

Appendix E

LAFD Response Letter

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

October 19, 2017

To: Vincent Bertoni, AICP, Director of Planning
Department of City Planning
Attention: Kathleen King

From: Fire Department

**Subject: NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT
REPORT AND PUBIC SCOPING MEETING**

CASE NO.: ENV-2016-3743-EIR
PROJECT NAME: Modera Argyle
PROJECT APPLICANT: MCRT Investments, LLC
PROJECT ADDRESS: 1546 N. Argyle Avenue and 6224 W. Selma Avenue,
Los Angeles, CA 90028

PROJECT DESCRIPTION:

The Project would demolish the existing commercial buildings and construct a seven-story mixed-use buiding containing a ground-floor level with a mezzanine, six residential levels, and four subterranean parking levels. The Project would include 276 residential units, including 5 percent (13 units) for Very Low Income (VLI) households, and approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses. Alternatively, an approximately 27,000 square-foot grocery store could be constructed in lieu of the proposed retail and restaurant uses. The proposed building would reach a maximum height of 85 feet. The Project would also provide a minimum of 364 vehicle parking spaces (or 370 vehicle parking spaces for the grocery store option) and 328 bicycle parking spaces. General Plan Amendment to the Hollywood Community Plan from Commercial Manufacturing to Regional Center Commercial.

The following comments are furnished in response to your request for this Department to review the proposed development:

FIRE FLOW:

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 2,000 gallons per minute (G.P.M.) in low density residential areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. The required fire-flow for this project has been set at **6,000 to 9,000 G.P.M. from four to six fire hydrants flowing simultaneously.**

Improvements to the water system in this area may be required to provide 6,000 to 9,000 G.P.M. fire-flow. The cost of improving the water system may be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

RESPONSE DISTANCE:

Based on a required fire-flow of 6,000 to 9,000 G.P.M., the first-due Engine Company should be within 1 mile(s), the first-due Truck Company within 1 ½ mile(s).

FIRE STATIONS:

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

DISTANCE	Fire Station No.	EQUIPMENT AND SERVICES	STAFF
0.7	Fire Station No. 27 1327 N. Cole Avenue Los Angeles, CA 90028	Headquarters Battalion 5 Task Force Truck and Engine Company Paramedic Rescue Ambulance EMT Rescue Ambulance	15
0.7	Fire Station No. 82 5769 W. Hollywood Blvd. Los Angeles, CA 90028	Single Engine Company Paramedic Rescue Ambulance	6
1.7	Fire Station No. 41 1439 N. Gardner Street Los Angeles, CA 90046	Single Engine Company	4
2.4	Fire Station No. 52 4957 Melrose Avenue Los Angeles, CA 90029	Single Engine Company Paramedic Rescue Ambulance Paramedic Supervisor	7
2.4	Fire Station No. 76 3111 N. Cahuenga Blvd. Los Angeles, CA 90068	Single Engine Company	4

Based on these criteria (response distance from existing fire stations), fire protection would be considered **adequate**.

The Department is concerned that the proposed project could have a cumulative impact on fire protection services; and therefore request/recommends that the Environmental Impact Report (EIR) prepared for this project analyze whether such a cumulative impact on fire protection services will occur.

FIREFIGHTING PERSONNEL & APPARATUS ACCESS:

During demolition, the Fire Department access will remain clear and unobstructed.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

One or more Knox Boxes will be required to be installed for LAFD access to project. location and number to be determined by LAFD Field inspector. (Refer to FPB Req # 75).

The entrance to a Residence lobby must be within 50 feet of the desired street address curb face.

Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.

The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.

The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 EXCEPTION

- When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
- It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path of travel to be taken by a person responding to an emergency in the building.

- This policy does not apply to single-family dwellings or to non-residential buildings.

Building designs for multi-storied residential buildings shall incorporate at least one access stairwell off the main lobby of the building; But, in no case greater than 150ft horizontal travel distance from the edge of the public street, private street or Fire Lane. This stairwell shall extend onto the roof.

Entrance to the main lobby shall be located off the address side of the building.

Any required Fire Annunciator panel or Fire Control Room shall be located within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.

Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Submit plot plans indicating access road and turning area for Fire Department approval.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.

All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.

Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.

Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.

SECTION 510 - EMERGENCY RESPONDER RADIO COVERAGE

5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

EMERGENCY HELICOPTER LANDING FACILITY

Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities.

Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.

That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:

- A. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
- B. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.
- C. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
- D. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.

E. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.

The plot plans shall be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.

CONCLUSION:

The inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level.

Definitive plans and specifications shall be submitted to this Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.

The Los Angeles Fire Department continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following:

1. Increased staffing for existing facilities. (I.E., Paramedic Rescue Ambulance and EMT Rescue Ambulance resources.)
2. Additional fire protection facilities.
3. Relocation of present fire protection facilities.

For additional information, please contact the Fire Development Services Section, Hydrants & Access Unit at **(213) 482-6543**.

RALPH M. TERRAZAS,
Fire Chief

Kristin Crowley, Fire Marshal
Bureau of Fire Prevention and Public Safety

KC:RED:yw