

IV. Environmental Impact Analysis

I.1 Public Services—Sheriff Protection

1. Introduction

This section of the Draft EIR describes the existing law enforcement services for the Project Site and surrounding area and provides an analysis of the proposed Project's potential impacts to these services. The focus of the analysis is on the Los Angeles County Sheriff's Department (LACSD) staffing and facilities that currently serve the Project Site and the ability of the LACSD to provide adequate police protection services to the proposed Project. The analysis is based, in part, on information provided by the LACSD, which is included in Appendix G of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.¹ This section of the CVC states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with

¹ A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

reasonable safety.... (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(2) Local

(a) West Hollywood General Plan 2035

The West Hollywood General Plan 2035 (General Plan) serves as a guiding document for the development of the City of West Hollywood (City) through 2035. The General Plan provides goals, policies, and guidelines to inform the management of physical, social, and economic resources in the City. The General Plan encompasses issues related to infrastructure, governance, land use, circulation, housing, conservation, open space, noise, social services, arts and culture, and safety. The Public Safety and Community Services Division of the City Manager's Office oversees crime prevention services and coordinates community, volunteer, and outreach programs. Specifically, this Division contracts with the LACSD to provide police and law enforcement services for the City from the West Hollywood Sheriff's Station.

The General Plan provides long term strategies to address the unique needs and characteristics of the City. The Police, Fire, and Emergency Services section of Chapter 10, Safety and Noise Element, of the General Plan describes specific goals and policies related to police protection services. While most of these goals and policies, such as those related to community engagement and the provision of sufficient law enforcement and resources, are citywide strategies to be implemented by the City and contract agencies, the policies relevant to the proposed Project include the following:

- SN-6.1: Provide sufficient law enforcement, fire protection, and emergency medical services to meet the needs of a changing population.
- SN-6.2: Cooperate and collaborate with neighboring jurisdictions, social services, and internal departments to maximize public safety and emergency services.
- SN-6.3: Continue to support the County's existing mutual aid and automatic aid agreements for additional fire and police resources needed during an emergency, as feasible.
- SN-7.1: As appropriate, utilize urban design features to enhance public safety, to facilitate "eyes on the street" and to create defensible space in project design. As appropriate, utilize best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape to achieve improved public safety in project design.

- SN-7.3: Provided that it serves the best interests of the community, continue to contract with Los Angeles County for the provision of police services and remain part of the Consolidated Fire Protection District of the County of Los Angeles for fire/emergency services, and annually review the services regarding the responsiveness to community needs, effectiveness, and efficient resource allocation.
- SN-7.5: As feasible, require new development to incorporate appropriate safety monitoring features.
- SN-8.1: Coordinate the provision of law enforcement and fire protection/emergency medical services with all public safety service providers monitoring their adequacy and responsiveness to community needs.

(b) West Hollywood Municipal Code

Chapter 1.20 of the West Hollywood Municipal Code (WHMC) pertains to contracts with Los Angeles County. This chapter of the WHMC states the following:

The City Council may contract with the County of Los Angeles pursuant to the laws of the State of California and the Charter of the County of Los Angeles, for the performance and execution by designated County officials of the rights, powers and duties of officers, officials and employees of the City of West Hollywood. Whenever in this code, whether set forth in full or by adoption by reference, any power or authority is granted to an officer, official or employee, such power or authority is conferred upon the appropriate officer, official or employee of the City of West Hollywood or the appropriate officer, official or employee of the County of Los Angeles whose service in behalf of the city is provided for by a contract with the County of Los Angeles.

In addition, pursuant to Section G-12.050 of Chapter G-12, Commercial and Public Use Design Guidelines, of the WHMC, design strategies incorporating safety should be based on the practice of Crime Prevention Through Environmental Design (CPTED). CPTED utilizes design and use of the built environment to provide opportunities for positive, constructive activities while minimizing opportunities for illegitimate or undesirable activities. CPTED is considered a measure for proactive and retrofit crime prevention planning to help reduce the incidence and fear of crime, and improve overall quality of life.²

² *West Hollywood Municipal Code, Chapter G-12, Commercial and Public Use Design Guidelines, Section G-12.020, Security.*

(c) Los Angeles County Sheriff's Department Manual of Policy and Procedures³

The Manual of Policy and Procedures is the official manual of the LACSD.⁴ The manual is a consolidation of existing orders and manuals that are departmental in scope. Volumes of the manual include, but are not limited to, LACSD policies and procedures regarding organization and functions, policy and ethics, case assignment and reporting, and line procedures. Chapter 6 of Volume 2 of the LACSD manual states the following:⁵

Divisional operations are carried out in the unincorporated areas of the County and within the geographical boundaries of those incorporated cities which contract with the County for law enforcement services. On request, the Patrol Divisions may provide law enforcement assistance to other incorporated cities in the County.

b. Existing Conditions

(1) Overview of LACSD Services

The LACSD serves a population of approximately 10 million people across an area of 4,084 square miles.⁶ The LACSD consists of approximately 20,000 employees and provides general law enforcement services to 40 contract cities (including the City of West Hollywood), 90 unincorporated communities, 216 facilities, hospitals, and clinics throughout the County, nine community colleges, 47 Superior Courts, and the Los Angeles County Metropolitan Transportation Authority (Metro). For the purposes of providing police protection services, the LACSD divides the City into four Patrol Divisions: North, Central, South, and East Patrol Divisions.⁷ These four patrol divisions are further divided into 23 service areas, which are serviced by the LACSD's 23 community sheriff stations.⁸ Based on the most recent data available, in 2016 these stations served approximately

³ Los Angeles County Sheriff's Department, Professional Standards Division, Manual of Policy and Procedures, <http://shq.lasdnews.net/shq/mpp/mpp.html>, accessed March 8, 2017.

⁴ Los Angeles County Sheriff's Department, Manual of Policy and Procedures, Introduction.

⁵ Los Angeles County Sheriff's Department, Manual of Policy and Procedures, Volume 2, Chapter 6, Jurisdiction.

⁶ Los Angeles County Sheriff's Department, About Us, www.la-sheriff.org/s2/page_render.aspx?pagename=org_about, accessed March 6, 2017.

⁷ Los Angeles County Sheriff's Department, Patrol, Overview of Patrol Stations, www.la-sheriff.org/s2/page_render.aspx?pagename=patrol_detail_01, accessed March 6, 2017.

⁸ Los Angeles County Sheriff's Department, Population and Geographic Data 2016, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/89.htm>, accessed May 11, 2017.

2,965,238 persons in incorporated and unincorporated areas. In addition, the LACSD departmental staffing resources included 10,975 sworn officers and 9,042 professional staff.⁹ As a result, in 2016, the LACSD had an officer-to-population ratio of approximately 3.70 officers for every 1,000 residents. The generally accepted officer-to-population ratio within the law enforcement industry is 1 officer per 1,000 residents. The LACSD also upholds the generally accepted response time of 10 minutes or less for emergency response incidents.¹⁰

The Project Site is located in the LACSD's North Patrol Division, which oversees law enforcement operations from Lancaster, Malibu/Lost Hills, Palmdale, Santa Clarita Valley and West Hollywood Stations. Based on the most recent data available from 2016, the departmental staffing resources within the LACSD North Patrol Division included 916 sworn officers and 254 professional staff. Based on a total service population of 807,948 persons, the LACSD North Patrol Division currently has an officer-to-population ratio of 1.13 officers for every 1,000 residents.¹¹

(2) LACSD West Hollywood Station

Within the LACSD North Patrol Division, the Project Site is served by the West Hollywood Station, located at 780 North San Vicente Boulevard, approximately 0.5 mile south of the Project Site. Figure IV.I.1-1 on page IV.I.1-6 shows the location of the LACSD West Hollywood Station in relation to the Project Site. The West Hollywood Station provides law enforcement services for the City and the unincorporated communities of Universal City, Hollywood Hills, and Sawtelle Veteran's Administration Center. The LACSD also has mutual aid agreements with the City of Los Angeles and the City of Beverly Hills Police Departments. The West Hollywood Station operates with units and programs related to patrols, traffic and signal safety, detective investigations, reserve forces, and volunteering. The West Hollywood Station also implements a special unit called the Community Oriented Policing and Problem Solving (COPPS) Team, which works in partnership with residents, community groups, city officials, and local businesses to combat crime and to improve quality of life for the people of West Hollywood.¹²

⁹ Los Angeles County Sheriff's Department, *Population and Geographic Data 2016*, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/89.htm>, accessed May 11, 2017.

¹⁰ Written correspondence from Tracy Jue, Director of the Facilities Planning Bureau, and Jim McDonnell, Sheriff, Los Angeles County Sheriff's Department, September 12, 2016. See Appendix G of this Draft EIR.

¹¹ Los Angeles County Sheriff's Department, *Population and Geographic Data 2016*, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/89.htm>, accessed May 11, 2017.

¹² Los Angeles County Sheriff's Department, *West Hollywood Station, Our Divisions, Special Units*, www.wehosherriff.com/, accessed March 7, 2017.

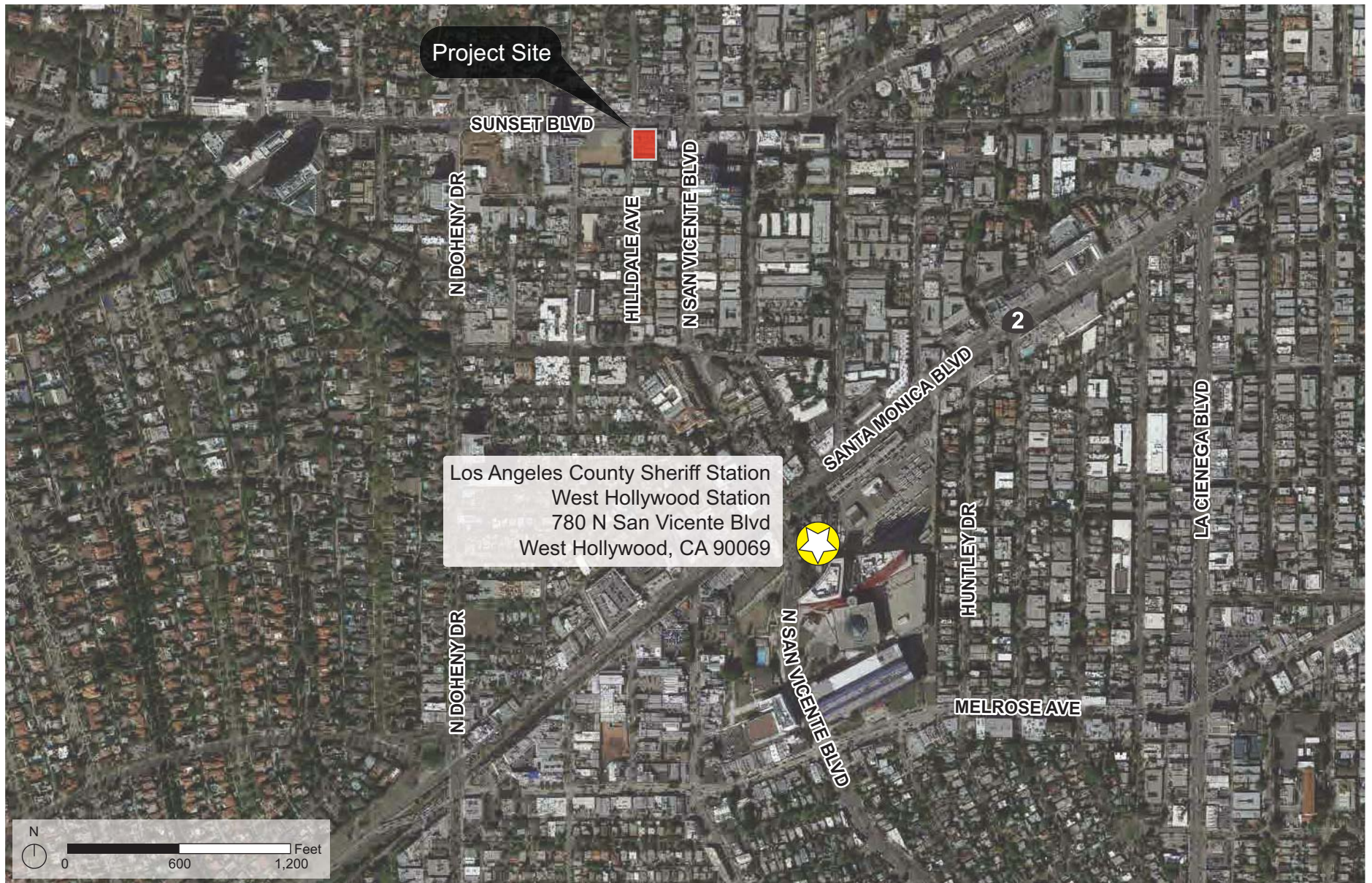


Figure IV.I.1-1
Sheriff Station Serving the Project Site

There are 141 sworn officers and 40 civilian employees currently deployed within the West Hollywood Station service area. Based on a service population of 36,474 persons, the officer-to-population ratio is approximately 3.87 officers per 1,000 residents.¹³ Thus, the officer-to-population ratio of 3.87 for the West Hollywood Station service area is substantially higher than the LACSD North Patrol Division service area ratio of 1.13 officers for every 1,000 residents and the entire LACSD service area ratio of 3.70 officer per residents.

(3) LACSD Crime Statistics

The crime rate, which is based on the number of crimes reported within a specified area with a given population, affects the “needs” projection for staff, facilities and equipment for the LACSD. Table IV.I.1-1 on page IV.I.1-8 provides a comparison of West Hollywood Station, North Patrol Division, and Los Angeles County Sheriff’s Department-wide service area data regarding Part I crimes in 2016, the most recent year in which data is available.¹⁴ As shown therein, based on the most recent data made available by the West Hollywood Station, a total of approximately 2,132 crimes were reported within the West Hollywood Station service area.¹⁵ Based on a service population of approximately 36,474 persons, approximately 58 crimes per 1,000 residents (0.058 crime per capita) were reported in the West Hollywood Station service area.

In comparison, the LACSD North Patrol Division experienced 17,315 crimes within its service area of approximately 807,948 persons.¹⁶ As a result, approximately 21 crimes per 1,000 residents (0.021 crime per capita) were reported in the LACSD North Patrol Division service area. As for the LACSD, approximately 77,362 crimes were reported within its entire service area of 2,965,238 persons. As a result, 26 crimes per 1,000 residents (0.026 crime per capita) were reported in the entire LACSD service area.¹⁷

¹³ Los Angeles County Sheriff’s Department, *Population and Geographic Data 2016*, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/89.htm>, accessed May 11, 2017.

¹⁴ Part I crimes include murder and non-negligent homicide, forcible rape, robbery, aggravated assault, burglary, motor vehicle theft, larceny-theft, and arson, U.S. Department of Justice Federal Bureau of Investigation, *Uniform Crime Reporting (UCR) Offense Definitions*, www.ucrdatatool.gov/offenses.cfm, accessed October 4, 2016.

¹⁵ Los Angeles County Sheriff’s Department, *West Hollywood Station, 2016 Synopsis*, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/whd/synopsis.htm>, accessed May 11, 2017.

¹⁶ Los Angeles County Sheriff’s Department, *North Patrol Division, 2016 Synopsis*, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/npd/synopsis.htm>, accessed May 11, 2017.

¹⁷ Los Angeles County Sheriff’s Department, *Department, 2016 Synopsis*, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/synopsis.htm>, accessed May 11, 2017.

**Table IV.I.1-1
2016 Part I Crimes per 1,000 Persons within the West Hollywood Station, North Patrol Division,
and LACSD Service Areas**

	Part I Crimes	Population	Part I Crimes per 1,000 Persons
West Hollywood Station ^a	2,132	36,474	58
LACSD North Patrol Division ^b	17,315	807,948	21
LACSD ^c	77,362	2,965,238	26

^a Los Angeles County Sheriff's Department, West Hollywood Station, 2016 Synopsis, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/whd/synopsis.htm>, accessed May 11, 2017.

^b Los Angeles County Sheriff's Department, North Patrol Division, 2016 Synopsis, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/npd/synopsis.htm>, accessed May 11, 2017.

^c Los Angeles County Sheriff's Department, Department, 2016 Synopsis, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/synopsis.htm>, accessed May 11, 2017.

Source: Los Angeles County Sheriff's Department, 2016 Crime and Arrest Statistics, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/index.html>, accessed May 11, 2017.

Table IV.I.1-2 on page IV.I.1-9 provides a breakdown of the Part I crime statistics for West Hollywood Station, LACSD North Patrol Division, and the entire LACSD service areas in 2016. As shown therein, based on the data made available by the West Hollywood Station, approximately 2,132 crimes were reported. Based on the number of sworn officers staffing the West Hollywood Station (141 sworn officers), the ratio of crimes per officer is 15.12 crimes per officer. In comparison, the LACSD North Patrol Division (916 sworn officers) has a ratio of 18.90 crimes per officer. Within the entire LACSD service area (10,975 sworn officers), the ratio is 7.05 crimes per officer.

As a result, the West Hollywood Station service area has a lower crime-per-officer ratio when compared to the LACSD North Patrol Division service area and a higher crime-per-officer ratio when compared to the entire LACSD service area. In addition, the West Hollywood Station's average response time for emergency calls for service was 3.1 minutes and well below the law enforcement industry's generally accepted response time of 10 minutes or less.¹⁸

¹⁸ Written correspondence from Tracy Jue, Director of the Facilities Planning Bureau, and Jim McDonnell, Sheriff, Los Angeles County Sheriff's Department, September 12, 2016. See Appendix G of this Draft EIR.

**Table IV.I.1-2
2016 Part I Crime Totals for West Hollywood Station, LACSD North Patrol Division, and LACSD Service Areas**

Type	West Hollywood Station ^a	LACSD North Patrol Division ^b	LACSD ^c
Homicide	2	30	227
Rape	28	259	845
Robbery	119	882	4,756
Aggravated Assault	142	1,695	9,134
Burglary	243	3,452	13,072
Larceny Theft	1,441	8,829	35,928
Grand Theft Auto	148	1,991	12,819
Arson	9	177	581
Total	2,132	17,315	77,362

^a Los Angeles County Sheriff's Department, West Hollywood Station, 2016 Synopsis, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/whd/synopsis.htm>, accessed May 11, 2017.

^b Los Angeles County Sheriff's Department, North Patrol Division, 2016 Synopsis, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/npd/synopsis.htm>, accessed May 11, 2017.

^c Los Angeles County Sheriff's Department, Department, 2016 Synopsis, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/dept/synopsis.htm>, accessed May 11, 2017.

Source: Los Angeles County Sheriff's Department, 2016 Crime and Arrest Statistics, <http://shq.lasdnews.net/CrimeStats/yir9600/yir2016/index.html>, accessed May 11, 2017.

3. Project Impacts

a. Methodology

Police service demand relates to the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service and any anticipated future changes to existing facilities or services. Changes in these factors resulting from a project may affect the demand for services. As such, the determination of significance relative to impacts on police services is based on the evaluation of existing and future estimations police services for the police station serving the Project Site, including the availability of police personnel to serve the existing and future population, including workers, visitors, and patrons that require service by the West Hollywood Station. The analysis presents statistical averages associated with the West Hollywood Station serving the Project Site, the North Patrol Division, and the LACSD service area. The determination of impact on the capability of existing and future police services and personnel is based on the potential for the annual crimes per resident in the West Hollywood Station service area to exceed current averages before the addition of the

proposed Project. Project design features of the proposed Project are also described and analyzed below.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a sample question that addresses impacts with regard to police protection service. Therefore, in the context of this question from the CEQA Guidelines, a significant impact related to police protection would occur if the proposed Project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, 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 Project Design Features are proposed with regard to police protection:

Project Design Feature I.1-1: During construction, the Applicant will implement appropriate temporary security measures, including security fencing, lighting, and locked entry. In addition, regular security patrols during non-construction hours will also be provided. Construction contractor(s) will document security measures and will coordinate with a construction monitor to ensure they have access to such documentation.

Project Design Feature I.1-2: During operation, the Project will include access controls in the form of private 24/7 on-site security and an Internet Protocol (IP) based security camera system with cameras mounted throughout the proposed building. All recorded video will be stored for a minimum of 30 days.

Project Design Feature I.1-3: The Project will provide member and guest access control at various locations throughout the building, as follows: (i) Members and guests will access the building on Level B1 or Level 1 only, and (ii) Various points throughout the building will be access controlled including, but not limited to, the loading area, elevator cabs, emergency exit doors, security room, storage areas, and swimming pool and roof access.

Project Design Feature I.1-4: The Project will provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature I.1-5: The Project will provide sufficient lighting within the parking structure to maximize visibility and reduce areas of concealment.

Additionally, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, pursuant to Project Design Feature J-1, the Applicant would implement a Construction Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

(1) Construction

Construction of the proposed Project would not substantially increase the level of service population requiring police protection services for the West Hollywood Station service area because the level of population would be reduced for the Project Site during the construction phase. Although the daytime population at the Project Site during construction would be temporary in nature, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As described above in Project Design Feature I.1-1, the Applicant would implement temporary security measures during the construction phase, including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these project design features, potential impacts associated with theft and vandalism during construction activities would be less than significant.

Construction activities could also potentially impact LACSD police protection services and response times within the West Hollywood Station service area due to construction impacts on the surrounding roadways. As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, construction of utility line connections, and the generation of traffic resulting from the movement of construction equipment, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Although construction activities would be short-term and temporary, such construction activities could temporarily increase response times for police vehicles along Sunset Boulevard and other main connectors due to travel time delays caused by traffic during the construction phase. As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, five of the eight studied intersections currently operate at level of service (LOS) D or better during both the A.M. and P.M. peak hours. However, construction-related traffic, including haul truck activity and worker trips to and from the Project Site, would be scheduled so as to occur outside of the A.M. and P.M. peak hours, reducing the potential for

traffic-related conflicts. In addition, to address the potential for the proposed Project's construction activities to increase response times for police vehicles, a Construction Management Plan will be implemented during construction of the proposed Project pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The proposed Project will also implement temporary security measures, such as security fencing, lighting, and locked entry during construction to limit access by the general public. Regular security patrols during non-construction hours will also be provided. Construction contractor(s) will document security measures and will coordinate with a construction monitor to ensure they have access to such documentation. As the use of the public right-of-way along Sunset Boulevard and Hilldale Avenue would require temporary rerouting of pedestrian traffic, the Construction Management Plan would ensure pedestrian safety. Elements of the Construction Management Plan will be implemented, such as flag persons, to provide temporary traffic controls to direct traffic around any closures (e.g., signs, delineators, etc.) and improve traffic flow of adjacent rights-of-way and public roadways. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with police emergency vehicle access. In addition, appropriate detour signage would be employed as necessary to ensure emergency access is maintained to the Project Site and that traffic flow is maintained on street rights-of-way. As concluded in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, the proposed Project's construction activity and worker trips would not result in significant impacts during the excavation, grading, and building phases of construction. Thus, construction-related traffic generated by the proposed Project would not significantly impact LACSD response times within the vicinity of the proposed Project as emergency 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.

Based on the above analysis, upon implementation of the project design features and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LACSD to serve the Project Site. In addition, construction of the proposed Project would not necessitate the provision of new or physically altered governmental facilities in order to maintain the LACSD's capability to serve the Project Site, including with respect to acceptable service ratios, response times and other performance objectives for police protection services. Therefore, impacts on police protection services during construction of the proposed Project would be less than significant, and no mitigation measures would be required.

(2) Operation

As discussed in Section II, Project Description, of this Draft EIR, the proposed Project entails the construction of an approximately 132,000-square-foot building that

would include retail space, an art gallery, creative offices, as well as guestrooms, restaurants, lounges, and bars to support the Arts Club. The proposed Project would not develop residential units and, thus, would not generate any new residential population that would affect existing officer-to-population ratios. However, the proposed Project would introduce new guests, visitors, and employees to the Project Site. As such, the increased intensity of land uses on the Project Site would be expected to increase the frequency of emergency and non-emergency calls to the West Hollywood Station service area.

As shown in Table IV.I.1-2 on page IV.I.1-9, the most common crimes reported in the West Hollywood Station service area were from larceny thefts, burglaries, and grand theft auto. The Project Site is also located along Sunset Boulevard, which contains numerous restaurants, bars, and nightclubs that create high levels of nighttime activity and require continued police presence. As provided above in Project Design Feature I.1-2 through Project Design Feature I.1-5, the Applicant would implement numerous design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature I.1-2, the proposed Project would include private 24/7 on-site security and a closed circuit security camera system. Pursuant to Project Design Feature I.1-3, the proposed Project would include club member and guest access controls throughout the building. Project Design Feature I.1-4 would ensure the building is designed to provide sufficient lighting of building entries, walkways, parking structures, elevators, and lobbies to reduce areas of concealment and to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The proposed Project would also include appropriate lighting and visibility, as provided in Project Design Feature I.1-5. In addition, to the implementation of these project design features, the proposed Project would generate revenues to the City's General Fund, which would continue to support the majority of funding of the City's public safety contract with the LACSD and police services. Such funds would also be used towards staff development, supplies and equipment, and other programs and outreach implemented by the LACSD.¹⁹ The project design features identified above, as well as the proposed Project's contribution to the General Fund, would help offset the Project-related increase in demand for LACSD police services. Therefore, the proposed Project's impact on police services would be less than significant, and no mitigation measures would be required.

Separately, the proposed Project would introduce new uses to the Project Site, which would generate additional traffic in the vicinity of the proposed Project. Project-

¹⁹ *City of West Hollywood, Operating Budget and Capital Work Plan, Two Fiscal Years: 2016–2017 and 2017–2018.*

related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, under Existing with Project Conditions, the proposed Project would result in five of the eight study intersections operating at level of service (LOS) D or better during both the A.M. and P.M. peak hours. Although the remaining three intersections are projected to operate at LOS F during both of the analyzed peak hours, the incremental increase in delay with the addition of traffic from the proposed Project is not anticipated to be significant under Existing with Project Conditions. Similarly, under Future with Project Conditions, the incremental increase in delay with the addition of traffic from the proposed Project is not expected to exceed significance thresholds. As such, impacts would be less than significant under Future with Project Conditions. Nevertheless, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of the proposed Project, including traffic generated by the proposed Project, would not cause a substantial increase in police emergency response times due to traffic congestion. Therefore, the proposed Project's impact on police emergency response times would be less than significant, and no mitigation measures would be required.

Based on the above analysis, upon implementation of the project design features and compliance with state law, operational-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LACSD to serve the Project Site. Furthermore, as police units are predominately mobile, service calls are often responded to by the nearest available unit. As such, the distance between the location of the proposed Project and West Hollywood Station would not affect the level of police protection. Operation of the proposed Project would not necessitate the provision of new or physically altered government facilities in order to maintain the LACSD's capability to serve the Project Site. Accordingly, the proposed Project would not result in adverse physical impacts associated with the need and construction of new or altered facilities. Therefore, impacts on police protection services during operation of the proposed Project would be less than significant, and no mitigation measures would be required.

4. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, a total of 191 related projects are located in the vicinity of the Project Site. Of the 191 related projects, 46 of the related projects are located within the City, and are served by the

LACSD West Hollywood Station.²⁰ A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft EIR.

The proposed Project would not develop residential units and, thus, would not generate a residential population. Therefore, the proposed Project would not contribute to a cumulative increase in the residential service population of LACSD. However, the proposed Project would generate an increase in the non-residential population, which in conjunction with growth forecasted in the City through 2020 (i.e., the proposed Project's anticipated buildout year), would generate an increased demand for police protection service, thus potentially resulting in cumulative impacts on police protection facilities.

The increase in development and residential service populations generated by the proposed Project and related projects would result in a cumulative increase in the demand for LACSD services and could have a cumulative impact on police protection services. Specifically, such would be the case if the proposed Project and other developments in the service area (i.e., those served by the LACSD West Hollywood Station), do not comply with LACSD's requirements for design and construction. Accordingly, this would result in a significant impact to acceptable service ratios, response times, or other applicable performance objectives for police protection services. Specific cumulative impacts with respect to construction and operation of the proposed Project are addressed below.

a. Construction

Impacts to LACSD services and facilities during the construction of each related project would be addressed as part of each related project's development review process conducted by the City. Due to the proximity to the Project Site, should construction of the proposed Project occur concurrently with related projects, specific coordination among these multiple construction sites would be required City and implemented through the proposed Project's Construction Management Plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. As previously described in Project Design Feature I.1-1, the proposed Project will implement appropriate temporary security measures with security fencing, lighting, and locked entry. It is expected that related projects in the City would implement similar design features during construction as each such related project would also be subject to the LACFD's routine construction permitting process, to ensure that sufficient security measures are implemented, prevent emergencies and facilitate appropriate and expedient access and response. Therefore, each related project would reduce its incremental effects on police services in the West Hollywood Station service area.

²⁰ *The neighboring cities of Los Angeles and Beverly Hills operate their own police departments. Therefore, related projects in those cities would not be expected to impact LACSD services.*

In addition, construction-related traffic generated by the proposed Project and the related projects would not significantly impact LACSD response times within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the proposed Project's contribution to cumulative impacts on either police protection services or emergency response during construction would not be significant, and no mitigation measures would be required.

b. Operation

The development of related projects within the West Hollywood Station service area would be expected to increase the intensity of land uses. As such, the development of related project could lead to incremental increases in the demand for police protection services. As discussed above, the proposed Project will implement Project Design Features I.1-2 through I.1-5, which will lessen the demand for police protection services at the Project Site and ensure that Project-level impacts will remain less than significant. Specifically, the proposed Project will provide 24-hour private on-site security, a security camera system, member and guest access control, and sufficient lighting for safety and visual purposes. Each related project would be expected to implement design features similar to the proposed Project during operation that would prevent emergencies and facilitate expedient access and response. Through the implementation of such comparable design features, each related project would reduce its incremental effect on police services in the West Hollywood Station service area. Meanwhile, the City will continue implementing its police protection-related goals, objectives, and policies set forth in Chapter 10, Safety and Noise Element, of the City's General Plan, and the LACSD will continue to evaluate its service needs on an annual basis and expand as necessary to keep pace with projected growth.

Furthermore, similar to the proposed Project, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales, revenue, etc.), which would support the funding of the LACSD and its police services through its contract with the City, including the provision of new police facilities and related staffing, as deemed appropriate. In addition, the payment of development fees by the proposed Project and all related projects would offset the costs of increased service needs and ensure that police service objectives and performance would not be substantially affected by incremental increases in land use intensity and/or population increases within the West Hollywood Station service area.

With regard to police emergency response times, the proposed Project and related projects would introduce new uses to the Project Site that would generate additional traffic in the vicinity of the Project Site. Traffic from the proposed Project and related projects would have the potential to increase emergency vehicle response to the Project Site and

surrounding properties due to travel time delays caused by the additional traffic. As discussed above, the proposed Project is not anticipated to substantially affect existing response times in the West Hollywood Station service area, and the proposed Project would not contribute to a cumulative impact regarding response. Moreover, it is anticipated that 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.

Due to the facilities planning efforts of police services, required payment of requisite development fees of the proposed Project and related projects, and compliance with modern performance standards, cumulative impacts on police protection services would be less than significant.

5. Mitigation Measures

With the implementation of Project Design Features, including Project Design Features I.1-1 through I.1-5 listed above, and compliance with regulatory requirements, Project-level and cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

6. Level of Significance After Mitigation

With implementation of Project Design Features, including Project Design Features I.1-1 through I.1-5 listed above, Project-level and cumulative impacts related to police protection services would be less than significant without mitigation.