IV. Environmental Impact Analysis

I.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection 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 services and whether increased demands would create the need for new or expanded facilities: 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 (July 8, 2020) included in Appendix M of this Draft EIR; and the *1360 Vine Street—Mixed Use Residential, Utility Infrastructure Technical Report: Energy, Water, and Wastewater* (Utility Report), prepared for the Project by KPFF Consulting Engineers, dated May 2021, which is included in Appendix F of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding Fire Protection at the federal, state, and local levels. Described below, these include:

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency Aid System
- California Vehicle Code

- California Constitution Article XIII, Section 35
- California Governor's Office of Emergency Services
- City of Los Angeles Charter
- City of Los Angeles General Plan Safety Element
- Community Plan
- Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

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

(b) Federal Emergency Management Act

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

(c) Disaster Mitigation Act of 2000

The Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Section 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

(2) State

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR, Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered

by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.[1] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2019 California Fire Code also went into effect on January 1, 2020.[2] Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.[3]

(b) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the California Governor's Office of Emergency Services (Cal OES) and authorized it to prepare a Standard Emergency Management System (SEMS) program (Gov. Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below). California Emergency Management Agency (Cal-EMA) maintains oversight of the state's mutual aid system.

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

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

3 *LAFD, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.*

(c) California Fire Service and Rescue Emergency Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the Cal OES Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[4] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the state, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.[5]

(d) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.[6] This section of the CVC states the following:

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

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[4] *Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised 4/2019.*

[5] *LAFD, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.*

[6] *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.*

(e) 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 that cities have "a constitutional obligation to provide adequate fire protection services".

(3) City of Los Angeles

(a) City of Los Angeles Charter

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

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the 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.[7] 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

[7] *City of Los Angeles, General Plan Framework, Chapter 9: Infrastructure and Public Services.*

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 relevant General Plan fire protection goals, objectives, and policies are included in Table IV.I.1-1 on page IV.I.1-8. The City of Los Angeles General Plan Safety Element, discussed below, recognizes that most jurisdictions rely on emergency personnel (i.e., 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.[8] 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 goals, objectives, and policies related to the City's response to hazards and natural disasters, including fires, as shown in Table IV.I.1-2 on page IV.I.1-9. 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 0.5 miles south of the Project Site, and Highland Avenue, located approximately 0.55 mile to the west.[9]

(d) Hollywood Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to police protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

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[8] *City of Los Angeles, General Plan Framework, p. 9-5.*

[9] *City of Los Angeles General Plan Safety Element, Exhibit H, adopted by the City Council, November 26, 1996.*

Table IV.I.1-1
Relevant General Plan Fire Protection Goals, Objectives, and Policies—Framework Element: Chapter 9, Infrastructure and Public Services

Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
Policy 9.17.2	Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Policy 9.17.4	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes, or considering discretionary land use permits.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.

Source: City of Los Angeles, 2001.

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

Table IV.I.1-2
Relevant Goals, Objectives, and Policies—Safety Element

Goal 2	A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Response: Develop, implement, and continue to improve the City's ability to respond to emergency events. [All EOO emergency response programs and all hazard mitigation and disaster recovery programs related to protecting and reestablishing communications and other infrastructure, service and governmental operations systems implement this policy.]
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.] The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress. The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 gpm would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more gpm, not less than 3 engine companies and 2 truck companies. These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster. [All EOO recovery programs involving cooperative efforts between entities implement this policy.]

Source: City of Los Angeles, 2001.

- 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.[10]

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.

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.

LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

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[10] *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.*

The LAMC classifies high-rises as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access. LAMC Section 57.118.1.1 requires that all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) must include fire/life safety reviews by the Department of Building and Safety and LAFD.

LAMC Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

LAMC Section 57.4704.4.3.1 of the LAMC requires that the Smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

LAMC Section 57.4705.1.6 requires there must be at least one elevator which shall be available for fire EMS and shall have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floors. The elevator or elevators must be interconnected with the standby power.

LAMC Section 57.4705.4 requires all high-rise buildings to provide a rooftop emergency helicopter landing facility, unless certain life safety features, as specified by LAFD Requirement No. 10, are provided.[11]

The LAMC also addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low

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

density residential areas to 12,000 gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. The Project proposes to construct a mixed-use development comprised of residential and commercial uses. According to the LAFD, the Project falls within the Industrial and Commercial land use category, which requires fire water flow of 6,000 to 9,000 gpm from four to six adjacent hydrants flowing simultaneously with a residual pressure of 20 psi.

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 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on 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 land use 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.

(f) City of Los Angeles Propositions F and Q

Proposition F, the City Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 19 new or replacement neighborhood fire/paramedic stations and an Emergency Air Operations and Helicopter Maintenance Facility, for a total of 20 Proposition F projects.[12] As reported in November

[12] *City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, https://eng.lacity.org/fire_bond, accessed November 11, 2021.*

2019, BOE completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.[13]

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition allocated $600 million to renovate, improve, expand and construct public safety (i.e., police, fire, 911, paramedic) facilities.[14] Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five police stations, replacement of one police station and jail, construction of two bomb squad facilities, replacement of one jail, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of the Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities.[15] As part of Proposition Q, the renovation of 80 fire stations was completed in May 2014.[16]

(g) Measure J

Measure J, which was approved by voters at the November 7, 2006, General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. 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 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres.

(h) Los Angeles Fire Department Strategic Plan 2018–2020[17]

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

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[13] *City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 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] *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.*

[17] *LAFD, Strategic Plan 2018–2020, A Safer City 2.0, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed November 11, 2021.*

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. As of February 2022, the Strategic Plan 2018-2020 is still the most current.

b. Existing Conditions

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

The LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.[18] A total of 1,018 firefighters are always on duty at fire department facilities citywide, including the 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction.[19]

As shown in Figure IV.I.1-1 on page IV.I.1-15, four LAFD fire stations identified by the LAFD are located within a 2-mile radius of the Project Site, and one fire station is located beyond 2 miles. The closest station to the Project Site is Fire Station No. 27, which is the designated "first in" station, located approximately 0.4 mile west of the Project Site at 1327 North Cole Avenue.[20] As shown in Table IV.I.1-3 on page IV.I.1-16, Fire Station No. 27 consists of a task force truck and engine company, paramedic rescue ambulance, basic life support (BLS) rescue ambulance, Urban Search and Rescue apparatus, and a staff of 15.[21] The Project Site is located within the required response distance from a fire station with an engine and a truck company.

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[18] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed November 11, 2021.*

[19] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed November 11, 2021.*

[20] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

[21] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

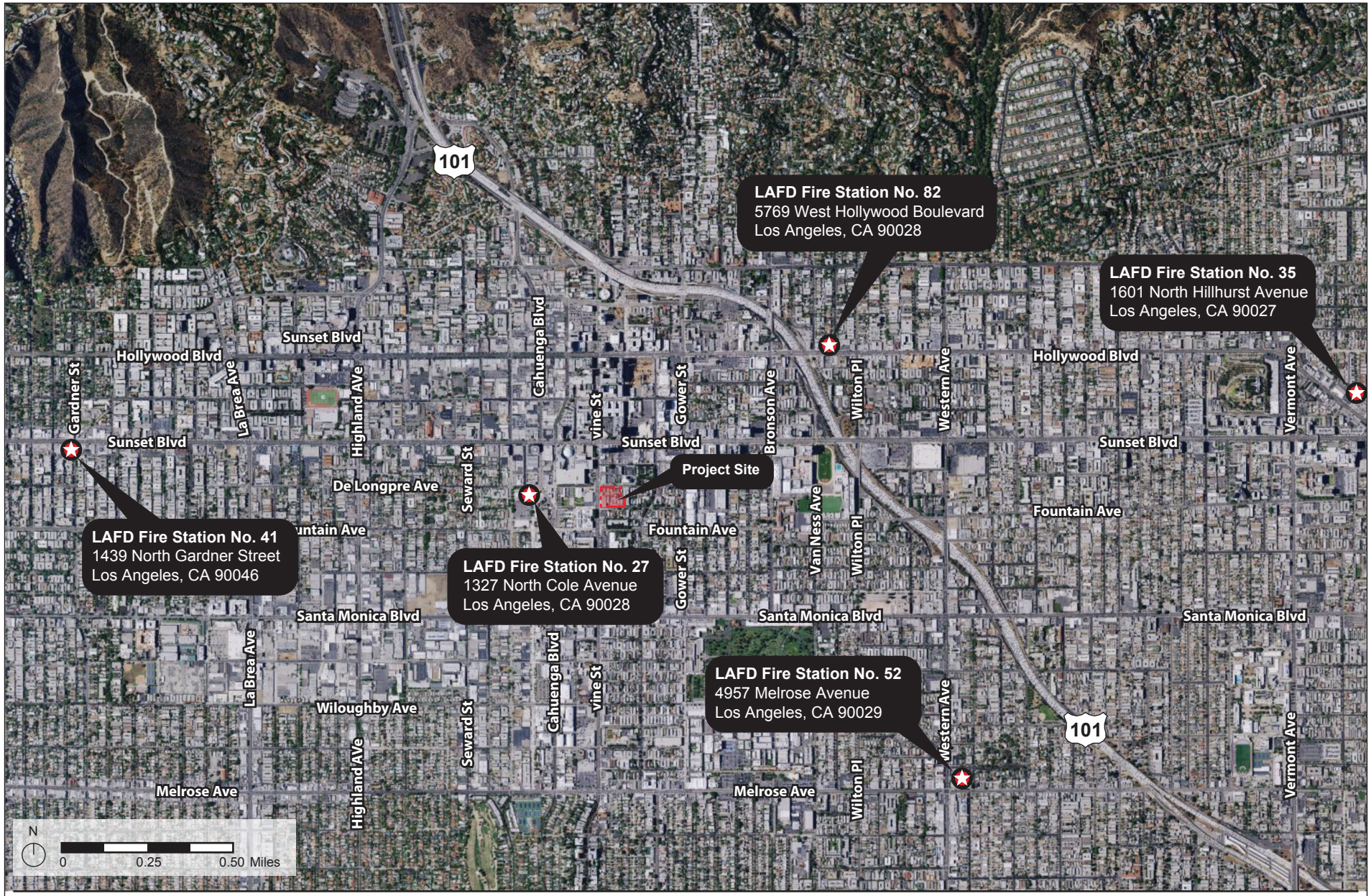

Figure IV.I.1-1
Fire Stations Serving the Project Vicinity

Source: Apple Maps, 2017.

Table IV.I.1-3
Los Angeles Fire Department Fire Stations Located in the Project Vicinity

Fire Station No.	Distance from Project Site	Equipment	Staffing
Fire Station No. 27 1327 North Cole Avenue Los Angeles, CA 90028	0.4 mile	• Task Force • Paramedic Rescue Ambulance • Basic Life Support (BLS) Rescue Ambulance • Urban Search and Rescue	15
Fire Station No. 82 5769 West Hollywood Boulevard Los Angeles, CA 90028	1.0 mile	• Engine • Paramedic Rescue Ambulance	6
Fire Station No. 41 1439 North Gardner Avenue Los Angeles, CA 90046	1.8 miles	• Engine • Paramedic Rescue Ambulance • Brush Patrol	4
Fire Station No. 52 4957 Melrose Avenue Los Angeles, CA 90029	1.9 miles	• Engine • Paramedic Rescue Ambulance	7
Fire Station No. 35 1601 North Hillhurst Avenue Los Angeles, CA 90027	2.5 miles	• Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Brush Patrol	12

A Light Force is comprised of a truck company running with a single engine. A Task Force is comprised of a truck company running with two engines.

Source: Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020 (refer to Appendix M of this Draft EIR); LAFD, Apparatus, www.lafd.org/about/about-lafd/apparatus, accessed November 11, 2021..

As identified by the LAFD and shown in Table IV.I.1-3, secondary fire stations that serve the Project Site include Fire Station Nos. 82, 41, 52, and 35. Fire Station No. 82 is located approximately 1.0 mile northeast of the Project Site at 5769 West Hollywood Boulevard and consists of an engine, paramedic rescue ambulance, and a staff of six.[22] Fire Station No. 41 is located approximately 1.8 miles west of the Project Site at 1439 North Gardner Street and consists of an engine, paramedic rescue ambulance,

[22] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

brush patrol, and a staff of four.[23] Fire Station No. 52 is located approximately 1.9 miles southeast of the Project Site at 4957 Melrose Avenue and consists of an engine, paramedic rescue ambulance, and a staff of seven.[24] Fire Station No. 35 is located approximately 2.5 miles east of the Project Site at 1601 North Hillhurst Avenue and consists of an assessment light force, paramedic rescue ambulance, BLS rescue ambulance, brush patrol, and a staff of 12.[25]

Specific operational response times for these stations in 2020 are shown in Table IV.I.1-4 on page IV.I.1-18. For the first-in station, Fire Station No. 27, the average operational response times were as follows for specific types of emergencies: emergency medical service incidents—6 minutes 37 seconds; non-emergency medical services—5 minutes 54 seconds; critical advanced life support (ALS) incidents—5 minutes 36 seconds; and structure fires—4 minutes 43 seconds.[26] As shown in the table, response times can differ between fire stations. In comparison, Citywide average operational response times were as follows: emergency medical service incidents—6 minutes 55 seconds; non-emergency medical services—6 minutes 33 seconds; critical ALS incidents—5 minutes and 58 seconds; and structure fires—5 minutes and 9 seconds in 2021.[27]

However, LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response.[28] Roadway congestion, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles

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[23] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

[24] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

[25] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

[26] *LAFD, FireStatLA, Fire Station 27 Response Metrics for 2021, accessed January 10, 2022.*

[27] *LAFD, FireStatLA, City Wide Response Metrics for 2021, http://lafd.org/fsla/stations-map?year=2021, accessed January 10, 2022.*

[28] *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.*

Table IV.I.1-4
Average Operational Fire Response Times (2021)

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)	Average Response Time to Critical ALS (Minutes:Seconds)	Average Response Time to Structure Fire[a] (Minutes:Seconds)
Fire Station No. 27	6:37	5:54	5:36	4:43
Fire Station No. 82	6:57	6:35	5:58	4:52
Fire Station No. 41	7:05	6:56	5:54	5:51
Fire Station No. 52	6:28	5:47	5:29	4:36
Fire Station No. 35	6:09	5:54	5:22	4:42
Citywide	6:55	6:33	5:58	5:09

[a] *Response times are based on January–December 2021 data.*

Source: LAFD, FireStatLA, Fire Station 27 Response Metrics for 2021, http://lafd.org/fsla/stations-map?station=27&year=2021, accessed January 10, 2022; LAFD, FireStatLA, Fire Station 82 Response Metrics for 2021, http://lafd.org/fsla/stations-map?station=82&year=2021, accessed January 10, 2022; LAFD, FireStatLA, Fire Station 41 Response Metrics for 2021, http://lafd.org/fsla/stations-map?station=41&year=2021, accessed January 10, 2022; LAFD, FireStatLA, Fire Station 52 Response Metrics for 2021, http://lafd.org/fsla/stations-map?station=52&year=2021, accessed January 10, 2022; LAFD, FireStatLA, Fire Station 35 Response Metrics for 2021, http://lafd.org/fsla/stations-map?station=35&year=20201, accessed January 10, 2022; LAFD, FireStatLA, City Wide Response Metrics for 2021, http://lafd.org/fsla/stations-map?year=2021, accessed January 10, 2022.

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.[29] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[30]

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

[29] *LADOT, Los Angeles Signal Synchronization Fact Sheet.*

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

potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board 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

All of the adjacent roadways may be used to access the Project Site. Vehicular access is currently available via existing driveways on Afton Place and De Longpre 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). Water service is currently provided to the Project Site via a 10-inch water main in Vine Street, an 8-inch water main in De Longpre Avenue, and a 4-inch water main in Afton Place. The Project Site has multiple domestic water connections along Vine Street, De Longpre Avenue, and Afton Place. There is an existing LAFD connection to charge fire sprinklers on the building face along Vine Street, and there is an existing 4-inch fire service along Vine Street.[31] In addition, there are six existing public fire hydrants in the vicinity of the Project Site. Two hydrants are located along De Longpre Avenue, and the remaining four are located along Homewood Avenue, Leland Way, Fountain Avenue, and Afton Place.

(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 or Fire District No. 1.[32]

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[31] *KPFF, Inc., 1360 Vine St—Mixed Use Residential, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021. Refer to Appendix F of this Draft EIR.*

[32] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for the Project Site.*

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to fire protection services 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.

In assessing impacts related to fire protection services in this section, the City will use Appendix G as the thresholds of significance. The factors and considerations identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate fire protection services:

- 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 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 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 time, and 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.[33] Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this Draft EIR. The ultimate determination of whether there is a significant impact related to fire protection and emergency medical services will result from the construction of new or expanded fire protection and emergency medical facilities. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332, Negative Declaration, or Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

c. Project Design Features

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9) and the Fire Code (Chapter 7); and Section 57.507.3.1 of the LAMC regarding fire flow requirements. The following project design feature is proposed with regard to fire protection.

Project Design Feature FIR-PDF-1: Automatic fire sprinkler systems will be installed in the rehabilitated bungalows.

Additionally, as discussed in Section IV.J, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-2, the Applicant would implement a Construction Traffic Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development options—the Residential Option and the Office Option.

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

The Residential Option would develop a new high-rise building with four levels of subterranean parking consisting of up to 429 new residential units, including 36 units designated for Very Low Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units. The new building would be 360 feet 4 inches in height when accounting for rooftop mechanical equipment.

The Office Option would develop a new high-rise building with eight levels of subterranean parking with approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the proposed building, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units. The new building would be 303 feet when accounting for rooftop mechanical equipment.

The following analysis accounts for both development options and the term "Project" is used to describe all development scenarios unless stated otherwise.

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 (i.e., fire), the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires 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, OSHA has developed safety and health provisions for implementation during construction, which are set forth in 29 CFR, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the OSHA. Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be

maintained on-site. 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.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. 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 Sunset Boulevard and Vine Street, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, 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 morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-2 in Section IV.J, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Worksite traffic control plan(s), approved by LADOT, would also be implemented to route vehicular traffic, bicyclists, and pedestrians around any parking lane and/or sidewalk closures. The Project would also employ temporary traffic controls to control traffic movement during temporary traffic flow disruptions. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant. Moreover, although the average response times listed above in Table IV.I.1-4 on page IV.I.1-18 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 and the current average response times would not be considered deficient.

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 service, the construction of which would cause significant environmental impacts. 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 addresses potential impacts associated with LAFD facilities and equipment, response distances and access, and the ability of the fire water infrastructure system to provide the necessary fire flows.

(i) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 27, the "first-in" station for the Project Site, located approximately 0.4 miles west of the Project Site. As shown in Table IV.I.1-3 on page IV.I.1-16, Fire Station No. 27 is equipped with a task force truck and engine company, paramedic rescue ambulance, BLS rescue ambulance, Urban Search and Rescue apparatus, and a staff of 15.[34]

In addition, Fire Station Nos. 82, 41, and 52, which are located within 2 miles of the Project Site, would continue to be available to serve the Project Site in the event of an emergency. As described above, Fire Station No. 82 is located approximately 1.0 mile northeast of the Project Site at 5769 West Hollywood Boulevard and consists of an engine, paramedic rescue ambulance, and a staff of six. Fire Station No. 41 is located approximately 1.8 miles west of the Project Site at 1439 North Gardner Street and consists of an engine, paramedic rescue ambulance, brush patrol, and a staff of four. Fire Station No. 52 is located approximately 1.9 miles southeast of the Project Site at 4957 Melrose Avenue and consists of an engine, paramedic rescue ambulance, and a staff of seven. Furthermore, the LAFD has identified Fire Station No. 35 as capable of serving the Project Site in the event of an emergency. Fire Station No. 35 is located approximately 2.5 miles east of the Project Site at 1601 North Hillhurst Avenue and consists of an assessment light

[34] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

force, paramedic rescue ambulance, BLS rescue ambulance, brush patrol, and a staff of 12.[35]

As the Project would generate a residential and/or employee population, the Project would increase the demand for LAFD fire protection. The proposed uses would be expected to generate a range of fire service calls, including kitchen/house fires, garbage bin fires, car fires, electrical fires, etc. These types of fires would be adequately suppressed with the fire equipment typically found at fire stations. 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. In addition, 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 a fire station with an engine and 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 would include the installation of automatic fire sprinklers in the new building and rehabilitated bungalows, which would reduce the demand placed on the LAFD. Furthermore, in compliance with LAMC Section 57.4705.4, the Project would provide a rooftop emergency helicopter landing facility or, alternatively, would comply with the specific requirements set forth by LAFD Requirement No. 10 such as additional life safety features related to elevators, stairways, roof access, and automatic sprinklers. These alternative life safety features would be reviewed and approved by LAFD.

As such, 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 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

[35] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

with the fire protection-related goals, objectives, and polices set forth in the Framework Element, the Safety Element, and the Community Plan, as listed in the regulatory framework above, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 1 of the Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). **Therefore, given LAFD's fire/life safety plan review, LAFD's fire/life safety inspection, and LAFD's continued evaluation of existing fire facilities, the Project 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, the construction of which would cause significant environmental impacts.**

(ii) Response Distance and Emergency Access

As discussed above, Fire Station No. 27, located at 1327 North Cole Avenue, is approximately 0.4 mile west 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, BLS rescue ambulance, Urban Search and Rescue apparatus, and a staff of 15.[36] In addition, Fire Station No. 82, located approximately 1.0 mile northeast of the Project Site, is equipped with an engine. Therefore, based on the LAMC criteria regarding response distance, the Project would fall within the LAFD's maximum prescribed response distances from a fire station with an engine company and a truck company. The LAFD has confirmed that fire protection would be considered adequate based on response distance from existing fire stations.[37]

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 Project Site is not considered substandard. Additionally, as previously discussed, per CVC Section 21806, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the increase in traffic

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[36] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

[37] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 8, 2020. Refer to Appendix M of this Draft EIR.*

generated by the Project is not expected to significantly impact emergency vehicle response 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, with regard to response distance and emergency access the Project 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, the construction of which would cause significant environmental impacts.

(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 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 land use category, which has a required minimum fire flow of 6,000 to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum residual pressure of 20 psi at full flow. Additionally, hydrants must be spaced to provide adequate coverage of the building exterior.

As previously stated, there are six existing public fire hydrants in the vicinity of the Project Site. Two hydrants are located along De Longpre Avenue, and the remaining four are located along Homewood Avenue, Leland Way, Fountain Avenue, and Afton Place. The results of the Information of Fire Flow Availability submitted to LADWP confirmed that the six existing hydrants can provide a total fire flow of 8,500 gpm with minimum residual pressures ranging from 82 to 89 psi, which meets the fire flow requirement for the Project and exceeds the 20 psi requirement.[38]

[38] *KPFF, Inc., 1360 Vine St—Mixed Use Residential, Utility Infrastructure Technical Report: Energy, Water, and Wastewater, August 2021.*

Furthermore, as required by the LAMC for new high-rise buildings, the Project's new high-rise building would incorporate a fire sprinkler suppression system. In accordance with Project Design Feature FIR-PDF-1, automatic fire sprinklers would also be incorporated in the rehabilitated bungalows. The installation of such systems 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.

Therefore, with regard to fire flow, the Project 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, the construction of which would cause significant environmental impacts.

(iv) Conclusion

Based on the analysis above, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain fire protection and emergency services. In addition, as concluded in the written correspondence from the LAFD included in Appendix M of this Draft EIR, with the implementation of the recommendations set forth therein along with any additional recommendations that could be made during LAFD's later review of the Project, potential impacts to fire protection services would be addressed. **Therefore, operation of the Project would not result in substantial adverse physical 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 services. Project impacts would be less than significant, and no mitigation measures are required.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to fire protection were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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. 27, 82, 41, 52, and 35. The Project, in conjunction with growth forecasted in the City through 2027 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection service, including staffing, equipment, and facilities. Cumulative growth in the greater Project area through 2027 includes specific known development projects, growth that may be projected as a result of land use designation and policy changes contained in the Hollywood Community Plan Update, as well as general ambient growth projected.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 102 is a conservative assumption, as some of the related projects may not be built out by 2027 (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 102 are fully built out by 2027, unless otherwise noted. In addition, Related Project No. 103, the Hollywood Community Plan Update, 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 2027, well before the Community Plan Update's horizon year. Moreover, 2027 is a similar projected buildout year as many of the 102 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 rights-of-way. In addition, as parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by LADOT, would be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As such, the Project would not have significant impacts on access and safety. Similar to the Project, each related project would implement 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, and 41. The increase in development and residential and employee service populations from the Project, related projects, as well as other future development in the 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. Similar to the Project, the related projects and other future development projects in the Hollywood Community Plan area would be reviewed by the LAFD on a project-by-project basis to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection services. 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. Each related project would also be required to comply with regulatory requirements related to fire protection. In addition, the Project, each related project, and

other future development projects in the Community Plan area would be required to comply with 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.[39] 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. 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 engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time, as appropriate.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 a categorical exemption under CEQA Guidelines Sections 15301 or 15332, Negative Declaration, or Mitigated Negative Declaration.[40] 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 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

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[39] *City of Los Angeles, Proposed Budget for the Fiscal Year 2020-2021.*

[40] *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.*

of this Project or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, as discussed above, such facilities would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection would be less than significant.

Based on the above, the Project's contribution to cumulative impacts related to an increase in fire protection services that would require a new fire station, or the expansion of an existing fire station, the construction of which could cause significant environmental impacts would not be cumulatively considerable. As such, cumulative impacts on fire protection would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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