

IV. Environmental Impact Analysis

H.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on fire protection. The analysis includes a description of the existing fire protection facilities within the Project area. The analysis uses the following factors from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection and emergency medical services: fire flow requirements, response distance, and emergency access. This analysis is based, in part, on information provided by the LAFD and the *1624 Wilcox Avenue Project Utilities Technical Report* (Utility Report), prepared for the Project by Psomas, dated May 30, 2018, which are included in Appendices J and F of this Draft EIR, respectively.

2. Environmental Setting

a. Regulatory Framework

(1) Occupational Safety and Health Administration

The federal and California Occupational Safety and Health Administrations enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(2) State

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including fire safety standards for new buildings,

which are provided in the California Fire Code (CCR, Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.¹ The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2019 California Fire Code also went into effect on January 1, 2020.² Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.

(b) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and it is reasonable to conclude that the City will comply with that provision to ensure that public safety services are provided.³

¹ *California Building Code, (CCR, Title 24, Part 2).*

² *California Fire Code, (CCR, Title 24, Part 9).*

³ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847

(3) City of Los Angeles

(a) City of Los Angeles Charter

Section 520 of the Los Angeles City Charter states that the LAFD's duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), 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. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood have the necessary level of fire protection service, emergency medical service, and infrastructure.⁴ Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. The City of Los Angeles General Plan Safety Element, discussed below, recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies. Under the Framework Element, the City standard for response distance from a fire station is 1.5 miles.⁵ This is consistent with the specifications for response distances within the LAMC, discussed below.

(c) City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 26, 1996, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities. For example, Policy 2.1.6 requires the LAFD to revise regulations and procedures to include the establishment of minimum standards for the location and

⁴ *City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services.*

⁵ *City of Los Angeles General Plan Framework Element, p. 9-5.*

expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and emergency medical service response. In addition, the Safety Element designates disaster routes. The nearest disaster routes to the Project Site are Highland Avenue, located approximately 0.45 mile to the west, and Santa Monica Boulevard, located approximately 0.75 mile to the south of the Project Site.⁶

(d) Hollywood Community Plan

As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following objective and policies that are relevant to fire protection:

- Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.
- Fire Protection Policy 1: It is the City's policy that the various components of the fire protection/emergency medical services system be continually evaluated and updated by the Fire Department in coordination with other City departments, as fire protection techniques, apparatus, needs and land use patterns change.
- Fire Protection Policy 2: It is the City's policy that the expansion of existing fire stations and the acquisition of new sites be planned and designed to minimize the displacement of housing and relocation of residents.
- Fire Protection Policy 3: It is the City's policy that public education activities concerning the elimination of fire hazards, methods of fire protection and emergency medical service be encouraged.
- Fire Protection Policy 4: It is the City's policy that the existing paramedic program be continually evaluated, updated and improved.
- Fire Protection Policy 5: It is the City's policy that the City intensify its program of fire protection through weed abatement.

⁶ City of Los Angeles General Plan Safety Element, Exhibit H, adopted by the City Council, November 26, 1996.

(e) Los Angeles Municipal Code

The LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. LAMC Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code) sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials.⁷ Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, LAMC Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable.

The LAMC also addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. The Project proposes to construct a mixed-use development comprised of residential and commercial uses. As set forth in LAMC Section 57.507.3.1, and as determined by the LAFD, the Project falls under the Industrial and Commercial category,

⁷ *LAMC Article 7, Chapter 5, Former Article 7 Repealed and Replaced by Ordinance Number 182,822, effective January 10, 2014, known as the Los Angeles Fire Code. This version of the Los Angeles Fire Code incorporates by reference portions of the 2013 edition of the California Fire Code and the 2012 edition of the International Fire Code.*

which have a minimum required fire flow of 6,000 to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on LAMC Table 57.507.3.3, the maximum response distance for land uses in the Industrial and Commercial category from fire stations with an engine company is 1 mile and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. As discussed in further detail below, Fire Station No. 27, located at 1327 North Cole Avenue, is approximately 0.4 mile south of the Project Site and would serve as the "first-in" fire station to the Project Site. Fire Station No. 27 is equipped with one engine, one truck, two ambulances, and one Urban Search and Rescue apparatus.⁸ Therefore, the Project Site is located within the required response distance from a fire station with an engine or truck company.

The LAMC classifies high-rises as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access. LAMC Section 57.409 addresses emergency planning and evacuation requirements for high-rise buildings, including the creation and filing of an emergency plan; LAFD approval of emergency plans, procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations. All emergency plans, procedures, and evacuation signs must be completed and submitted to the LAFD for inspection and approval prior to their implementation in accordance with LAMC Section 57.409.3. LAMC Section 57.409.8.3 requires emergency evacuation signs to be posted in elevator lobbies and adjacent to the doorway leading to the exit stairs. LAMC Section 57.409.9.3 requires residential high-rise buildings to conduct mandatory fire drills at least annually under the direction of a designated Fire Safety Director. In addition, LAMC Section 57.4705 addresses specific fire safety requirements for new high-rises, including specific requirements related to an elevator system, vertical exit enclosures,

⁸ *Personal communication with LAFD Fire Station No. 27, Firefighter Gonzalez, August 7, 2017.*

portable fire extinguishers in each residential occupancy unit, and standby power for window washing equipment. In accordance with LAMC Section 57.4705.1.5, at least one elevator in each bank of elevators must be available for fire emergency service. LAMC Section 57.4705.1.7 requires that at least one elevator car serving all building levels must be available for emergency use. Furthermore, LAMC Section 57.4705.4 requires all high-rise buildings to provide a rooftop emergency helicopter landing facility, unless certain life safety features, as specified by the LAFD, are provided.

(f) City of Los Angeles Propositions

The City Fire Facilities Bond (Proposition F), approved by voters in November 2000, allocated \$378.6 million to build 19 new or replacement neighborhood fire/paramedic stations.⁹ The Proposition F—Fire Facilities Bond Team oversees allocation of funds and consists of the LAFD, the Bureau of Engineering, and Bovis Lend Lease. The team identified numerous projects to upgrade fire facilities including construction of new training centers, replacing and constructing new fire stations, and building a new Air Operations Helicopter Facility and General Services Helicopter Fleet Maintenance Building.

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involves the spending of \$600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities.¹⁰ Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, replacement of one new police station and jail, construction of two bomb squad facilities, construction of one new Metro detention center, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of one new Valley Traffic Division and Bureau Headquarters, renovation of fire facilities, and renovation of police facilities.¹¹

Measure J, which was approved by voters at the November 7, 2006, election, is a Charter amendment and ordinance that involves technical changes to Proposition F. Under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations was required to take place on single sites of at least 2 acres. Measure J allows new regional fire stations funded by Proposition F and

⁹ *City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, www.eng.lacity.org/fire_bond, accessed January 9, 2020.*

¹⁰ *City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.*

¹¹ *City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.*

located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres.

(g) Los Angeles Fire Department Strategic Plan 2018-2020¹²

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD’s organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015-2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) provide exceptional public safety and emergency service; (2) embrace a healthy, safe and productive work environment; (3) implement and capitalize on advanced technology; (4) enhance LAFD sustainability and community resiliency; and (5) increase opportunities for personal growth and professional development. With implementation of specific strategies, the Strategic Plan 2018–2020 will also align its progress with City of Los Angeles Mayor Eric Garcetti’s four priority outcomes to provide a safe city, a well-run city government, a livable and sustainable city, and a prosperous city.

b. Existing Conditions

(1) Fire Protection Facilities, Services, and Response Times

The LAFD serves as the City’s life safety agency with approximately 3,246 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.¹³ There are 106 neighborhood fire stations strategically located across the LAFD’s 471-square-mile jurisdiction.¹⁴ At any given time, a total of 1,018 firefighters, including 270 paramedics, are on 24-hour duty.¹⁵ In addition, the LAFD is supported by 353 technical and administrative personnel.¹⁶

As shown in Figure IV.H.1-1 on page IV.H.1-9, there are three LAFD fire stations located within 2 miles of the Project Site. The closest station to the Project Site is Fire Station No. 27, which is the designated “first in” station, located approximately 0.4 mile

¹² LAFD, *Strategic Plan 2018-2020, A safer City 2.0*, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed January 9, 2020.

¹³ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed January 9, 2020.

¹⁴ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed January 9, 2020.

¹⁵ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed January 9, 2020.

¹⁶ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed January 9, 2020.

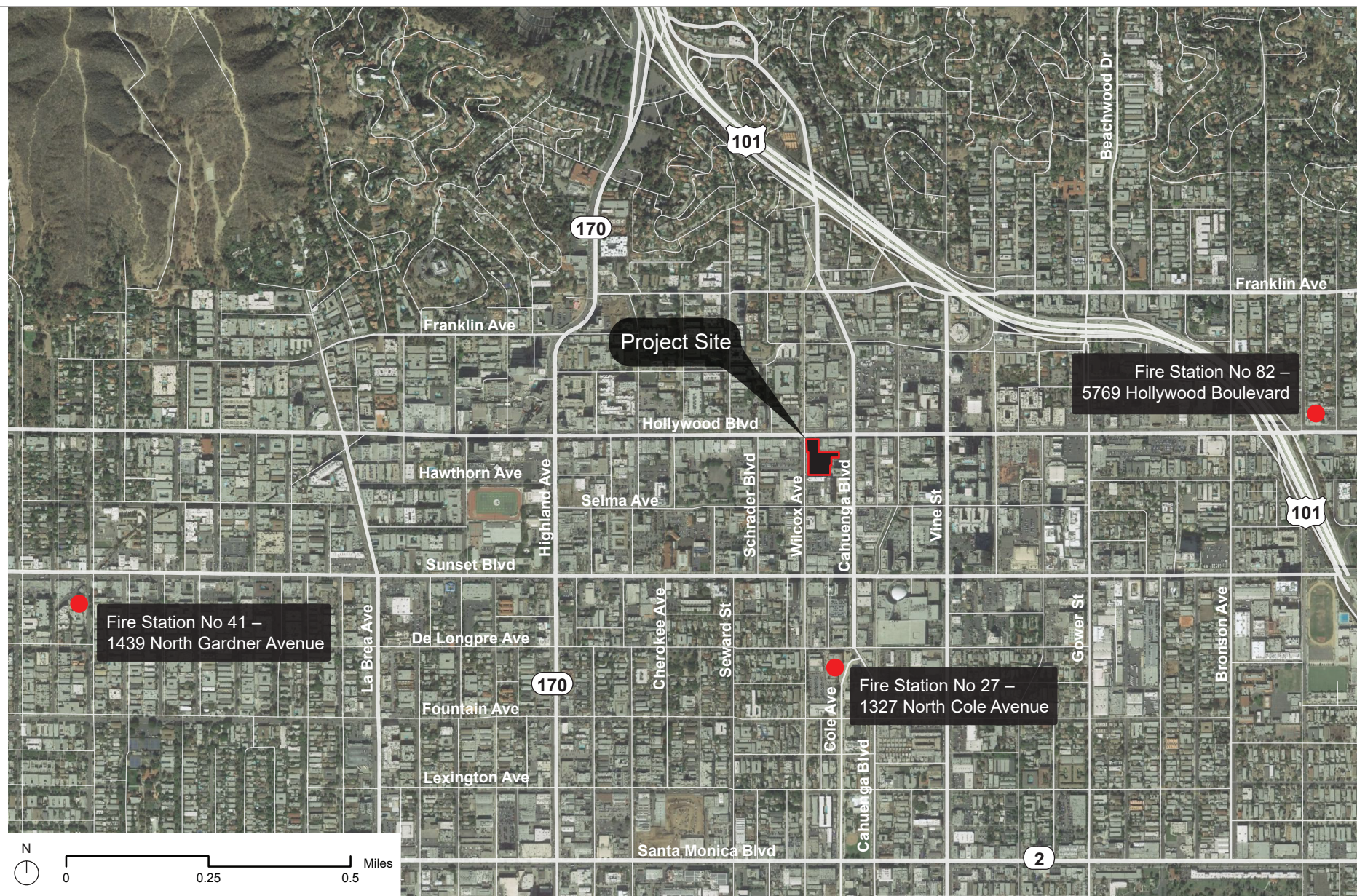


Figure IV.H.1-1
Fire Stations in the Vicinity of the Project Site

south of the Project Site at 1327 North Cole Avenue.¹⁷ As shown in Table IV.H.1-1 on page IV.H.1-11, Fire Station No. 27 consists of one engine, one truck, two ambulances, and one Urban Search and Rescue apparatus; and houses one battalion chief, two captains, 13 firefighters, two engineers, one apparatus operator, and two paramedics.¹⁸

Secondary fire stations that serve the Project Site include Fire Station No. 82, which is located approximately 0.9 mile east of the Project Site at 5769 Hollywood Boulevard, and Fire Station No. 41, which is located approximately 1.6 miles southwest of the Project Site at 1439 North Gardner Street.¹⁹ Fire Station No. 82 consists of one engine and one ambulance; and houses one captain, three firefighters, one engineer, one apparatus operator, and two paramedics.²⁰ Fire Station No. 41 consists of one engine, one truck, and one ambulance; and houses one captain, two firefighters, one engineer, one apparatus operator, and one paramedic.²¹

The response times for the stations serving the Project Site shown in Table IV.H.1-2 on page IV.H.1-12, are for informational purposes only since LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response. Roadway congestion, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response. The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a

¹⁷ LAFD, *Find Your Station*, www.lafd.org/fire-stations/station-results?st=441&address=6440%20Hollywood%20Boulevard, accessed January 9, 2020.

¹⁸ Personal communication with LAFD Fire Station No. 27, Firefighter Gonzalez, August 7, 2017.

¹⁹ LAFD, *Hollywood and Wilcox NOP Comment Letter*, June 17, 2017. See Appendix J of this Draft EIR.

²⁰ Personal communication with LAFD Fire Station No. 82, Captain Tony Parr, August 8, 2017.

²¹ Personal communication with LAFD Fire Station No. 41, Captain Kevin Willis, August 8, 2017.

**Table IV.H.1-1
Los Angeles Fire Department Fire Stations Located in the Project Vicinity**

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 27 1327 North Cole Avenue Hollywood	0.4 mile	<ul style="list-style-type: none"> • 1 Engine • 1 Truck • 2 Ambulances • 1 Urban Search and Rescue Apparatus 	<ul style="list-style-type: none"> • 1 Battalion Chief • 2 Captains • 13 Firefighters • 2 Engineers • 1 Apparatus Operator • 2 Paramedics
Fire Station No. 82 5769 Hollywood Boulevard Hollywood	0.9 mile	<ul style="list-style-type: none"> • 1 Engine • 1 Ambulance 	<ul style="list-style-type: none"> • 1 Captain • 3 Firefighters • 1 Engineer • 1 Apparatus Operator • 2 Paramedics
Fire Station No. 41 1439 North Gardner Avenue Hollywood	1.6 miles	<ul style="list-style-type: none"> • 1 Engine • 1 Truck • 1 Ambulance 	<ul style="list-style-type: none"> • 1 Captain • 2 Firefighters • 1 Engineer • 1 Apparatus Operator • 1 Paramedic
<p><i>Source: Based on telephone conversations with Firefighter Gonzalez (Fire Station No. 27), Captain Tony Parr (Fire Station No. 82), and Captain Kevin Willis (Fire Station No. 41), August 8, 2017.</i></p>			

given area increases, it is the LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847 ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area, as well as surface parking. Vehicular access to the surface parking is provided via a driveway on Wilcox Avenue.

(3) Fire Water Infrastructure

As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with

**Table IV.H.1-2
Average Emergency Medical Service and Structure Fire Response Times**

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 27	6:32	6:03
Fire Station No. 82	6:42	6:21
Fire Station No. 41	6:57	7:24
Citywide	6:39	6:23
<p>^a Response times are based on January–December 2019 data.</p> <p>Source: LAFD, FireStatLA, Fire Station 27 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=441&year=2019, accessed January 9, 2020; LAFD, FireStatLA, Fire Station 82 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=681&year=2018, accessed January 9, 2020; LAFD, FireStatLA, Fire Station 41 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=496&year=2018, accessed January 9, 2020; and LAFD, FireStatLA, Citywide Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map, accessed January 9, 2020.</p>		

the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via a 16-inch water main on Hollywood Boulevard, a 6-inch water main on Wilcox Avenue, and 8- and 36-inch water mains on Cahuenga Boulevard. There are two existing fire hydrants at the southwestern and northeastern corners of the intersection of Hollywood Boulevard and Wilcox Avenue, two existing fire hydrants at the southwestern and northwestern corners of the intersection of Hollywood Boulevard and Cahuenga Boulevard, one hydrant at the northwestern corner of the intersection of Selma Avenue and Wilcox Avenue, one hydrant at the southwestern corner of the intersection of Selma Avenue and Cahuenga Boulevard, and one hydrant mid-block along Cahuenga Boulevard between Hollywood Boulevard and Selma Avenue, for a total of seven existing hydrants near the Project Site.²²

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.²³ However, the Project Site is located in Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations

²² Psomas, 1624 Wilcox Avenue Project, Utilities Technical Report, May 30, 2018. See Appendix F of this Draft EIR.

²³ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 6440 Hollywood Blvd., <http://zimas.lacity.org/>, accessed January 9, 2020.

to reduce fire hazard-related risks.²⁴ According to the City of Los Angeles Department of Building and Safety, construction and buildings within Fire District No. 1 are required to comply with regulations related to, but not limited to, fire-resistance-rated construction, permitted types of exterior walls, roofing, elevations, sprinklers, loading platforms, and material use.²⁵

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e. fire), 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 fire protection services?

In assessing impacts related to fire protection in this section, the City will use Appendix G as the thresholds of significance. The factors identified from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* states that a project would normally have a significant impact on fire protection services if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service.

The need for or deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact, but rather a social and/or economic impact.²⁶ Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact related to fire protection and emergency medical services will result from

²⁴ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 6440 Hollywood Blvd., <http://zimas.lacity.org/>, accessed January 9, 2020.

²⁵ City of Los Angeles, Department of Building and Safety, Supplemental Plan Check Corrections Sheet for Fire District 1 and Very High Fire Hazard Severity Zone (2017 LABC), revised 1/1/17.

²⁶ City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

the construction of new or expanded fire protection and emergency medical facilities. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

b. Methodology

Project impacts regarding fire services are evaluated by the LAFD on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, and response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. This evaluation of impacts considers whether or not the project would create the need for a new fire station or physical alterations of existing facilities that would result in an environmental impact. Consultation with the LAFD is also conducted to determine the project's effect on fire protection and emergency medical services.

c. Project Design Features

The following project design feature is proposed with respect to fire protection:

Project Design Feature FIR-PDF-1: Automatic fire sprinkler systems shall be installed in all new non-high-rise buildings.

In addition, as part of the Project, the 9,000-square-foot Attie Building, a contributing structure to the Hollywood Boulevard Commercial and Entertainment District would be rehabilitated and restored, while maintaining its current use as commercial space. Per California Building Code Section 3404A.1, alterations to any building or structure shall comply with the requirements of the code for new construction. Therefore, the applicable provisions of the California Fire Code and LAMC discussed above and in the analysis below apply to the rehabilitation of this historic structure.

d. Analysis of Project Impacts

Threshold (a): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., fire), 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 fire protection services?

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration (OSHA) has developed safety and health provisions for implementation during construction, which are set forth in 29 CFR, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.²⁷ Additionally, in accordance with the provisions of OSHA regulations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.²⁸ Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, as discussed in the Project's Traffic Study included as Appendix O.1 of this Draft EIR, while construction activities would primarily be contained within the

²⁷ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 9, 2020.

²⁸ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 9, 2020.

boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times for emergency vehicles along Hollywood Boulevard and Wilcox Avenue, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, as discussed in the Project's Traffic Study, of this Draft EIR, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of 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. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant.

Based on the above, Project construction would not 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 fire protection services. Therefore, impacts to fire protection and emergency medical services during Project construction would be less than significant, and no mitigation measures are required.

(b) Operation

The analysis of the Project's potential operational impacts on LAFD services addresses potential impacts associated with LAFD resources and equipment, response

distances and access, and the ability of the fire water infrastructure system to provide the necessary fire flows.

(i) Facilities and Equipment

The Project Site is expected to continue to be served by Fire Station No. 27, the “first-in” station for the Project Site, located approximately 0.4 mile south of the Project Site. As shown in Table IV.H.1-1 on page IV.H.1-11, Fire Station No. 27 is equipped with one engine, one truck, two ambulances, and one Urban Search and Rescue apparatus. Fire Station No. 27 houses one battalion chief, two captains, two engineers, 13 firefighters, two paramedics, and one apparatus operator, one chief. In addition, Fire Station No. 82 and No. 41, located approximately 0.9 mile and 1.3 miles east and southwest of the Project Site, respectively, would continue to be available to serve the Project Site in the event of an emergency. Fire Station No. 82, previously located at 1800 North Bronson Avenue, was recently replaced by a new station located at 5769 Hollywood Boulevard that includes upgraded fire protection systems. The new Fire Station No. 82 is equipped with one ambulance and one engine; and houses one captain, one engineer, one apparatus operator, two paramedics, and three firefighters. Fire Station No. 41 is equipped with one engine, one truck, and one ambulance; and houses one captain, one engineer, one apparatus operator, one paramedic, and two firefighters.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area, as well as surface parking, which currently generate demand for LAFD fire protection and emergency medical services. However, the Project Site currently does not contain any housing units and there is currently no residential population on the Project Site that would require LAFD fire protection and emergency medical services. The Project would include the development of 260 residential units, 33,750 square feet of open space, and 17,800 square feet of commercial and office uses, which would generate a new residential population in the service area of Fire Station No. 27.

As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, according to the 2017 American Community Survey, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.^{29,30} Applying this factor, development of 260 units would

²⁹ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019. The Initial Study prepared for the Project and included as Appendix A of this Draft EIR used a rate of 2.86 persons per unit based on a single year estimate from the American Community Survey. The Department of City Planning subsequently confirmed the 2.42 average was the factor to be used. As discussed further below, this rate still provides a conservative analysis.

result in a net increase of approximately 630 residents. In addition, the Project's 17,800 square feet of commercial and office uses would generate approximately 39 employees. Therefore, the Project's population would increase the demand for LAFD fire protection and emergency medical services. However, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. While the Project Site would be located within the required response distance from a fire station with an engine or truck company (i.e., Fire Station No. 27), pursuant to LAMC Section 57.507.3.3, the Project would be required to be constructed with automatic fire sprinkler systems because it meets the LAMC definition of a high-rise building. In addition, to enhance fire safety, as provided in Project Design Feature FIR-PDF-1, above, the Project includes the installation of automatic fire sprinklers in all non-high-rise buildings, which would further augment fire suppression building techniques and fire code requirements.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided on site. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Hollywood Community Plan, as listed in the regulatory framework above, the City, along with LAFD, would continue to monitor the demand for existing and projected fire facilities (Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 1 of the Hollywood Community Plan) and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element).

(ii) Response Distance and Emergency Access

Pursuant to LAMC Section 57.507.3.3, for land uses in the Industrial and Commercial category, which includes the Project Site, the required response distance from

³⁰ *The draft Hollywood Community Plan Update being prepared by the City utilizes an estimated household size of 1.98 persons per unit. However, unlike the American Community Survey, which takes into account different unit sizes when estimating average household sizes ranging from 2 persons per unit to 2.42 persons per unit, the Hollywood Community Plan Update's projected household size of 1.98 persons per unit does not take into account different unit sizes. Thus, for projects containing two-bedroom and larger units, it is more conservative to utilize the average household size calculated using data from the American Community Survey 5-year average rather than the draft Hollywood Community Plan Update. Therefore, because the Project proposes a range of studio, one-bedroom, and two-bedroom units, this Draft EIR assumes the higher 2.42 persons per unit factor to provide a more conservative analysis.*

a fire station with an engine company is 1 mile, and the required response distance from a truck company is 1.5 miles. As discussed above, Fire Station No. 27, which would serve as the “first-in” fire station to the Project Site, is located approximately 0.4 mile south of the Project Site and is equipped with one engine, one truck, two ambulances, and one Urban Search and Rescue apparatus. In addition, Fire Station No. 82 is located approximately 0.9 mile east of the Project Site and is equipped with one ambulance and one engine. Therefore, the Project would fall within the LAFD’s maximum prescribed response distances from a fire station with an engine company and a truck company.

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided via a new driveway on Wilcox Avenue. Project-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 traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project vicinity. Based on the Project Site’s location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, the drivers of 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. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle access to the Project Site and surrounding area. Furthermore, the Project’s driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

(iii) Fire Flow

As described in Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by

development type. Initial discussions with LAFD indicated a fire flow of 12,000 gpm flowing from eight hydrants simultaneously would be required, which would require the installation of an eighth fire hydrant on Wilcox Avenue adjacent to the Project Site. However, subsequent communication with LAFD confirmed the Project falls within the Industrial and Commercial category, which has a required minimum fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow.

As previously stated, there are currently seven existing fire hydrants located near the Project Site; two are located at the southwestern and northeastern corners of the intersection of Hollywood Boulevard and Wilcox Avenue, two are located at the southwestern and northwestern corners of the intersection of Hollywood Boulevard and Cahuenga Boulevard, one is located at the northwestern corner of the intersection of Selma Avenue and Wilcox Avenue, one is located at the southwestern corner of the intersection of Selma Avenue and Cahuenga Boulevard, and one is located mid block along Cahuenga Boulevard between Hollywood Boulevard and Selma Avenue.³¹ The eighth public fire hydrant would be installed on Wilcox Avenue in front of the Project Site. The Fire Flow Availability Report indicates adequate pressure and flow would be available to meet the required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow

(iv) Conclusion

Based on the analysis above, Project operation would not 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 fire protection services. Therefore, impacts to during Project operation would be less than significant, and no mitigation measures are required.

(2) Mitigation Measures

Project-level impacts with regard to fire protection facilities would be less than significant. Therefore, no mitigation measures are required.

³¹ Psomas, 1624 Wilcox Avenue Project, Utilities Technical Report, May 30, 2018. See Appendix F of this Draft EIR.

(3) Level of Significance After Mitigation

Project-level impacts with regard to fire protection facilities would be less than significant.

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection and emergency medical services are the service areas of Fire Station Nos. 27, 82, and 41. As discussed in Section III, Environmental Setting, of this Draft EIR, cumulative growth in the greater Project area through 2023 (i.e., the Project buildout year) includes 107 specific known development projects, as well as general ambient growth projected as a result of the land use designation and policy changes contained in the Hollywood Community Plan Update, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 27, 82, and 41. The increase in development and residential service populations from the Project and related projects would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services. However, similar to the Project, the related projects would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented pursuant to project specific requirements, and LAMC and State fire code requirements, which include a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Moreover, given that the Project Site is located within an urban area, each of the related projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. The Project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. LAFD would also continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and allocated according to the priorities at the time.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) discussed in

Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, as discussed above, such facilities would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Based on the above, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

Cumulative impacts with regard to fire protection facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to fire protection facilities would be less than significant.