, which would outline measures to ensure emergency vehicle access during all aspects of Project construction, including, but not limited to, the use of flagmen during partial street closures on streets surrounding the Project Site to facilitate traffic flow until construction is complete. Please refer to Section IV.B.1, Traffic/Circulation, of this Draft EIR for additional information regarding the Project's Construction Management Plan.

Project Design Feature K.2-1: During Project construction, the Applicant or its successor shall implement security measures at Project construction sites that are accessible to the general public. Security measures could include, but are not limited to, fencing, security lighting, and providing security personnel to patrol construction sites.

Project Design Feature K.2-2: During Project design for buildings in the City, the Applicant or its successor shall incorporate project design features consistent with the City Police Department's Design Out Crime Guidelines, which may include providing an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting.

Project Design Feature K.2-3: The Applicant or its successor shall design on-site streets, street lighting, and street signage in accordance with the emergency access requirements of the applicable jurisdiction (i.e., City of Los Angeles or County of Los Angeles). The Applicant or its successor shall submit to the applicable jurisdiction (i.e., City or County) for review the design plans for on-site street widths, street lighting, and street signage.

b. Mitigation Measures

The following mitigation measures would address impacts on police/sheriff service level and facilities, as well as issues pertaining to crime prevention:

Mitigation Measure K.2-1: No later than six months following the issuance of a certificate of occupancy for the first 5,000 square feet of community serving facilities (excluding square footage associated with public services) in the Mixed-Use Residential Area, the Applicant or its successor shall provide to the City of Los Angeles Police Department at no rent the non-exclusive use of desk space for two officers within a community serving facility in the Mixed-Use Residential Area.

Mitigation Measure K.2-2: The Applicant or its successor shall provide a new up to 16,000 square foot facility within the County portion of the Project Site, for the shared use of the County Sheriff's Department, contract security, and corporate security for the Project Site. Construction of the facility shall meet the operational needs of the County Sheriff's Department and comply with applicable California Code of Regulations Title 15 requirements and County standards. The facility shall include holding cells, office space, locker room, and several access points. The Applicant or its successor shall improve the facility at its cost. The facility shall be available once certificates of occupancy have been issued for a cumulative total of 765,000 square feet of net new Project development within County portions of the Project Site or 2022, whichever comes first, and once constructed shall replace the existing on-site County Sheriff's Department facility.

Mitigation Measure K.2-3: Extra private security personnel shall be deployed at important entertainment events, in order to reduce the need for sworn officer response.

Mitigation Measure K.2-4: Prior to the issuance of each building permit within the Mixed-Use Residential Area, the Applicant or its successor shall incorporate crime prevention features appropriate to the operational characteristics of the individual building. These features may include the following elements:

- Well illuminated and designed entryways with minimum dead space to eliminate areas of concealment;
- Ornamental shrubbery not planted in a way that would provide cover for persons tampering with doors or windows;
- For residential development, installing doors with hinges on the inside or in a manner which prohibits pin removal or tampering, where feasible and effective;

- The incorporation of access for emergency service personnel and vehicles;
- For residential development, video cameras and private security guards may be used to monitor and patrol the Project Site during Project construction and operation; and
- Entryways, elevators, lobbies, and parking areas with lighting that eliminates areas of concealment; and solid core doors with deadbolt locks to all offices and shops.

Mitigation Measure K.2-5: Prior to the issuance of the first building permit issued in the Mixed-Use Residential Area portion of the Project Site, the Applicant or its successor shall consult with the City Police Department regarding site-wide crime prevention features, which may include: provision of call boxes in parks and/or other strategic locations for police and medical emergencies; payphones restricted to outgoing calls only; and “graffiti” cameras in strategic locations to discourage problem graffiti areas from arising. In the event that the proposed annexation/detachment does not occur, this mitigation shall be extended to the County Sheriff’s Department for those portions of the Mixed-Use Residential that remain under the jurisdiction of the County of Los Angeles.

6. Level of Significance After Mitigation

Development under both the proposed Project and No Annexation scenario would result in the need for increased staffing for existing facilities and to maintain the City Police Department and County Sheriff’s Department’s protection service ratios. In addition to the new tax revenues from development of the proposed Project that could be used for the funding of expansion of the police/sheriff services and facilities, the Applicant would provide resources and improvements through the implementation of the recommended mitigation measures, which would reduce impacts to less than significant levels.