

IV. Environmental Impact Analysis

I.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 services. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site and considers the following factors used by the Los Angeles Fire Department (LAFD) to determine the adequacy of fire protection for a given area: fire flow requirements; response distance from existing fire stations; and LAFD's judgment for needs in the area. Emergency access to the Project Site and surrounding uses is also considered. This analysis is based, in part, on information available on LAFD's website, written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, from the LAFD Bureau of Fire Prevention and Public Safety (April 30, 2018), included in Appendix H of this Draft EIR, and the *Utility Technical Report: Water, Wastewater, and Energy* (Utility Report), prepared for the Project by KPFF Consulting Engineers, dated October 26, 2018, which is included in Appendix L of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) Occupational Safety and Health Administration

The federal and California Occupational Safety and Health Administrations (OSHA and CalOSHA) 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.

(b) 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, 2017.¹ 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 2016 California Fire Code also went into effect on January 1, 2017.² 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.

(c) California Vehicle Code

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

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

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

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

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

stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety.... (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(d) 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 that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁴ 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.”⁵

(2) 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

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

⁵ *Ibid.*

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 of Los Angeles (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's 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.⁶ 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.⁷ 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.

⁶ *City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services.*

⁷ *City of Los Angeles General Plan Framework Element, p. 9-5.*

(d) Hollywood Community Plan

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.
- 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. The LAMC 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.⁸

⁸ 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 (Footnote continued on next page)

LAMC Section 57.106.5.2 specifically 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 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 are determined by the LAFD and 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 Industrial and Commercial areas with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. As determined by the LAFD (refer to Appendix H of this Draft EIR), the Project would be considered under the High Density Industrial and Commercial category, which has a minimum required fire flow of 12,000 gpm with a minimum residual water pressure of 20 pounds psi. As set forth in the LAMC and noted by the LAFD, sites considered under the High Density Industrial and Commercial category may also be required to provide an additional 2,000 gpm to 8,000 gpm where local conditions indicate that consideration must be given to simultaneous fires.⁹

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. As stated above, the Project would be considered under the High Density Industrial and Commercial category. Land uses in the High Density Industrial and Commercial category require one hydrant per 40,000 square feet of land with 300-foot distances between hydrants, and 4-inch by 4-inch double fire hydrants. Regardless of land

Code incorporates by reference portions of the 2013 edition of the California Fire Code and the 2012 edition of the International Fire Code.

⁹ *Written correspondence from Ralph M. Terrazas, LAFD Fire Chief, April 30, 2018. See Appendix H of this Draft EIR.*

use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

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 Table 57.507.3.3 provided in LAMC Section 57.507.3.3, the maximum response distance for land uses in the High Density Industrial and Commercial category from fire stations with an engine company is 0.75 mile, and the maximum response distance from fire stations with a truck company is 1 mile. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

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.¹⁰ All emergency plans, procedures, and evacuation signs must be completed and submitted to the LAFD for inspection and approval prior to implementation in accordance with Section LAMC 57.408.3. Additionally, 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. In addition, Section 57.4705 addresses specific fire safety requirements for new high-rises, including specific requirements related to an elevator system, vertical exit enclosures, and standby power for window washing equipment. In accordance with Section 57.4705.1.6, at least one elevator in each bank of elevators must be available for fire emergency service, and Section 57.4705.1.7 requires that at least one elevator car serving all building levels must be available for emergency use. Any new high-rise building must also include an automatic sprinkler system.

LAMC Section 57.4705.4 requires all high-rise buildings to provide a rooftop emergency helicopter landing facility (EHLF), unless certain life safety features, as specified in LAFD Requirement No. 10, are provided and approved by the Fire Marshal in compliance with two options.¹¹ Option 1 (EHLF Equivalency—HTLA) pertains to the provision of a Helicopter Tactical Landing Area (HTLA) in lieu of the emergency helicopter landing facility. An HTLA is defined by the LAFD as a “designated load bearing area with dimensions that will be less than those required for the load bearing area of an EHLF but with sufficient safety area around the HTLA to provide clearance for the helicopter.” LAFD Regulation No. 10 specifies HTLA and life safety feature requirements under different high-rise building height categories: over 75 feet, but less than 120 feet; over 120 feet, but less

¹⁰ LAMC Section 57.118.1.1 classifies high-rise buildings as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access.

¹¹ Los Angeles Fire Department, Office of the Fire Marshal, Los Angeles Fire Department Requirement No. 10: Emergency Helicopter Landing Facilities (EHLF) Requirements, revised November 17, 2014.

than 240 feet; over 240 feet, but less than 420 feet; and over 420 feet, but less than 1,000 feet. For Option 1, life safety features include:

- Two Fire Service Access Elevators
- Two-three stairways with roof access
- Enclosed elevator lobbies
- Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor

Option 2 (EHLF Equivalency—No EHLF and No HTLA) applies when all life safety elements included in Option 1 have been provided along with additional life safety features included in Option 2. For Option 2, the additional life safety features include:

- An automatic sprinkler system installed throughout the high-rise building. In light and ordinary hazard areas, other than parking garages, listed quick-response sprinklers, including extended coverage quick-response sprinklers, shall be used throughout the system. The National Fire Protection Agency (NFPA) 13 reduction to the hydraulic design area of operation for quick-response sprinkler systems shall not be permitted. Note: To meet the intent of this life safety feature it will typically require larger size branch lines for the automatic sprinkler system with quick response sprinkler heads.
- A Video Camera Surveillance System with cameras located in all Fire Service Access Elevator Lobbies and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft. LAFD video surveillance shall be usable from the LAFD's "fire control room" and installed with system cabling "survivability" requirements similar to NFPA Standard 72 for fire alarm systems. System cameras are required to be active during a fire alarm condition within the building.
- For high-rise buildings over 420 feet: egress stairways with a capacity, in inches, calculated by multiplying the occupant load served by a means of egress capacity factor of 0.3 inch per person. However, the capacity shall not be less than specified elsewhere in the building and fire codes.

(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.¹² 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.¹³

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.¹⁴ 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 jail, 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.¹⁵

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 2018–2020¹⁶

The Los Angeles Fire Department Strategic Plan 2018-2020, A Safer City 2.0, (LAFD's Strategic Plan) is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision. The LAFD's Strategic Plan builds upon the progress of the first Strategic Plan from 2015-2017, which

¹² City of Los Angeles Department of Public Works, Bureau of Engineering, *Proposition F, Facilities Bond*, www.eng.lacity.org/fire_bond, accessed September 13, 2019.

¹³ City of Los Angeles Department of Public Works, Bureau of Engineering, *Proposition F, Facilities Bond*, www.eng.lacity.org/fire_bond, accessed January 3, 2019.

¹⁴ 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*.

¹⁵ 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*.

¹⁶ LAFD, *Strategic Plan 2018–2020*.

resulted in the achievement of 70 percent of its goals. As provided in LAFD's Strategic Plan, 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 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 Services and Facilities

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.¹⁷ There are 106 neighborhood fire stations strategically located across the LAFD's 471-square-mile jurisdiction.¹⁸ At any given time, a total of 1,018 firefighters, including 270 paramedics, are on 24-hour duty.¹⁹ In addition, the LAFD is supported by 353 technical and administrative personnel.²⁰

As shown in Figure IV.I.1-1 on page IV.I.1-11, there are four LAFD fire stations located within 2 miles of the Project Site. The closest station to the Project Site is Fire Station No. 82, which is the designated "first in" station (i.e., station that would be first to respond), located approximately 0.6 mile northeast of the Project Site at 5769 W. Hollywood Boulevard.²¹ As shown in Table IV.I.1-1 on page IV.I.1-12, Fire Station No. 82 consists of a single engine company and paramedic rescue ambulance with six staff members.²²

¹⁷ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed September 17, 2019.

¹⁸ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed September 17, 2019.

¹⁹ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed September 17, 2019.

²⁰ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed September 17, 2019.

²¹ Written correspondence from Ralph M. Terrazas, LAFD Fire Chief, April 30, 2018. See Appendix H of this Draft EIR.

²² Written correspondence from Ralph M. Terrazas, LAFD Fire Chief, April 30, 2018. See Appendix H of this Draft EIR.

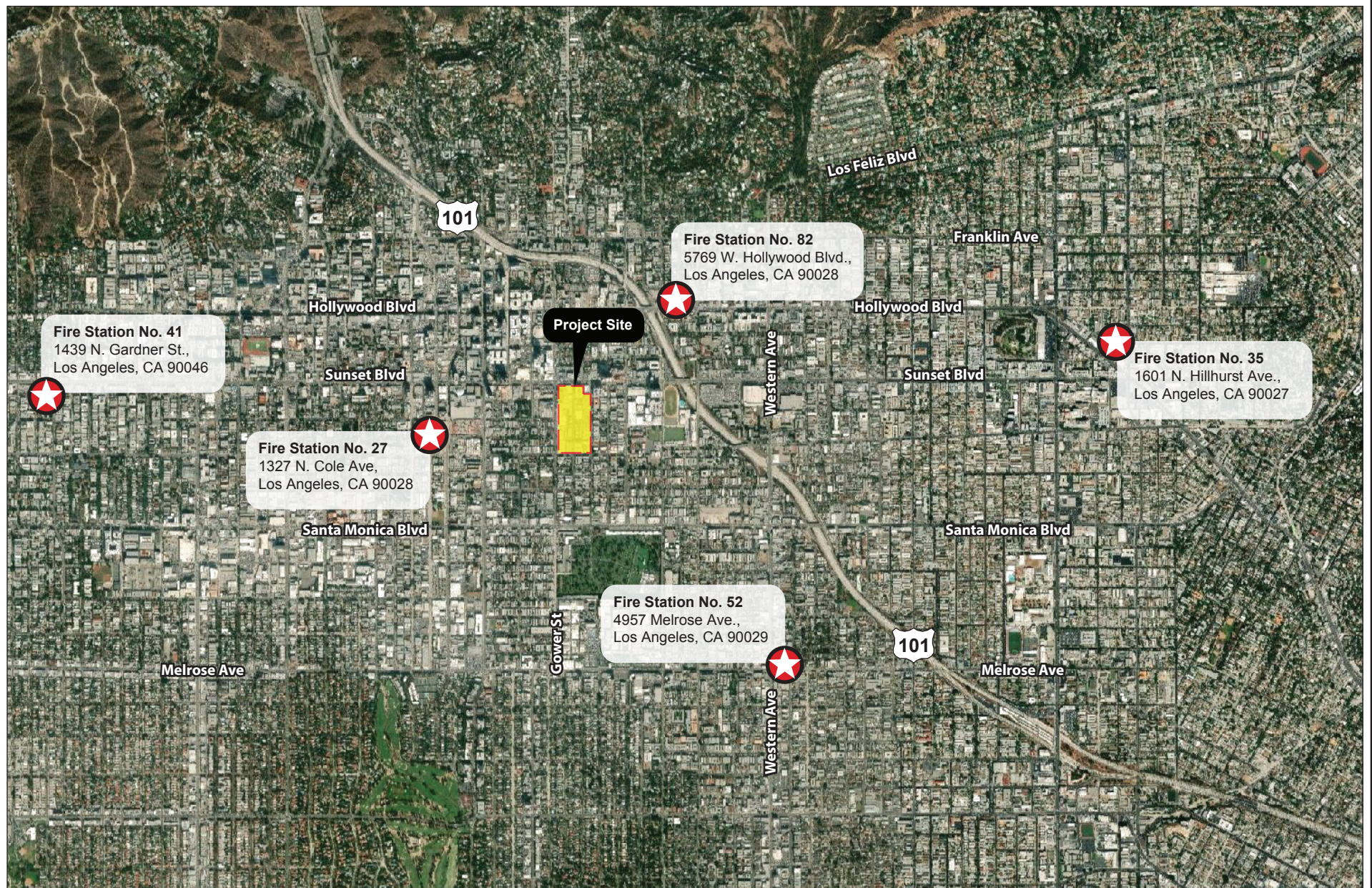


Figure IV.I.1-1
Fire Stations in the Vicinity of the Project Site

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

Station No., Location, and Community Served	Distance from Project Site	Equipment	Number of Staff
Fire Station No. 82 5769 W. Hollywood Blvd.	0.6 mile	<ul style="list-style-type: none"> • Engine Company • Paramedic Rescue Ambulance 	6
Fire Station No. 27 1327 N. Cole Ave.	0.9 mile	<ul style="list-style-type: none"> • Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Urban Search and Rescue 	14
Fire Station No. 52 4957 Melrose Ave.	1.7 miles	<ul style="list-style-type: none"> • Engine Company • Paramedic Rescue Ambulance 	6
Fire Station No. 41 1439 N. Gardner St.	1.9 miles	<ul style="list-style-type: none"> • Engine • Paramedic Rescue Ambulance • Brush Patrol 	6
Fire Station No. 35 1601 N. Hillhurst Ave.	2.1 miles	<ul style="list-style-type: none"> • Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Brush Patrol 	10
<i>Source: Written correspondence from Ralph M. Terrazas, LAFD Fire Chief, April 30, 2018. See Appendix H of this Draft EIR.</i>			

As provided in the written correspondence from the LAFD, included in Appendix H of this Draft EIR, secondary fire stations that serve the Project Site include Fire Station No. 27, Fire Station No. 52, Fire Station No. 41, and Fire Station No. 35. Fire Station No. 27 is located approximately 0.9 mile west of the Project Site at 1327 North Cole Avenue. Fire Station No. 27 consists of a task force, a paramedic rescue ambulance, a basic life support rescue ambulance, urban search and rescue, and 14 staff members. Fire Station No. 52 is located approximately 1.7 miles south of the Project Site at 4957 Melrose Avenue. Fire Station No. 52 consists of an engine company, a paramedic rescue ambulance, and six staff members. Fire Station No. 41 is located approximately 1.9 miles west of the Project Site at 1439 North Gardner Street and consists of an engine company, a paramedic rescue ambulance, brush patrol, and six staff members. Fire Station No. 35 is located approximately 2.1 miles east of the Project Site at 1601 N. Hillhurst Avenue and consists of an assessment light force, a paramedic rescue ambulance, a basic life support rescue ambulance, brush patrol, and 10 staff members.

The response times shown in Table IV.I.1-2 on page IV.I.1-13 are provided for informational purposes since LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA)

**Table IV.I.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. 82	6:41	6:22
Fire Station No. 27	6:28	5:59
Fire Station No. 52	6:38	6:35
Fire Station No. 41	6:56	7:29
Fire Station No. 35	6:05	5:42
Citywide	6:39	6:22
<p><i>Response times are based on January 2019–August 2018 data.</i></p> <p><i>Source: LAFD, FireStatLA, Fire Station 82 Response Metrics, www.lafd.org/fsla/stations-map?st=681&year=2019, accessed September 17, 2019; LAFD, FireStatLA, Fire Station 27 Response Metrics, www.lafd.org/fsla/stations-map?st=441&year=2019, accessed September 17, 2019; LAFD, FireStatLA, Fire Station 52 Response Metrics, www.lafd.org/fsla/stations-map?st=546&year=2019, accessed September 17, 2019; LAFD, FireStatLA, Fire Station 41 Response Metrics, www.lafd.org/fsla/stations-map?st=496&year=2019, accessed September 17, 2019; LAFD, FireStatLA, Fire Station 35 Response Metrics, www.lafd.org/fsla/stations-map?st=466&year=2019, accessed September 17, 2019; and LAFD FireStatLA, City Wide Response Metrics, www.lafd.org/fsla/stations-map?year=2019, accessed September 17, 2019.</i></p>		

standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.²³

Roadway congestion, intersection level of service (LOS), 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 a path of an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.²⁴ The City has over 205 miles of major arterial routes that are equipped with FPS.²⁵ According to the LAFD, although response times can be considered to assess the

²³ 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 emergency medical service and fire suppression incidents.

²⁴ LADOT, *Los Angeles Signal Synchronization Fact Sheet*.

²⁵ LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, Bulletin No. 133, October 2008.

adequacy of fire protection and emergency medical services, LAFD utilizes 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 given area increases, it is the LAFD's responsibility to assign new staff and equipment, 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 is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, is available via existing driveways on Sunset Boulevard at North Beachwood Drive and along Gordon Street through gated entries. Emergency and limited access is also provided along Fountain Avenue.

(3) Fire Water Infrastructure

As discussed in Section IV.L.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). There are 18 existing fire hydrants surrounding the Project Site, five of which are private and thirteen of which are public. A summary table of the hydrants' locations is provided in the Utility Report, provided in Appendix L of this Draft EIR.

(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.²⁶ 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 reduce fire hazard-related risks.²⁷

²⁶ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed September 17, 2019.

²⁷ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed September 17, 2019.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with the State CEQA Guidelines Appendix G, the 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 (i.e., fire) 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.

For this analysis the Appendix G Threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold question.

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

- 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.

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 and emergency medical 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 in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection 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 an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection 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 acre and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Sections 15301 or 15332.

c. Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.J, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, a Construction Management Plan would be implemented as part of the Project that would include provisions for maintaining emergency access to the Project Site during construction.

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

The Project would involve standard construction techniques and is an infill project within a highly urbanized area that is already fully served by fire protection services. While construction could 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, construction personnel would be required to comply with OSHA, which has developed safety and health provisions set forth in the Safety and Health Regulations for Construction for implementation during construction; i.e., 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.²⁸ Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.²⁹ Project construction would also occur in compliance with all applicable federal, state, and local requirements (e.g., Emergency Planning and Community Right-to Know Act, Health and Safety Code Section 25531, and the Resource Conservation and Recovery Act, etc.) 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 activities in the surrounding roadways. Specifically, as discussed in Section IV.J, 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. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, as discussed in Section IV.J, Transportation, of this Draft EIR, construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. A Construction Management Plan would also be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.J,

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 September 17, 2019.*

²⁹ *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 September 17, 2019.*

Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction. 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, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Project construction would not require a new fire station or the expansion of an existing facility in order to maintain service. Therefore, impacts to fire protection services during Project construction would be less than significant.

(b) Operation

(i) Facilities and Equipment

During construction and operation, the Project Site is expected to continue to be served by Fire Station No. 82, the “first-in” station for the Project Site, located approximately 0.6-mile northeast of the Project Site. As summarized in Table IV.I.1-1 on page IV.I.1-12, Fire Station 82 consists of a single engine company, a paramedic rescue ambulance, and six staff members. Pursuant to LAMC Section 57.507.3.3, land uses in the High Density Industrial and Commercial category, such as the Project, require a response distance of 0.75 from a fire station with an engine company and a response distance of 1 mile from a truck company. Fire Station No. 82, which consists of an engine company, a paramedic rescue ambulance, and six staff, is therefore within the required 0.75-mile distance. In addition, in the event Fire Station No. 82 is unable to respond, Fire Station Nos. 27, 52, 41, and 35, are located approximately 0.9 mile west, 1.7 miles south, 1.9 miles west, and 2.1 miles east of the Project Site, respectively. The LAFD has determined fire protection (based on the response distance from existing fire stations criteria) to be adequate.³⁰

As discussed in Section II, Project Description, of this Draft EIR, the Project would demolish 160,611 square feet of existing floor area, consisting of 125,521 square feet of

³⁰ Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, April 30, 2018.

creative office floor area, 29,444 square feet of production support floor area, and 5,646 square feet of sound stage floor area, as shown in Figure II-4 in Section II, Project Description, as well as remove the approximately 1,400 square feet of existing service areas. The Project would develop 627,957 square feet of floor area, including 599,335 square feet of creative office space, 27,172 square feet of production support space, and a 1,450-square-foot bicycle parking facility. The Project would result in a net increase of approximately 467,346 square feet of floor area and would generate approximately 1,869 employees.³¹ As the Project would increase the building area and daytime population of the Project Site compared to existing conditions, the Project would increase the demand for LAFD fire protection services. However, the proposed uses would be similar to existing uses within the Sunset Gower Studios and would be expected to generate a range of fire service calls similar to what occurs under existing conditions. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site.

As described in Section II, Project Description, of this Draft EIR, the Project would include buildings ranging in height from 89 feet to 300 feet. Thus, the Project is required by LAMC Section 57.4705.4 to provide an emergency helicopter landing facility, as described above in Subsection 2.a.(2)(e), or to implement one of two alternate options to an EHLF.³² At this time, the Applicant anticipates providing an emergency helicopter landing facility in accordance with LAMC Section 57.4705.4. 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, including as required by LAFD. These requirements are listed in the written correspondence in Appendix H of this Draft EIR. 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.

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 that would reduce the demand on

³¹ *Employee generation rates of four employees per 1,000 square feet of floor area based on Applicant experience with studio projects of similar scope.*

³² *LAMC Section 57.118.1.1 classifies high-rise buildings as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access.*

LAFD facilities and equipment resulting from the Project. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. 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, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (refer to 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). **Given these procedures and policy directives, as well as LAFD's continued evaluation of existing fire facilities, Project impacts with regard to LAFD facilities and equipment would be less than significant.**

(ii) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site, including emergency vehicle access, is provided along Sunset Boulevard at North Beachwood Drive and along Gordon Street through gated entries. Emergency and limited access is also available along Fountain Avenue. The Project's driveways and internal circulation would be designed to meet 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 confirmed 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 Section 57.118 of the LAMC, 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. Furthermore, drivers of emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. **Overall, emergency access to the Project Site and surrounding area would be maintained, and impacts with regard to emergency access would be less than significant.**

(iii) Fire Flow

As described in Section IV.L.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 Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Appendix H of this Draft EIR, the Project falls within the

High Density Industrial and Commercial category, which has a minimum required fire flow of 12,000 gpm with a minimum residual water pressure of 20 pounds psi.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. Based on the completed IFFAR (see Exhibit 5 of the Utility Report included in Appendix L of this Draft EIR), the nine existing public fire hydrants within and adjacent to the Project Site flowing simultaneously can deliver combined flows of 12,000 gpm, which meets the required fire flow for the Project Site. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified for the Project in accordance with LAMC Section 57.507.3.1.

As set forth in LAMC Section 57.507.3.2, land uses considered under the High Density Industrial and Commercial category require one hydrant per 40,000 square feet of land with 300-foot distances between hydrants, and 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. As previously described, there are currently 18 existing fire hydrants within and adjacent to the Project Site: four on North Beachwood Drive, one on Fountain Avenue, three on Gordon Street, six on Sunset Boulevard, and four on N. Gower Street. Based on consultation with LADWP, LADWP's initial review of the Project determined that no additional fire hydrants would be required to provide adequate fire coverage. If later required by the LAFD during their fire/life safety plan review, 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. Furthermore, in accordance with LAMC Section 57.4705.4, the Project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting of the Project, and would reduce or eliminate the public hydrant demands.

(iv) Conclusion

Based on the analysis above, the Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Moreover, the LAFD has indicated that there are no plans to increase LAFD staffing or resources in those areas which will serve the Project. Nor does the LAFD have a capital improvement plan or facilities master plan that calls for the construction of a fire facility in the immediate vicinity of the Project Site. **Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of**

which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection services are the service areas of Fire Station Nos. 82, 27, 52, 41, and 35. The Project, in conjunction with growth forecasted in the City through 2028 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2028 includes 104 known development projects, growth that may be projected as a result of the Hollywood Community Plan Update (Related Project No. 105), as well as general ambient growth projected, as described in Section III, Environmental Setting, of this Draft EIR.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by 104 known related projects is a conservative assumption, as some of the related projects may not be built out by 2028, may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that all 104 related projects are fully built out by 2028, unless otherwise noted. In addition, the Hollywood Community Plan Update, once adopted, will be a long-range plan designed to guide growth in the Community Plan Area through 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 built out by 2028, well before the Hollywood Community Plan Update's horizon year. Moreover, it is expected that some of the related projects would also be built in 2028 (the Project's projected buildout year). 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 Hollywood Community Plan Update upon its adoption.

A number of the related projects identified in Section III, Environmental Setting, of this Draft EIR, fall within the service areas of Fire Station Nos. 82, 27, 52, 41, and 35. With regard to response distance, the related projects would be located within an urbanized area with existing fire protection services and would most likely be located within the required distance from a fire station. If not located within the required distance from a fire station, LAFD would identify measures required to be implemented to ensure adequate fire protection services. For example, each related project and other future development that exceeds the maximum applicable LAMC response distance standards would be required to install systems which compensate for the distance, such as automatic fire sprinkler systems. The related projects and other future development projects in the Hollywood Community Plan Area would also be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. In addition, related projects 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.

The Project and related projects 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.³³ 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 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 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.

Additionally, 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 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

³³ *City of Los Angeles, Budget for the Fiscal Year 2018–19.*

construction in the area impacted by this Project either because of this Project or other projects in the service 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 a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.³⁴ 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.

Based on the above, development of the Project and related projects would not result in significant cumulative impacts associated with an increase in fire protection services demand that would require a new fire station, the construction of which could cause significant environmental impacts. **Therefore, cumulative impacts on fire protection services would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to fire protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

³⁴ Although an EIR was prepared for the construction of LAFD Fire Station No. 39, the EIR concluded there would be no significant impacts. See Notice of Determination for Van Nuys Fire Station 39.