

IV. Environmental Impact Analysis

J.2 Public Services—Police Protection

1. Introduction

This section describes existing police protection services within the Project area and provides an analysis of the Project's potential impacts on these services. As a County regional park, the County of Los Angeles Sheriff's Department (LASD) Parks Bureau provides primary police protection services to the Project Site. In addition, as the Project Site is located within the City of Los Angeles, the City of Los Angeles Police Department (LAPD) also provides police protection services to the Project Site. The analysis provided herein focuses on the LASD and LAPD facilities that serve the Project Site and the ability of those agencies to provide adequate police protection services to serve the Project. The analysis is based on information provided by the LASD and the LAPD, which is included in Appendix K of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) County of Los Angeles

(a) Los Angeles County General Plan

The Safety Element of the General Plan, adopted in 1980, does not include any policies specifically pertaining to sheriff protection, but rather addresses public services in general. In addition, the Safety Element includes a number of policies addressing emergency response, preparedness, and recovery. The Safety Element identifies the LASD as one of several agencies responsible for disaster planning programs.

(b) Los Angeles County Code

Law enforcement regulations and the powers and duties of the Sheriff's Department are outlined in Chapter 2.34 of the Los Angeles County Code.

(2) City of Los Angeles

(a) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Presently, the LAPD operates under a Computer Statistics (COMPSTAT) Plus program that implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. The COMPSTAT system implements a multi-layer approach to police protection services through statistical and geographical information system analysis of growing trends in crime through its specialized crime control model. COMPSTAT Plus represents an enhanced application of the COMPSTAT principles of inspection and accountability, as well as the use of more in-depth auditing methods, mentorship, and close collaboration.¹

(b) City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter Article V, Section 570; the City of Los Angeles Administrative Code, Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC), Chapter 5, Article 2. Article V, Section 570 of the City Charter gives the power and the duty to the LAPD to enforce the penal provisions of the Charter and City ordinances, as well as State and Federal law. The Charter also gives responsibility to the officers of the LAPD to act as peace officers, as defined by State law, and the power and duty to protect lives and property in case of a disaster or public calamity.

(c) Design Out Crime Guidelines

The City of Los Angeles has recently implemented the “Design Out Crime” program, which uses the techniques of Crime Prevention Through Environmental Design (CPTED). The LAPD’s Crime Prevention Unit consults with private developers to incorporate CPTED techniques into projects, and the LAPD participates in the City’s Permit Processing Network, an inter-agency task force that reviews complex development projects. CPTED includes the following three key concepts:

¹ *City of Los Angeles Police Department, COMPSTAT Plus, www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 11, 2014.*

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

The LASD also promotes the implementation of CPTED.

b. Existing Conditions

(1) Los Angeles County Sheriff's Department

As a County park facility, the Project Site is located within the service area of the LASD's Parks Bureau, which provides law enforcement services to 177 County facilities (i.e., parks, lakes, golf courses, special event venues, etc.). Law enforcement services provided by the Parks Bureau are delivered by patrol deputies, a Special Problems Unit, Detective Bureau, a Lake Operations Unit, a Mounted Enforcement Detail, and an Off-Road Enforcement Detail. Parks Bureau personnel deploy various motor vehicles, non-motorized vehicles, watercraft, and specially-trained horses during routine patrol operations. In addition, special service teams maintained by LASD are available to the Parks Bureau on an as-need basis, including the Aero Bureau, Emergency Operations Bureau, Special Enforcement Bureau, Canine Services Bureau, and Mountain Rescue. The specially-trained groups are equipped to respond to various unique assignments including tactical planning, arson/explosives, hazardous materials, biological weapons, criminal terrorism, natural disasters, man-made catastrophes, and search and rescue operations. The Parks Bureau is currently staffed by 152 sworn deputies and 56 civilian employees.

The Parks Bureau is divided into three zones: North, South, and East. The Project Site is located within the South Zone (Parks Bureau South). The Parks Bureau South Zone generally extends as far north as the Hollywood Bowl and Ford Theatres, and is bounded by the coastline on the west, and County lines on the south and east. The Parks Bureau South Zone contains 38 parks, nine golf courses, and two specialty venues. Parks Bureau South offices are located at 12910 South Athens Way in the City of Los Angeles. The nearest Parks Bureau office is located at 2101 North Highland Avenue in Hollywood, approximately 0.5 miles south of the Project Site, as shown in Figure IV.J.2-1 on page IV.J.2-4. Currently, 32 deputies, 11 security officers, and two civilians are assigned to the Parks Bureau South Zone. Parks Bureau South provides law enforcement services to



Figure IV.J.2-1

Location of Police Protection Services Serving the Project Site



County parks within the South Zone and does not include any residential uses. As such, Parks Bureau South does not serve a residential population.

Parks Bureau South patrol deputies respond to incidents while on-site and, if necessary, may request assistance from additional Parks Bureau deputies via radio communication. In the event Parks Bureau South patrol deputies are not on-site when an incident occurs, emergency calls for service are received by either the Parks Bureau Dispatch Center or the LAPD. Calls received by the LAPD are forwarded to the Parks Bureau Dispatch Center and then dispatched to Parks Bureau South for response. Via an existing mutual aid agreement, LAPD can assist the LASD by providing additional resources to the Project Site in the event of an emergency. For large-scale emergencies, LASD is equipped to coordinate, manage, or support the emergent response of multi-jurisdictional personnel and equipment to assist all law enforcement agencies within and beyond the County. Within the Project Site, the County currently operates an alarm system which is monitored by the LASD. Security guards for events and overnight security shifts are currently contracted by LASD.

Within LASD's service area, smaller geographic units referred to as Reporting Districts are used to assist in compiling statistical data. The Project Site is located within LASD's Reporting District 8394. Table IV.J.2-1 on page IV.J.2-6 summarizes the most recent crime data for Reporting District 8394.

(2) Los Angeles Police Department

For the purposes of providing police protection services, the LAPD is divided into four bureaus: the Central, West, South, and Valley Bureaus. The four bureaus are further divided into 21 service areas and serviced by the LAPD's 21 community police stations.² 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.

The LAPD also includes a variety of support systems including the Direct Support Division, Special Operations, Municipal Division, Special Weapons and Tactics, K-9, and Mounted Units. All geographic divisions of the Department are fully and consistently staffed according to existing needs. The determination of staffing needs is predicated upon the analysis of crime data, population density, and other specific demographic variables. As of April 2014, the departmental staffing resources within the LAPD included 9,882

² *City of Los Angeles Police Department, Media Relations Handbook, 2007-2008.*

**Table IV.J.2-1
Reporting District 8394 Crime Data**

Year	Part I	Part II
2010	3	0
2011	0	1
2012	0	2
2013	1	2
2014 (to date)	0	0

^a Based on the Federal Bureau of Investigation Uniform Crime Reporting Program, Part I offenses include murder and non-negligent homicide, forcible rape, robbery, aggravated assault, burglary, motor vehicle theft, larceny-theft, and arson.

^b Based on the Federal Bureau of Investigation Uniform Crime Reporting Program, examples of Part II offenses include minor assault, forgery, fraud, vandalism, etc.

Source: Written correspondence from Holly M. Perez, Captain, Parks Bureau, Los Angeles County Sheriff's Department, March 20, 2014.

sworn-in officers. Based on a total City population of 3,792,621, the LAPD currently has an officer to population ratio of 2.61 officers for every 1,000 residents.³

The Project Site is located in the West Bureau service area, which covers a territory of approximately 124 square miles with a population of 840,000 residents.⁴ 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 Boulevard, to the south by El Segundo Boulevard, and to the west by the Pacific Ocean.⁵

Within the West Bureau Service Area, the Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, approximately 1.5 miles south of

³ City of Los Angeles Police Department, *COMPSTAT Citywide Profile 03/09/14 – 04/05/14*, www.lapdonline.org/assets/pdf/cityprof.pdf, accessed April 11, 2014.

⁴ City of Los Angeles Police Department, *About West Bureau*, www.lapdonline.org/west_bureau/content_basic_view/1869, accessed March 20, 2014.

⁵ *Ibid.*

the Project Site, as shown in Figure IV.J.2-1 on page IV.J.2-4. The Hollywood Community Police Station service area covers approximately 13.34 square miles with general service boundaries of Mulholland Drive and Griffith Park boundary to the north, the Los Angeles City boundary and Melrose Avenue to the south, Normandie Avenue and Griffith Park boundary to the east, and the City of Los Angeles City boundary to the west. There are approximately 354 sworn officers and 16 civilian support staff deployed within the Hollywood Community Police Station service area.⁶ Based on the residential service population of approximately 128,418 persons within the LAPD's Hollywood Community service area, the officer to resident ratio is approximately 2.76 officers per 1,000 residents. Thus, the officer to resident ratio is somewhat higher than the citywide ratio of 2.61 officers per 1,000 residents.

The Project Site is located within Reporting District 615 of the Hollywood Community Police Station service area boundaries. The general service boundaries of Reporting District 615 are North Hollywood to the north, Hollywood Freeway to the south, Barham Boulevard to the west, and Montlake and LedgeWood Drive to the east. A comparison of the Hollywood Community Police Station service area and citywide data regarding crimes is provided in Table IV.J.2-2 on page IV.J.2-8. As shown therein, in 2013, there were approximately 65 crimes per 1,000 residents in the Hollywood area and approximately 50 crimes per 1,000 residents citywide.

Table IV.J.2-3 on page IV.J.2-9 provides a breakdown of the 2013 crime statistics for Reporting District 615, the Hollywood Community Police Station service area, and citywide. In 2013, Reporting District 615 reported 94 crimes, the Hollywood Community Police Station service area reported 8,309 crimes, and 187,749 crimes were reported citywide. Based on the number of officers deployed within the Hollywood Community Police Station service area, the crimes per officer ratio in 2013 was approximately 23.5 crimes per officer in comparison to the citywide ratio of 19.0 crimes per officer. Although the Hollywood Community Police Station service area had more crimes per officer compared to the citywide ratio, the average response time to emergency calls for service in the Hollywood Community Police Station service area during 2013 was 5.0 minutes as compared with the citywide average of 5.9 minutes.⁷

⁶ *Written correspondence from Andrew J. Smith, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department April 10, 2014. See Appendix K of this Draft EIR.*

⁷ *Written correspondence from Leonid A. Tsap, Officer, Community Relations Section, Crime Prevention Unit, Los Angeles Police Department, April 10, 2014. See Appendix K of this Draft EIR.*

**Table IV.J.2-2
2013 Crimes per 1,000 Persons within Hollywood and Citywide**

	Crimes	Population	Crimes per 1,000 Persons
Hollywood Service Area	8,309	128,418	65
Citywide	187,749	3,790,185	50
<hr/> <p><i>Source: Written correspondence from Leonid A. Tsap, Officer, Community Relations Section, Crime Prevention Unit, Los Angeles Police Department, April 10, 2014.</i></p>			

3. Project Impacts

a. Methodology

Potential impacts on police protection services were evaluated based on the ability of existing and planned LASD and LAPD staffing, equipment, and facilities to meet the additional demand for police protection services potentially associated with implementation of the Project. The following factors were taken into consideration in performing the impact analysis: the effects of the Project on calls for service, levels of service, and response times; and the need for additional deputies and police officers, associated equipment, and facility space. The analysis also considers the ability of the Project's planned security features to reduce demands on police protection services.

b. Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, Project impacts with regard to police protection would be significant if the Project would:

- 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 services.

c. Project Design Features

The following specific project design features would be included as part of the Project:

**Table IV.J.2-3
Los Angeles Police Department 2013 Crime Data**

Types of Crime	Reporting District 615	Hollywood Area	Citywide
Murder	0	7	251
Rape	0	50	665
Robbery	1	380	7,861
Aggravated Assault	0	295	7,592
Burglary	13	373	15,572
Larceny	43	2,863	55,120
Vehicle Theft	8	420	14,112
Other Assault	7	1,519	30,818
Forgery/ Counterfeit	0	98	2,683
Fraud	9	586	12,788
Embezzlement	0	13	726
Vandalism	11	815	17,971
Weapon	0	51	1,135
Pimping/Pandering	0	4	66
Other Sex Offense	0	99	2,833
Against Family Children	0	16	515
Disorderly Conduct	0	18	345
Vagrancy	0	172	1,677
All Other Violations	2	530	15,019
TOTAL	94	8,309	187,749
<p><i>Source: Written correspondence from Leonid A. Tsap, Officer, Community Relations Section, Crime Prevention Unit, Los Angeles Police Department, April 10, 2014.</i></p>			

Project Design Feature J.2-1: During construction, the Applicant shall implement temporary security measures including, but not limited to, on-site security personnel, surveillance cameras, adequate lighting, and perimeter fencing around the construction area. Large mounds of dirt/debris/building materials and fence covers/screens shall be avoided. Equipment and building materials shall be removed or secured during non-construction hours.

Project Design Feature J.2-2: During operation, the Applicant shall implement security measures including, but not limited to:

- High-definition surveillance cameras. The cameras shall be placed along pedestrian pathways, gathering areas, and at driveways on Cahuenga Boulevard East. The camera system shall allow law enforcement agencies to view live feed remotely,

shall be equipped with a hard drive capable of storing video for 15 days, and shall be capable of transferring video to disc or USB storage devices.

- Configure proposed public restrooms such that entrances are oriented towards the main event area or other high-visibility areas. The restrooms shall be secured after hours to prevent vandalism, theft, and use by transients.
- Adequate lighting and high definition surveillance cameras within the parking structures. Points of entry and egress shall be equipped with traffic control devices, and a parking lot attendant shall be employed during events.
- Signage along the hiking trail advising users that the trail is closed at night and that camping and smoking are strictly prohibited. The trail shall also be well-marked to prevent users from getting lost and the brush next to the trail shall be cut short to prevent people from hiding or concealing illicit materials. Restrooms, drinking fountains, and picnic/rest areas shall not be built along the trail.

Project Design Feature J.2-3: Upon completion of the Project, the Applicant shall provide the Los Angeles Police Department Hollywood Area commanding officer with a diagram of each portion of the property. The diagram shall include access routes and additional information that might facilitate police response.

d. Analysis of Project Impacts

(1) Construction

Construction sites can be sources of nuisances and hazards, inviting theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature J.2-1 above, in consultation with the LASD Parks Bureau, the Project Applicant would implement temporary security measures during construction, which could include on-site security personnel, surveillance cameras, adequate lighting, and perimeter fencing around the construction area. In addition, equipment and building materials would be removed or secured during non-construction hours. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Additionally, Project-related construction activities within the surrounding roadways could potentially impact the provision of LASD and LAPD police protection services in the

vicinity of the Project Site. Emergency access for LASD and LAPD vehicles within the Project Site and the surrounding vicinity could also be impacted by Project construction activities due to temporary lane closures, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. As a result, Project-related construction activities could increase the response time for police vehicles due to travel time delays caused by traffic along Cahuenga Boulevard East and main connectors. It is noted however that the construction-related traffic generated by the Project would not significantly impact LASD or LAPD response times within the Project vicinity since the drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. In addition, as discussed in detail in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, most, if not all, of the construction worker and haul truck trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, pursuant to Project Design Feature K-1, the Project would implement a Construction Management Plan during Project construction, wherein traffic management personnel and appropriate signage would be employed as necessary to ensure adequate and safe access to the Project Site and vicinity is maintained. As described in detail in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, features of the Construction Management Plan may include prohibition of construction worker parking on adjacent residential streets, scheduling construction activities to reduce the effect on traffic flow, and provisions to accommodate the equipment storage and truck staging on-site.

With implementation of the project design features, including the Construction Management Plan, construction of the Project would not generate a demand for additional police protection services that would substantially exceed the capability of the LASD and LAPD to serve the Project Site and result in the need for new police protection facilities. Therefore, impacts on police protection services during Project construction would be less than significant.

(2) Operation

The Project does not include the development of any residential uses and, as such, would not increase the permanent residential population within the service area of the Parks Bureau South Zone or the Hollywood Community Police Station. However, the Project would generate a daytime population associated with employees and users of the hiking trail and restaurant as well as an increase in the population associated with events. As described in Section II, Project Description, of this Draft EIR, to accommodate the increase in programming, it is anticipated that existing staffing within the Project Site would increase from approximately 20 employees to up to 105 employees or an increase of

approximately 85 employees. While the relocation of the existing 140 Los Angeles Philharmonic employees would result in an overall net decrease of employees on-site, the Project would result in an estimated 100 people associated with the hiking trail and approximately 75 people who would visit the restaurant on a daily basis.⁸ In addition, the Project would generate a net increase of 311 seats. As such, the Project's daytime and event population could increase the demand for police protection services.

As described above, the County currently operates an alarm system which is monitored by the LASD. In addition, security guards for events and overnight security shifts are currently contracted by the LASD. In consultation with LASD, these existing security and safety features would be continued and enhanced pursuant to Project Design Feature J.2-2, above. According to the LASD, implementation of the features set forth in Project Design Feature J.2-2 would serve to reduce the potential for criminal activities and assist law enforcement efforts.⁹ In addition, based on a preliminary review of the proposed improvements, the LAPD indicated that the Project, due to its size, would have a minimal impact on police services provided by the Hollywood Community Police Station.¹⁰ The LAPD has also indicated that upon completion of the Project, the Applicant shall provide the LAPD Hollywood area commanding office with a diagram of each portion of the property, including access routes. Implementation of this feature provided above in Project Design Feature J.2-3 would facilitate LAPD response. Therefore, the Project would not result in a demand for additional services that would exceed the capability of the LASD or the LAPD to serve the Project Site and impacts would be less than significant.

With respect to emergency access to the Project Site during Project operations, the analysis provided in Section IV.K, Traffic, Access, and Parking, of this Draft EIR demonstrates that Project development would result in a less than significant impact on access and local traffic conditions (i.e., nearby intersections). Although additional traffic generated by the Project could potentially cause delays in law enforcement response times, the additional traffic would not significantly impact emergency vehicle access or response times for either the LASD or LAPD.

Based on the above, with implementation of the project design features, Project operation would not generate a demand for additional police protection services that would

⁸ *Community Arts Resources Inc. The Ford, Transformed, Realizing the Potential of Ford Theatres County Regional Park, October 2012. Refer to Appendix K of this Draft EIR.*

⁹ *Written correspondence from Captain Holly M. Perez, County of Los Angeles Sheriff's Department, Parks Bureau, March 20, 2014. Refer to Appendix K of this Draft EIR.*

¹⁰ *Written correspondence from Andrew J. Smith, Commanding Officer, Los Angeles Police Department, April 10, 2014. Refer to Appendix K of this Draft EIR.*

substantially exceed the capability of the LASD and LAPD to serve the Project Site and result in the need for new police protection facilities. Therefore, impacts on police protection services provide during Project operation would be less than significant.

4. Cumulative Impacts

The geographic context for the cumulative impact analysis is the service area of the LASD's Parks Bureau South Zone and the LAPD's Hollywood Community Police Station. The Project in conjunction with identified related projects and forecasted growth through 2020 (i.e., the Project's buildout year) within these service areas would cumulatively increase the demand for police protection. Section III, Environmental Settings, of this Draft EIR identifies 27 related projects that are anticipated to be developed within the Project vicinity. All of the related projects identified fall within the service boundaries of the Hollywood Community Police Station service area. Notwithstanding, as previously described, the LASD's Parks Bureau provides law enforcement services to County facilities, including parks, lakes, golf courses, and special event venues. The related projects do not include the development of such uses. As such, the Project in combination with the related projects would not contribute to a cumulative increase in the demand for LASD Parks Bureau police protection services. Therefore, cumulative impacts on LASD Parks Bureau police protection services would be less than significant.

With regard to the LAPD, several of the related projects include residential uses, which would increase the permanent residential population within the Hollywood Community Police Station service area. In addition, the related projects would involve an increase in retail, restaurant, hotel, and office uses, which would increase the daytime population in the area. Along with other anticipated growth through 2020, this would further increase the demand for police protection services. The Project would not develop residential units, and thus would not generate a residential population. Therefore, the Project would not contribute to a cumulative increase in the residential service population of the Hollywood Community Police Station. In addition, as previously discussed, based on a review of the Project, the LAPD has indicated that the Project, due to its size, would have a minimal impact on police services provided by the Hollywood Community Police Station. Therefore, the Project's contribution to the cumulative demand for police protection services provided by the LAPD would not be cumulatively considerable. Additionally, as with the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting

efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Based on the above, the Project's contribution to cumulative impacts to police protection services would not be cumulatively considerable and, as such, cumulative impacts on police protection services would be less than significant.

5. Mitigation Measures

Project-level and cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

6. Conclusion

Project-level and cumulative impacts with regard to police protection services would be less than significant.