# IV. Environmental Impact Analysis F.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 and emergency medical services. The analysis includes a description of the existing fire protection and emergency medical services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection and emergency medical services: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning (October 19, 2017), which is included in Appendix E of this Draft EIR; and the *Utility Infrastructure Technical Report: Water, Wastewater, Dry Utilities* (Utility Report), prepared for the Project by Kimley-Horn (February 21, 2019), which is included in Appendix L of this Draft EIR.

# 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. 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, 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 (California Code of Regulations, 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 2016 edition of the California Building Code became effective on January 1, 2017.<sup>1</sup> 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 2016 California Fire Code also went into effect on January 1, 2017.<sup>2</sup> 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 Trustees 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

<sup>&</sup>lt;sup>1</sup> California Building Code, (California Code of Regulations, Title 24, Part 2).

<sup>&</sup>lt;sup>2</sup> California Fire Code, (California Code of Regulations, Title 24, Part 9).

services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.<sup>3</sup> The *Hayward* ruling also concluded that "assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings" and the "need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."<sup>4</sup>

## (3) Local

#### (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.<sup>5</sup> 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

<sup>&</sup>lt;sup>3</sup> <u>City of Hayward v. Board of Trustees of California State University</u> (2015) 242 Cal. App. 4th 833, 847.

<sup>&</sup>lt;sup>4</sup> <u>City of Hayward v. Board of Trustees of California State University</u> (2015) 242 Cal. App. 4th 833, 847, 843.

<sup>&</sup>lt;sup>5</sup> City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services.

City standard for response distance from a fire station is 1.5 miles.<sup>6</sup> 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 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 City's Safety Element designates disaster routes. The nearest disaster routes to the Project Site are Santa Monica Boulevard, located approximately 0.65 mile south of the Project Site, and Highland Avenue, located approximately 0.78 mile to the west.<sup>7</sup>

#### (d) Hollywood Community Plan

As discussed in Section IV.D, Land Use, of this Draft EIR, the Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan (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.

<sup>&</sup>lt;sup>6</sup> City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire.

<sup>&</sup>lt;sup>7</sup> City of Los Angeles General Plan Safety Element, Exhibit H, adopted by the City Council, November 26, 1996.

- 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.

## (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. Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code) of the LAMC 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.<sup>8</sup> 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

<sup>&</sup>lt;sup>8</sup> Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.

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. 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, which has a minimum required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi unless otherwise determined by LAFD.

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. As discussed in the Utility Report, based on preliminary discussion with the LAFD, the installation of a new fire hydrant may be required.

LAMC Section 57.512.1 provides that response distances, which are based on I and use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on Table 57.507.3.3 provided in LAMC Section 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 1.0 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 0.7 mile southwest of the Project Site and would serve as the "first-in" fire station to the Project Site. Fire Station No. 27 is equipped with a task force truck and engine company, paramedic rescue ambulance, Emergency Medical Technician (EMT) rescue ambulance, and has a staff of 15.<sup>9</sup> Fire Station No. 27 also serves as the headquarters of Battalion 5. Therefore, the Project Site is located within the required response distance from a fire station with a truck company.

<sup>&</sup>lt;sup>9</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

## (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.<sup>10</sup> 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.<sup>11</sup> 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.<sup>12</sup>

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 two acres. Measure J allows new regional fire stations funded by Proposition F and located in densely developed areas to be designed and built on one or more properties equaling less than two acres.

#### (g) Los Angeles Fire Department Strategic Plan 2018–2020<sup>13</sup>

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

<sup>&</sup>lt;sup>10</sup> City of Los Angeles, Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond Projects, www.eng.lacity.org/fire\_bond, accessed October 6, 2017.

<sup>&</sup>lt;sup>11</sup> 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.

<sup>&</sup>lt;sup>12</sup> 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.

<sup>&</sup>lt;sup>13</sup> LAFD, Strategic Plan 2018–2020.

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.<sup>14</sup> There are 106 neighborhood fire stations strategically located across the LAFD's 471-square-mile jurisdiction.<sup>15</sup> At any given time, a total of 1,018 firefighters, including 270 paramedics, are on 24-hour duty.<sup>16</sup> In addition, the LAFD is supported by 353 technical and administrative personnel.<sup>17</sup>

As shown in Figure IV.F.1-1 on page IV.F.1-9, there are three LAFD fire stations located within a 2-mile radius 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 0.7 mile southwest of the Project Site at 1327 North Cole Avenue.<sup>18</sup> As shown in Table IV.F.1-1 on page IV.F.1-10, Fire Station No. 27 consists of a task force truck and engine company, paramedic rescue ambulance, EMT rescue ambulance, and 15 staff.<sup>19</sup>

<sup>&</sup>lt;sup>14</sup> LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed December 26, 2018.

<sup>&</sup>lt;sup>15</sup> LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed December 26, 2018.

<sup>&</sup>lt;sup>16</sup> LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed December 26, 2018.

<sup>&</sup>lt;sup>17</sup> LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed December 26, 2018.

<sup>&</sup>lt;sup>18</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

<sup>&</sup>lt;sup>19</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.



Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing	
Fire Station No. 27 1327 North Cole Avenue Los Angeles, CA 90028	0.7 mile	<ul> <li>Task Force Truck and Engine Company</li> <li>Paramedic Rescue Ambulance</li> <li>EMT Rescue Ambulance</li> <li>Battalion 5 Headquarters</li> </ul>	15	
Fire Station No. 82 5769 West Hollywood Boulevard Los Angeles, CA 90028	0.7 mile	<ul><li>Single Engine Company</li><li>Paramedic Rescue Ambulance</li></ul>	6	
Fire Station No. 41 1439 North Gardner Avenue Los Angeles, CA 90046	1.7 miles	Single Engine Company	4	
Fire Station No. 52 4957 Melrose Avenue Los Angeles, CA 90029	2.4 miles	<ul> <li>Single Engine Company</li> <li>Paramedic Rescue Ambulance</li> <li>Paramedic Supervisor</li> </ul>	7	
Fire Station No. 76 3111 North Cahuenga Boulevard Los Angeles, CA 90068	2.4 miles	Single Engine Company	4	
Source: Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.				

 Table IV.F.1-1

 Los Angeles Fire Department Fire Stations Located in the Project Vicinity

Secondary fire stations that serve the Project Site include Fire Station No. 82, which is located approximately 0.7 mile northeast of the Project Site at 5769 Hollywood Boulevard, and Fire Station No. 41, which is located approximately 1.7 miles west from the Project Site at 1439 North Gardner Street.<sup>20</sup> Fire Station No. 82 consists of a single engine company and paramedic rescue ambulance, and has staff of six.<sup>21</sup> Fire Station No. 41 consists of a single engine company and has a staff of four.<sup>22</sup>

The LAFD identified two additional fire stations beyond a 2-mile radius of the Project Site: Fire Station No. 52 and Fire Station No. 76. Fire Station No. 52 is located approximately 2.4 miles southeast from the Project Site at 4957 Melrose Avenue. It consists of a single engine company, paramedic rescue ambulance, and paramedic

<sup>&</sup>lt;sup>20</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

<sup>&</sup>lt;sup>21</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

<sup>&</sup>lt;sup>22</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

supervisor, and has a staff of seven. Fire Station No. 76 is located approximately 2.4 miles northwest of the Project Site at 3111 North Cahuenga Boulevard. It consists of a single engine company and has a staff of four.<sup>23</sup>

Specific response times for the stations included in Table IV.F.1-1 on page IV.F.1-10 during January through November 2018 are shown in Table IV.F.1-2 on page IV.F.1-12. For first-in Fire Station No. 27, the average response time for emergency medical service (EMS) incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 5 minutes 52 seconds.<sup>24</sup> For Fire Station No. 82, the average response time for EMS incidents was 6 minutes 24 seconds, and the average response time for non-EMS incidents was 6 minutes 59 seconds.<sup>25</sup> For Fire Station No. 41, the average response time for EMS incidents was 6 minutes 59 seconds, and the average response time for non-EMS incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 6 minutes 16 seconds, and the average response time for non-EMS incidents was 6 minutes 3 seconds.<sup>26</sup> For Fire Station No. 52, the average response time for EMS incidents was 7 minutes 40 seconds, and the average response time for non-EMS incidents was 7 minutes 37 seconds.<sup>28</sup> Citywide, the average response times were 6 minutes 29 seconds for EMS incidents and 6 minutes 17 seconds for non-EMS incidents.<sup>29</sup>

LAFD has not established response times 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.<sup>30</sup> Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic

<sup>&</sup>lt;sup>23</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

<sup>&</sup>lt;sup>24</sup> LAFD, FireStatLA, Fire Station 27 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=441& year=2018, accessed December 26, 2018.

<sup>&</sup>lt;sup>25</sup> LAFD, FireStatLA, Fire Station 82 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=681& year=2018, accessed December 26, 2018.

<sup>&</sup>lt;sup>26</sup> LAFD, FireStatLA, Fire Station 41 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=496& year=2018, accessed December 26, 2018.

<sup>&</sup>lt;sup>27</sup> LAFD, FireStatLA, Fire Station 52 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=546& year=2018, accessed December 26, 2018.

<sup>&</sup>lt;sup>28</sup> LAFD, FireStatLA, Fire Station 76 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=656& year=2018, accessed December 26, 2018.

<sup>&</sup>lt;sup>29</sup> LAFD, FireStatLA, City Wide Response Metrics for 2018, www.lafd.org/fsla/stations-map?year=2018, accessed December 26, 2018.

<sup>&</sup>lt;sup>30</sup> NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for EMS and fire suppression incidents.

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	6:16	5:52	
Fire Station No. 82	6:24	6:12	
Fire Station No. 41	6:59	7:16	
Fire Station No. 52	6:16	6:03	
Fire Station No. 76	7:40	7:37	
Citywide	6:29	6:17	

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

<sup>a</sup> Response times are based on January–November 2018 data.

Source: LAFD, FireStatLA, Station 27 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st= 441&year=2018, accessed December 26, 2018; LAFD, FireStatLA, Station 82 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=681&year=2018, accessed December 26, 2018; LAFD, FireStatLA, Station 41 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st= 496&year=2018, accessed December 26, 2018; LAFD, FireStatLA, Station 52 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=546&year=2018, accessed December 26, 2018; FireStatLA, Station 76 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=656& year=2018, accessed December 26, 2018; and LAFD, FireStatLA, Citywide Response Metrics for 2018, www.lafd.org/fsla/stations-map?year=2018, accessed December 26, 2018.

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.<sup>31</sup> The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.<sup>32</sup>

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 judgement for needs in an area. If the number of incidents in a 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

<sup>&</sup>lt;sup>31</sup> LADOT, Los Angeles Signal Synchronization Fact Sheet.

<sup>&</sup>lt;sup>32</sup> LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulleting No. 133, October 2008.

service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* 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 six buildings that comprise approximately 61,816 square feet of floor area. Existing uses include warehouse, office, and commercial uses. Primary vehicular access to the Project Site would be provided via two driveways off of Selma Avenue. One driveway would provide one-way ingress and egress for delivery trucks, while the second driveway would provide two-way ingress and egress for vehicular access to the Project's below-grade parking areas. The grocery store option would also include an additional driveway for delivery trucks to access a loading area off of Argyle Avenue.

## (3) Fire Water Infrastructure

As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, 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 the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC). Water service is currently provided to the Project Site via an existing 8-inch water main along Argyle Avenue and an existing 8-inch water line along Selma Avenue. The Project Site has two domestic water connections. A 2-inch domestic service is located on Argyle Avenue, approximately 178 feet south of Selma Avenue, and a 2-inch domestic service is located on Selma Avenue, approximately 168 feet west of El Centro Avenue.

According to the Utility Report, and based on correspondence with LADWP, there is no existing fire water service serving the Project Site, and there are no public fire hydrants along the property frontage. However, there are three public fire hydrants located near the Project Site. One fire hydrant is located on the west side of Argyle Avenue, approximately mid-way between Selma Avenue and Sunset Boulevard. A second fire hydrant is located on the north side of Selma Avenue near the intersection of Selma Avenue and El Centro Avenue. An additional fire hydrant also located on the north side of Selma Avenue, near the intersection of Selma Avenue and Argyle Avenue.

## (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.<sup>33</sup> 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 to mitigate fire hazard-related risks.<sup>34</sup> According to the City of Los Angeles Department of Building and Safety, 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.<sup>35</sup>

# 3. Project Impacts

## a. Thresholds of Significance

## (1) State CEQA Guidelines Appendix G

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, 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.

## (2) 2006 L.A. CEQA Thresholds Guide

The *L.A.* CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following criterion to evaluate fire protection:

<sup>&</sup>lt;sup>33</sup> City of Los Angeles, Department of City Planning, ZIMAS, Parcel Profile Report for 1546 North Argyle Avenue, http://zimas.lacity.org/, accessed December 26, 2018.

<sup>&</sup>lt;sup>34</sup> City of Los Angeles, Department of City Planning, ZIMAS, Parcel Profile Report for 1546 North Argyle Avenue, http://zimas.lacity.org/, accessed December 26, 2018.

<sup>&</sup>lt;sup>35</sup> 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.

• A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

In assessing impacts related to fire protection in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

## b. Methodology

Project impacts regarding fire services are evaluated by the LAFD on a project-byproject 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, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effect on fire protection and emergency medical services.

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.<sup>36</sup> To the extent a project generates demand for additional fire protection and emergency medical services that results in the need to construct new facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact needs to be evaluated within the project EIR and mitigated (if feasible), if found The ultimate determination of whether a project would result in a to be significant. significant impact to the environment related to fire protection and emergency medical services is determined by whether construction of new or expanded fire protection and emergency medical facilities would be needed. 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 Mitigated Negative Declaration.

<sup>&</sup>lt;sup>36</sup> <u>City of Hayward v. Board of Trustees of California State University</u> (2015) 242 Cal, App. 4<sup>th</sup> 833, 843.

## c. Analysis of Project Impacts

## (1) Project Design Features

The following Project Design Feature is proposed with regard to fire protection:

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

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

## (2) Project Impacts

Threshold (a): Would the Project 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?

#### (a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, 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 the Occupational Safety and Health Administration.<sup>37</sup> Additionally, in accordance with the

<sup>&</sup>lt;sup>37</sup> United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart (Footnote continued on next page)

provisions of the Occupational Safety and Health Administration, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.<sup>38</sup> 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 Section IV.G, Transportation, of this Draft EIR, while construction activities would primarily be contained within the 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. Construction delivery/haul trucks would generally access the Project Site via US-101 southbound to Gower Street and depart via Argyle Avenue to US-101 northbound. 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 Argyle Avenue, Gower Street, Sunset Boulevard, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, as discussed in Section IV.G, Transportation/Traffic, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, 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.G, 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

*F*, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show\_document? p\_table=STANDARDS&p\_id=10671, accessed December 26, 2018.

<sup>&</sup>lt;sup>38</sup> United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, 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 December 26, 2018.

necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Further, 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,<sup>39</sup> pursuant to California Vehicle Code (CVC) Section 21806. Moreover, although the average response times listed above in Table IV.F.1-2 on page IV.F.1-12 for LAFD fire stations in the Project vicinity and citywide do not meet the NFPA response time standards, LAFD has not formally adopted the NFPA standards or any other response time standards.

Based on the above, Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain adequate levels of service. 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 fire protection and emergency medical services addresses potential impacts associated with LAFD facilities and equipment, response distances, access, and the ability of the fire water infrastructure system to provide the necessary fire flows.

## (i) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 27, the "first-in" station for the Project Site, located approximately 0.7 mile southwest of the Project Site. As shown in Table IV.F.1-1 on page IV.F.1-10, Fire Station No. 27 is equipped with a task force truck and engine company, paramedic rescue ambulance, and EMT rescue ambulance, and has a staff of 15. As such, Fire Station No. 27 falls within the required 1.0-mile engine company and 1.5-mile truck company response distances from the Project Site and would be available to serve the Project in the event of an emergency. In addition, Fire Station No. 82 is equipped with an engine company and is also located 0.7 mile from the Project Site. Thus, Fire Station No. 82 would also fall within the required 1.0-mile engine company response distance from the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project Site and would be available to serve the Project as needed. Furthermore, as shown in Table IV.F.1-1, although located beyond the specified response distance requirements, Fire Station Nos. 41, 52, and 76 have been identified by the LAFD as capable of initial responses needed at the Project Site.

<sup>&</sup>lt;sup>39</sup> LAMC Section 11.01(j) excludes from the definition of "Sound Amplifying Equipment" the following: "Warning devices on emergency vehicles."

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by six buildings that comprise approximately 61,816 square feet of floor area. Existing uses include warehouse, office, and commercial uses. Based on employee generation rates developed by the Los Angeles Unified School District (LAUSD), these existing commercial uses are expected to result in approximately 168 employees.<sup>40</sup> The Project would construct a mixed-use development with 276 residential units and approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses under the Retail/Restaurant Option. Alternatively, under the Grocery Store Option, the Project would construct an approximately 27,000 square-foot grocery store in lieu of the proposed retail and restaurant uses. Under both options, with the increase in development density, the Project would generate an increase in the on-site service population within 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, applying the Census Bureau's household rate of 2.43 residents per multi-family dwelling unit, development of up to 276 units would result in a net increase of approximately 671 residents.<sup>41</sup> In addition, as further discussed in the Initial Study, the development scenario under the Grocery Store Option would generate the most employees as a result of the Project. Under this scenario, the Project would generate approximately 73 employees based on employee generation rates developed by LAUSD.<sup>42,43</sup> 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. In addition, since the Project Site would be located within the required response distance from

<sup>&</sup>lt;sup>40</sup> Based on Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. For existing commercial uses related to retail and print shop uses, the employee generation rate for "Neighborhood Shopping Center" (i.e., 0.00271 employee per square foot) is applied.

<sup>&</sup>lt;sup>41</sup> Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimate (2012–2016) per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, March 8, 2018.

<sup>&</sup>lt;sup>42</sup> Based on Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. For proposed grocery store uses, the employee generation rate for "Neighborhood Shopping Center" (i.e., 0.00271 employee per square foot) is applied.

<sup>&</sup>lt;sup>43</sup> For comparison purposes, the development scenario that includes 15,000 square feet of restaurant uses and 9,000 square feet of retail uses would generate fewer employees. Based on the employee generation rate for "Neighborhood Shopping Center" (i.e., 0.00271 employee per square foot), this scenario would generate approximately 65 employees.

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 not be required to be constructed with automatic fire sprinkler systems. Notwithstanding, 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 proposed buildings, which would reduce the demand placed on the LAFD.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for the Project would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new facilities.<sup>44</sup>

#### (ii) Response Distance, Emergency Access, and Response Times

Pursuant to LAMC Section 57.507.3.3, for land uses in the Industrial and Commercial category, which includes the Project, the required response distance from 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 0.7 southwest of the Project Site, and is equipped with a task force truck and engine company, paramedic rescue ambulance, and EMT rescue ambulance. In addition, Fire Station No. 82, also located approximately 0.7 mile northeast of the Project Site, is equipped with a single engine company and a paramedic rescue ambulance. 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 for both the commercial and residential components of the Project, including access for emergency vehicles, would be from Selma Avenue via two driveways. In addition, under the Grocery Store Option, a driveway would be provided on Argyle to allow truck access to a loading area off of Argyle 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's traffic study area. 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

<sup>&</sup>lt;sup>44</sup> Inter-departmental correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, of LAFD to Vincent Bertoni, Director of Planning, October 19, 2017.

Project Site is not considered substandard. As discussed in Section IV.G, Transportation, of this Draft EIR, traffic generated by the Project would not result in significant impacts to Project area intersections, including intersections along the City-designated disaster routes along Santa Monica Boulevard and Highland Avenue, based on the City of Los Angeles Department of Transportation criteria. 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, pursuant to CVC Section 21806. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times 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.

Overall, impacts with regard to response distance, emergency access, and response times would be less than significant.

## (iii) Fire Flow

As described in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, 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. The Project falls within the Industrial and Commercial category, which has a minimum 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. Additionally, hydrants must be spaced to provide adequate coverage of the building exterior.

As previously stated, the nearest fire hydrants to the Project Site are located along Argyle Avenue, near the intersection of Selma Avenue and El Centro Avenue, and near the intersection of Selma Avenue and Argyle Avenue. Specifically, one fire hydrant is located on the west side of Argyle Avenue, approximately mid-way between Selma Avenue and Sunset Boulevard. Another fire hydrant is located on the north side of Selma Avenue near the intersection of Selma Avenue and El Centro Avenue. An additional fire hydrant also located on the north side of Selma Avenue, near the intersection of Selma Avenue and Argyle Avenue. The results of the Information of Fire Flow Availability Report submitted to LADWP confirmed that the three fire hydrants can provide a simultaneous fire flow of 7,500 gpm. Based on preliminary discussion with the LAFD, the Project would likely require the installation of a new fire hydrant on Argyle Avenue in order to meet the minimum flow and pressure requirements and comply with the Industrial and Commercial land use standards. In addition, as discussed above, the Project would also install a fire sprinkler suppression system in accordance with Project Design Feature FIR-PDF-1. As such, the Project would comply with all LAFD and LADWP requirements regarding fire hydrant and fire sprinkler review and approval during the design and permitting phase of the Project. Therefore, impacts with regard to fire flow would be less than significant.

## (iv) Conclusion

Based on the analysis above, Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service and would not inhibit LAFD emergency response. Therefore, operation of the Project would not result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and emergency medical services. Impacts to fire protection and emergency medical services during Project operation would be less than significant, and no mitigation measures are required.

# 4. Cumulative Impacts

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, 41, 52, and 76. The Project, in conjunction with growth forecasted in the City through 2023 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection service, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2023 includes specific known development projects, growth that may be 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 discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 108 is a conservative assumption, as some of the related projects may not be built out by 2023 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 108 are fully built out by 2023, unless otherwise noted. Related Project No. 109 is

the Hollywood Community Plan Update, which once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2023, well before the Community Plan Update's horizon year. Moreover, 2023 is a similar projected buildout year as many of the 108 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

## a. Construction

Like the Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, similar to the Project, 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. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Should Project construction occur concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan, which would ensure that emergency access and traffic flow are maintained on adjacent right-of-ways. Since the Project would not require substantial narrowing of adjacent public right-of-ways that may be hazardous to roadway travelers, the Project would not have significant impacts on access and safety. Similar to the Project, each related project would implement similar design features during construction and would be subject to the City's routine construction permitting process, which includes a review by the LAFD to ensure that sufficient security measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and the related projects would not significantly impact LAFD response times within the Project Site vicinity as drivers of fire and 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, pursuant to CVC Section 21806. Finally, the Project in and of itself would not cause a significant impact to fire protection services during construction.

Based on the above, the Project's contribution to cumulative impacts on either fire protection services or emergency response during construction would not be cumulatively considerable, and cumulative impacts would be less than significant.

## b. Operation

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 27, 82, 41, 52, and 76. The increase in development and residential service populations from the Project, related projects, as well as other future development in the Hollywood Community Plan area would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services if the Project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects and other future development projects in the Hollywood Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project and other future development projects in the Hollywood Community Plan area would be required to comply with regulatory requirements related to fire protection and emergency medical services. In addition, the Project, related projects, and other future development projects in the Hollywood Community Plan area would be subject to the City's standard construction permitting process, which includes 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. Furthermore, given that the Project Site is located within an urban area, each of the related projects identified in the area, as well as other future developments, 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.<sup>45</sup>

Cumulative increases in demand for fire protection services due to related projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and

<sup>&</sup>lt;sup>45</sup> City of Los Angeles, Budget for the Fiscal Year 2017–18.

engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the Community Plan area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, 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 the use of a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration.<sup>46</sup> Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

With regard to cumulative impacts on fire protection, consistent with the *City of Hayward v. Board of Trustees of California State University* 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 of such potential future facilities, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection and emergency medical services would be less than significant.

Based on the above, the Project's contribution to cumulative impacts to fire protection and emergency services during operation would not be cumulatively considerable. As such, cumulative impacts on fire protection and emergency medical services during Project operation would be less than significant.

<sup>&</sup>lt;sup>46</sup> Although an EIR was prepared for the construction of Fire Station 39, the EIR concluded there would be no significant impacts. (Refer to Notice of Determination for Van Nuys Fire Station 39.)

# 5. Mitigation Measures

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

# 6. Level of Significance After Mitigation

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