IV. Environmental Impact Analysis

L.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 dated February 20, 2021, which is included in Appendix L-1 of this Draft EIR;[1] and the Harvard-Westlake River Park Project Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Technical Report) prepared by KPFF Consulting Engineers, dated February 2022, which is provided in Appendix O, of this Draft EIR.[2]

2. Environmental Setting

a) Regulatory Framework

There are several plans, regulations, 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 Agency
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code

[1] Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated February 20, 2021. Provided in Appendix L-1 of this Draft EIR.

[2] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022. Provided in Appendix O of this Draft EIR.

- 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
- City of Los Angeles General Plan Safety Element
- Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass 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 Administrations (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 Agency

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

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 Sections 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 Disaster Mitigation 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 the Disaster Mitigation 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 the Disaster Mitigation 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 general 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.[3] The building standards in the California Building

[3] California Building Code (CCR, Title 24, Part 2).

Code apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. 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.[4] Section 903 of the California Fire Code requires automatic sprinkler systems in recreational uses (Group A-3 occupancy) and schools up to Grade 12 (Group E occupancy). The California Building Code, as adopted by the City, also includes standards established by the National Fire Protection Agency (NFPA). NFPA is a global self-funded nonprofit organization, the purpose of which is to reduce death, injury, property and economic loss due to fire, electrical and related hazards. State and Los Angeles fire codes incorporate NFPA 14, which sets standards for the installation of standpipes and hose systems to ensure that systems will work as intended to deliver adequate and reliable water supplies in a fire emergency.

(b) California Fire Service and Rescue Emergency Mutual Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (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).[5] 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, Cal 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 Cal OES.[6]

4 Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

5 Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.

6 Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014

(c) California Vehicle Code

Section 21806 of the CVC pertains to emergency vehicles responding to Code 3 incident/calls.[7] 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.*

(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 directs 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, the City 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. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services."

(e) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by

[7] 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.

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, above). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

(3) Local

(a) City of Los Angeles Charter

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

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.L.1-1,** *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies*. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure.[8] 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. Under the Framework

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

Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.[9] This is consistent with the specifications for response distances within the LAMC.

TABLE IV.L.1-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT INFRASTRUCTURE AND PUBLIC SERVICES GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
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, General Plan Framework Element, 2001.

(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, as shown in **Table IV.L.1-2**, *Relevant General Plan Safety Element Goals, Objectives, and Policies*. In addition, the City's Safety Element designates disaster

[9] City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire.

routes. As shown in the Safety Element, the closest east/west-trending Selected Disaster Routes include Ventura Boulevard located approximately 650 feet to the south and Moorpark Street located approximately 0.25 mile to the north. The nearest north/south trending Selected Disaster Routes are Laurel Canyon Boulevard approximately 0.55 mile to the east of Whitsett Avenue and Woodman Avenue approximately 1.5 miles to the west of Whitsett Avenue.

TABLE IV.L.1-2
RELEVANT GENERAL PLAN SAFETY ELEMENT GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
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 Emergency Operations Organization (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 gallons per minute (gpm) would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less

TABLE IV.L.1-2
RELEVANT GENERAL PLAN SAFETY ELEMENT GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
	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, General Plan Safety Element, 1996.

(d) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass 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 City's 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 fire 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. With regard to fire protection, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan includes the following policy:

Policy 9-1.1 Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

(e) Los Angeles Municipal Code

The Los Angeles Fire Code (LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code and the International Fire Code. The City's 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. Specific regulations regarding fire prevention and protection are discussed below.

Section 57.107.5.2 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.

Section 57.108.7 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: LAFD 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.

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).

Section 57.4704.5.1 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.

Section 57.503.1.4 requires an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway.

Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required), with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved hydrant. The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development.

Section 57.507.3.3 limits the maximum response distances to an LAFD station based on the type of land use. Applicable distances are based on LAFD's comment letter for each individual project.

Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

(f) Propositions F and Q

Proposition F, the City of Los Angeles 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 two 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. As of January 2017, all of the proposed projects have been completed.[10] Also, as reported in November 2019, BOE completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.[11]

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[12]

[10] Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb-March 2016.

[11] City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019

[12] City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report – February/March 2016.

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

(h) Los Angeles Fire Department Strategic Plan 2018-2020

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development.

b) Existing Conditions

(1) Fire Protection Services and Facilities

Fire prevention, fire suppression, life safety, and emergency medical services within the City are provided by the LAFD. The LAFD is a full-spectrum life safety agency that serves a population of approximately four million people. The LAFD's estimated 3,435 uniformed personnel and 381 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. Currently, there is an estimated total of 1,018 uniformed firefighters on-duty at 106 fire stations across the LAFD's 469-square-mile jurisdiction.[13]

The LAFD emergency services are divided across four geographic bureaus, including Central, South, Valley, and West. The Project Site is located in LAFD's Operations Valley Bureau and is comprised of Battalions 10, 12, 14, 15, and 17. The Operations Valley Bureau encompasses the entire San Fernando Valley portion of Los Angeles.[14]

[13] Los Angeles Fire Department, Department Overview – Our Mission, http://www.lafd.org/about/about-lafd/our-mission, accessed January 20, 2022.

[14] Los Angeles Fire Department, Valley Bureau, https://www.lafd.org/about/valley-bureau, accessed January 20, 2022.

As shown in **Figure IV.L.1-1**, *Fire Stations in the Vicinity of the Project Site*, there are five fire stations that provide primary fire protection services to the Project Site and surrounding area. **Table IV.L.1-3,** *Fire Stations Located in the Project Vicinity*, includes the location, distance/direction from the Project Site, average response times, equipment, and staffing for each of the fire stations.

TABLE IV.L.1-3
FIRE STATIONS LOCATED IN THE PROJECT VICINITY

Fire Station/ Location[a]	Driving Distance/ Direction from Project Site	Average Response Times[a,b,c]		Equipment[d,e]	Staffing
		EMS	Non-EMS		
Fire Station 78 4041 Whitsett Avenue, Studio City, CA 91604	Immediately adjacent to south	4:40	5:18	Assessment Light Force (Ladder Truck and Engine), Paramedic Rescue Ambulance, EMS Battalion Captain, BLS Rescue Ambulance, and Arson Investigation Unit	13
Fire Station 108 12520 Mulholland Drive, Beverly Hills , CA 91210	2.5 miles south	7:07	6:20	Assessment Engine	4
Fire Station 86 4305 Vineland Avenue, Studio City, CA 91602	2.6 miles east	3:53	4:02	Assessment Engine, Paramedic Rescue Ambulance, Swift Water Rescue Team, and Brush Patrol	6
Fire Station 102 13200 Burbank Boulevard, Sherman Oaks, CA 91401	2.9 miles north	4:25	4:32	Assessment Engine and Paramedic Rescue Ambulance	6
Fire Station 97 8021 Mulholland Drive, Los Angeles, CA 90046	2.9 miles southeast	6:19	6:34	Assessment Engine and Paramedic Rescue Ambulance	7

[a] Los Angeles Fire Department, FireStatLA, http://www.lafd.org/fsla/stations-map, accessed March 1, 2021.

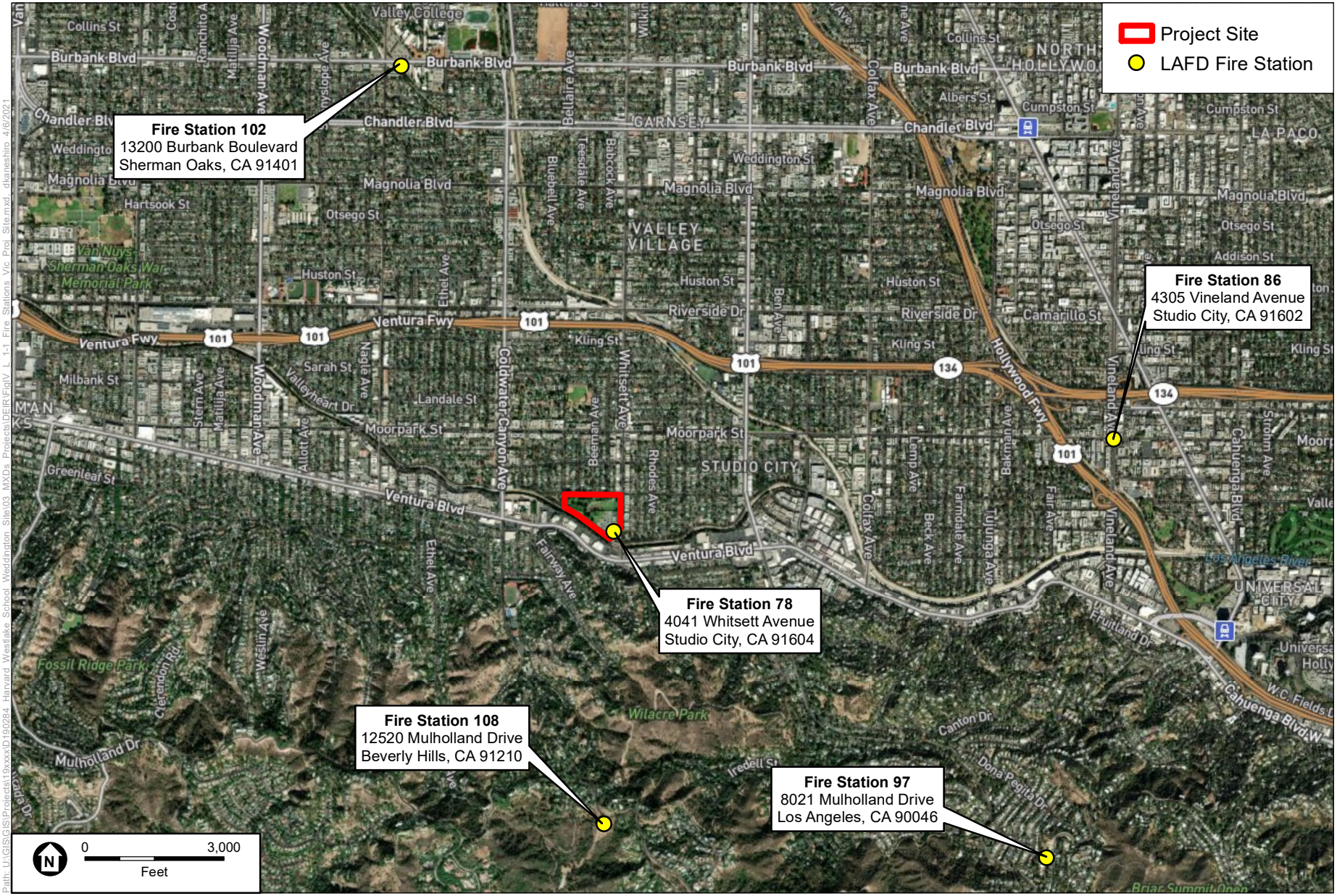
[b] Average Response times from January through December of 2020 provide the most accurate annual average. Average Response Times include call processing, turn out, and travel time. The Citywide average response time from January through December 2020 is 4:39 for EMS and 4:31 for non-EMS.

[c] Non-EMS = Fire and other services. EMS = Emergency Medical Services.

[d] BLS = Basic Life Support

[e] Assessment Engines are indicative of an Engine Company. Fire engines are equipped with hoses and water so that fire personnel can aggressively fight fires.

SOURCE: Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, correspondence dated February 20, 2021. Provided in Appendix L-1 of this Draft EIR. Los Angeles Fire Department, FireStatLA, https://www.lafd.org/fsla/stations-map?year=2020, accessed March 1, 2021.



SOURCE: Open Street Map 2021; City of Los Angeles Open Data: https://data.lacity.org/, Accessed November 2020; ESA 2021.

Harvard-Westlake River Park Project

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

As shown in Table IV.L.1-3, LAFD Fire Station 78 at 4041 Whitsett Avenue is located nearest and adjacent to the Project Site. Per the City's ZIMAS website, LAFD Fire Station 78 is the first due fire station for the Project Site. The other four stations named by LAFD that would provide support for fire protection services to the Project Site are LAFD Fire Stations 108, 86, 102, and 97, located (by driving distance) approximately 2.5 miles south, 2.6 miles east, 2.9 miles north, and 2.9 miles southeast, respectively, of the Project Site. The closest fire station with an Engine Company is LAFD Fire Station 108, and the closest station with a Truck Company is LAFD Fire Station 78.

Specific response times for the stations for January through December 2020 are included in Table IV.L.1-3. LAFD Fire Station 78, the closest station to the Project Site, had an average response time of 4:40 and 5:18 minutes for EMS and non-EMS incidents, respectively. LAFD Fire Station 108 had an average response time of 7:07 and 6:20 minutes for EMS and non-EMS incidents, respectively. LAFD Fire Station 86 had an average response time of 3:53 and 4:02 minutes for EMS and non-EMS incidents, respectively. LAFD Fire Station 102 had an average response time of 4:25 and 4:32 minutes for EMS and non-EMS incidents, respectively. LAFD Fire Station 97 had an average response time of 6:19 and 6:34 minutes for EMS and non-EMS incidents, respectively. The Citywide average response times between January and December 2020 were 4:39 and 4:31 minutes for EMS and non-EMS incidents, respectively.

These response times are provided for information purposes since the LAFD has not established response time standards for emergency response. 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 Los Angeles Department of Transportation (LADOT), has 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.[15] The City has over 205 miles of major arterial routes that are equipped with FPS.[16]

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5

[15] Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

[16] Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

minutes for EMS response and 5 minutes, 20 seconds for fire suppression."[17] If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of 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* (2015) 242 Cal.App.4th 833 ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection.

The LAFD has recently taken a number of steps to improve their related systems, processes and practices, which in turn serve to reduce response times. Upgrades recently completed or pending include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; and development of a new computer-aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident.[18]

(2) Emergency Access

Emergency access to the Project Site is provided via adjacent roadways, including Whitsett Avenue, Valley Spring Lane, and Bellaire Avenue. Emergency vehicles could directly access the Project Site from the two driveways located along Whitsett Avenue, both of which are north of LAFD Fire Station 78. A service driveway located along Valley Spring Lane could be used by smaller emergency vehicles, such as light duty-trucks and ambulances to access the Project Site.

With regard to LAFD Fire Station 78 emergency access, the station's main driveway used for the departure of the larger fire trucks from the station bays is located on Whitsett Avenue, north of Valleyheart Drive. The station also has two driveways on the north side of Valleyheart Drive. Of these two driveways, the westerly driveway is used for the return of the larger fire vehicles, which swing wide and use most of the Valleyheart Drive roadway to enter the fire station before proceeding to the bays. The easterly driveway to the fire station is used for the entry and departure of smaller vehicles, such as ambulances.

(3) Fire Water Infrastructure/Fire Flow for Firefighting Services

There are several existing public fire hydrants in the immediate vicinity of the Project Site.[19] Four hydrants are located along Whitsett Avenue: one at the northwestern corner

[17] 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.

[18] Los Angeles Fire Department, A Safer City 2.0 Strategic Plan.

[19] KPFF Consulting Engineers, Harvard-Westlake River Park Project (4141 Whitsett Avenue, Studio City, CA 91604) Utility Infrastructure Technical Report: Water, Wastewater, and Energy, February 2022. Pag 3. Provided in Appendix O of this Draft EIR.

at the intersection of Valley Spring Lane; one at the northeastern corner at the intersection of Valley Spring Lane; one 300 feet south of Valley Spring Lane; and one 345 feet north of Valleyheart Drive. Two additional hydrants are located along Valley Spring Lane: one at the northwestern corner at the intersection of Teesdale Avenue and one at the northwestern corner at the intersection of Babcock Avenue.

(4) Fire Hazard Areas

The Project Site is in a highly urbanized area and is not located within an area designated by CAL FIRE or LAFD as a Very High Fire Hazard Severity Zone (VHFHSZ).[20] The Project Site is also not located within an area designated by the City as a wildland fire hazard area.[21,22] However, the foothills of the Santa Monica Mountains, located south of the Project Site to the south of Ventura Boulevard, 0.13 mile to the south of the Project Site, are designated as a local responsibility area by CAL FIRE and Mountain Fire District by the City.[23,24] In addition, the Ventura Boulevard corridor and a narrow edge along the north side of the Los Angeles River between approximately Fulton Avenue and Laurel Canyon Drive are designated as Fire Buffer Zones.[25] The area south of the Los Angeles River, directly across from the Project Site and continuing into the Santa Monica Mountains is located in a VHFHSZ.[26] VHFHSZs are primarily located in the hilly and mountainous regions of the City of Los Angeles where wildland fires originating on brush-covered undeveloped hillsides can be affected by urban development and vice versa.

3. Project Impacts

a) Thresholds of Significance

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

[20] CAL FIRE, California Fire Hazard Severity Zone Viewer, https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, accessed December 14, 2020.

[21] City of Los Angeles Department of City Planning, General Plan Safety Element, Exhibit D: Selected Wildlife Hazard Areas, adopted November 26, 1996.

[22] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report [APN Search]: 2375-018-020 and -903. Generated October 27, 2020.

[23] CAL FIRE, California Fire Hazard Severity Zone Viewer, https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414, accessed December 14, 2020.

[24] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles.

[25] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles.

[26] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report [APN Search]: 2375-018-020 and -903. Generated October 27, 2020.

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.

For this analysis, the Appendix G Thresholds are 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 questions. The following factor is identified in the City's Threshold Guide to evaluate fire protection services impacts:

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

b) Methodology

Project impacts regarding fire protection services are evaluated by the LAFD on a project-by-project basis. A project's land use designation, 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 effects 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 is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the local vicinity of the Project Site. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of

fire and emergency facilities, that 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 under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration.

In regard to fire hydrant flow, the Los Angeles Department of Water and Power (LADWP) performed a hydraulic analysis of their water system to determine if adequate fire flow is available to the fire hydrants surrounding the Project Site. LADWP's approach consists of analyzing their water system model in the vicinity of the Project Site. Based on the results in the Information of Fire Flow Availability Request (IFFAR), dated December 7, 2020, in Exhibit 2 of the Utility Technical Report, provided in Appendix O of this Draft EIR, LADWP determines whether it can meet the projected fire hydrant flow needs based on existing infrastructure through an IFFAR.

c) Project Design Features

The Project would incorporate Fire Code requirements, including those summarized in the letter from LAFD included in Appendix L of this Draft EIR. No specific project design features are proposed with regard to fire protection. However, as discussed in Section IV.M, *Transportation,* of this Draft EIR, pursuant to Project Design Feature TRAF-PDF-1, the Project would implement a Construction Management Plan that would include measures to ensure emergency access to the Project Site and adjacent properties. Project Design Feature TRAF-PDF-1 would minimize impacts to vehicular and other forms of circulation 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, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires 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. The Project Site is adjacent to LAFD Fire Station 78, located at 4041 Whitsett Avenue, and less than three

miles from four other stations. Of the other stations, LAFD Station 86 in Studio City and LAFD Station 102 in Sherman Oaks, would have easy, flatland access to the Project Site. LAFD Fire Station 78 includes an Assessment Light Force Engine, Paramedic Rescue Ambulance, EMS, and Rescue services. Average response times for these stations for all EMS services are 4:40 minutes for LAFD Station 78, 3:53 minutes for LAFD Station 86, and 4:25 minutes for LAFD Station 102. However, in the event of a fire or medical emergency during construction, LAFD Fire Station 78 would have almost immediate access to the on-site emergency. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic pursuant to California Vehicle Code Section 21806. Furthermore, Project construction activities would be short-term and temporary. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 CFR Part 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[27] 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 existing LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on Valley Spring Lane and Whitsett Avenue. 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, a Construction Management Plan will be implemented during Project construction pursuant to Project Design Feature TRAF-PDF-1 set forth in Section IV.M, *Transportation*, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

[27] United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.150, accessed April 6, 2021.

The Project Site is largely available to access from the adjacent roadways. The Safety Element identifies Selected Disaster Routes throughout the City, which function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance for short-term emergency operations are emphasized along these routes. As shown in the Safety Element, the closest east/west-trending Selected Disaster Routes include Ventura Boulevard located approximately 650 feet to the south and Moorpark Street located approximately 0.25 mile to the north.[28] The nearest north/south trending Selected Disaster Routes are Laurel Canyon Boulevard approximately 0.55 mile to the east of Whitsett Avenue and Woodman Avenue approximately 1.5 miles to the west of Whitsett Avenue. 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 impact emergency access. However, with implementation of Project Design Feature TRAF-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter a.m. and a.m. peak periods, thereby reducing the potential for traffic-related conflicts. 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 are maintained on adjacent rights-of-way, as well as minimizing response times. Furthermore, pursuant to CVC 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 to respond to emergencies in a timely manner.

Based on the above, construction of the Project would not result in the need for a new fire station or the expansion of an existing facility, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, impacts to fire protection during Project construction would be less than significant.

[28] City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H, Critical Facilities & Lifeline Systems.

(b) Operation

(i) Facilities, Equipment, and Fire Flow

Greater occupation and activity at the Project Site have the potential to increase fire hazard. The section analyzes the Project's potential operational impacts on LAFD services, facilities and equipment, fire flow, and response distances.

With regard to fire flow, in general, the required fire flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. As described in Section IV.O.1, *Utilities and Service Systems – Water Supply*, of this Draft EIR, domestic and fire water service to the Project Site would be supplied by the LADWP. The LAFD has determined that the required fire flow for the Project, which falls within the low-density residential category, would be 2,000 gpm (total) from three adjacent fire hydrants flowing simultaneously with a residual water pressure of 20 psi.[29] An IFFAR was submitted to LADWP to confirm adequate fire flow pressure for the Project from the existing infrastructure. LADWP indicated in the IFFAR results that three nearby fire hydrants flowing simultaneously would result in a combined flow that would meet or exceed the LAFD fire flow requirement of 2,000 gpm. Refer to the IFFAR results in Exhibit 2 in the Utility Technical Report as provided by LADWP, which confirm that the Project has adequate fire flow available to comply with LAMC Section 57.507.3.

LAFD Fire Station 78, located directly adjacent to the Project Site along Whitsett Avenue, is the first due-in station to the Project Site. Additional back-up response to the Project Site would be provided by LAFD Fire Stations 108, 86, 102, and 97. The City's Fire Code (LAMC Section 57.507.3.3) includes response distances that if exceeded will require the installation of an automatic fire sprinkler system. LAMC Section 57.507.3.3 requires the first-due Engine Company for residential and neighborhood commercial uses to be within 1.5 miles of a Project Site. Non-neighborhood commercial uses are required to have an Engine Company within 1 mile of a Project Site. Also, the first-due Truck Company for residential and neighborhood commercial uses should be within 2 miles of a Project Site. Non-neighborhood commercial uses are required to have a Truck Company within 1.5 miles of a Project Site. While open space and recreational facilities, such as the Project, are not specifically listed in LAMC Section 57.507.3.3, for purposes of this analysis, conservatively utilizing a distance of 1 mile for a fire station with an Engine Company and 1.5 miles for a Truck Company, since the adjacent LAFD Fire Station 78 (less than 1 mile from Project Site) is an Assessment Light Force with both a truck and an engine, the Project would be within the response distances for both an Engine Company and a Truck Company.[30] As such, the Project would not require an automatic fire sprinkler system based solely on response distances requirements of LAMC Section 57.507.3.3. However, the Los Angeles Fire Code incorporates Section 903 of the California Fire Code that

[29] Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, correspondence dated February 20, 2021. Provided in Appendix L-1 of this Draft EIR.

[30] Assessment Engines are indicative of an Engine Company.

requires automatic sprinkler systems in recreational uses, such as gymnasiums (Group A-3 occupancy) or, if the Project's gymnasium is considered a school use for up to Grade 12 (Group E occupancy).

Therefore, in compliance with applicable codes, 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 which will reduce or eliminate the public hydrant demands. Based on LAMC Section 94.2020.0 that adopts by reference NFPA 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm for all buildings on the Project Site, which can be supplied to the Project Site by LADWP as shown by the approved Service Advisory Request (SAR) (see Exhibit 3 of the Utility Technical Report).

The Project would demolish the existing private nine-hole golf course and tennis facility to accommodate an athletic and recreation facility for the Harvard-Westlake School's students, employees, and general public.[31] As detailed further in Chapter II, *Project Description*, of this Draft EIR, attendance levels on the Project Site would vary throughout the week based on the activities and events taking place. When accounting for the total number of persons to access/use the Project Site on a yearly basis and averaging them across 365 calendar days, there would be an average of 1,955 persons per day on the Project Site.[32] Currently, there are approximately 1,022 weekday visitors and 2,044 weekend visitors to the Project Site.[33] Thus, over the course of the year, the Harvard-Westlake-related uses and community/public use of the Project Site would increase the Project's Site's demand for fire protection services, such as emergency medical

[31] Note that the Weddington Golf & Tennis clubhouse, including its cafe, adjacent putting green, and low brick retaining wall which are located on the northeastern portion of the Project Site, would remain as part of the Project.

[32] The number of persons is derived from the average daily number of employees, students, spectators, and visitors anticipated to access/use the Project Site. To determine the average number of persons per day, the total number of persons visiting the Project Site during the calendar was determined, which consist of: 1) 106,044 persons associated with Harvard-Westlake activities (based on 2018-2019 data); 2) 585,468 community users (based on standard trip generation rates for a recreational community center and tennis courts from the Institute of Transportation Engineers); 3) 19,500 persons associated with Harvard-Westlake special events (30/year); and 4) 2,500 persons associated with public events (5/year). The total of these four categories = 713,512 persons per year. Thus, 713,512 persons per year divided by 365 days equals 1,955 persons per day. Of these 1,955 persons per day, approximately 82% are associated with community/public use and 18% associated with Harvard-Westlake activities/events. See Appendix O-2 of this Draft EIR for detailed visitor calculations, which were used for solid waste generation purposes.

[33] Weekday and weekend visitors account for the average number of visitors, as well as employees, for the entire Project Site, including the existing golf course, tennis courts, and café uses. Weekday visitors calculated based on traffic counts across a 24-hour weekday period. As part of the Transportation Assessment (see Appendix M of this Draft EIR), 511 vehicles visited the Project Site during a 24-hour weekday traffic count. Assuming an average vehicle occupancy of 2 people per vehicle, 1,022 visitors are assumed under weekday daily conditions. The average vehicle occupancy (AVO) of 2 is consistent with data from the *National Household Travel Survey* (Federal Highway Administration, 2017) for social/recreational trips. According to the current site operator, there are roughly twice as many visitors on weekends than during weekdays. Thus, 2,044 visitors are assumed for weekend daily conditions.

responses, compared to existing conditions. On the maximum (worst case) day, based on a review of the School's 2018-19 calendar, there would be a total of 2,966 people on-site over the course of the entire day.[34]

For the proposed structures on the Project Site, including the multi-purpose gymnasium and ancillary structures for Fields A, B, and the pool, the Project would comply with the applicable OSHA, Building Code, Fire Code, other LAMC sections, and LAFD requirements, including: the provision of fire resistant doors, materials, walkways, and stairwells; installation of a fire sprinkler suppression system, smoke detectors, signage, fire alarms, building emergency communication systems, smoke control systems; implementation of an Emergency Safety Plan; compliance with LAFD fire apparatus and personnel access requirements; and water systems and roadway improvements improved to the satisfaction of the LAFD. In addition, the LAFD requires a variety of fire prevention and protection features, including installation of Knox Boxes, building identification, emergency access lanes, building setbacks, and a required Fire Annunciator panel or Fire Control Room, among other features.[35] Compliance with applicable Los Angeles 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 the applicable regulatory requirements would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities.

In summary, as stated in the correspondence with the LAFD, the adequacy of fire protection for a given area is based on required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in the area. Per the LAFD, according to these criteria, fire protection to the Project Site would be adequate.[36]

(ii) Emergency Access

It is acknowledged that at certain times, such as at the end of a large interscholastic competition or following a community Special Event, the Project would temporarily increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the local Project vicinity. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter,

[34] Of the 2,966 person total, 1,248 would be members of the public and 1,718 from Harvard Westlake (both using data and calculations in Appendix O-2 of this Draft EIR).

[35] Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, correspondence dated February 20, 2021. Provided in Appendix L-1 of this Draft EIR.

[36] Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, correspondence dated February 20, 2021. Provided in Appendix L-1 of this Draft EIR.

and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. As mentioned above, none of the streets adjacent to the Project Site are a City-designated disaster route.

Emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to CVC Section 21806 and multiple station response. In addition, because of the grid pattern of the local street system and the proximity to multiple freeways, each of the fire stations that serves the Project Site have multiple routes available to respond to emergency calls at the Project Site.

All emergency vehicles, including fire trucks/engines, could enter the Project Site via a driveway at the paved portion of Valleyheart Drive located just south of LAFD Fire Station 78. Smaller emergency vehicles, such as ambulances and patrol cars, could also access the Project Site via the north driveway along Whitsett Avenue leading to the parking garage.

Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to the Project Site and the Project vicinity. Furthermore, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate emergency vehicle access. Such features would help to ensure fire response times are not substantively increased.

As indicated above, LAFD Fire Station 78 is located on the north side of Valleyheart Drive, which serves as access for the Project's southern driveway.

As part of the Project design and per Project Design Feature TRAF-PDF-2, a flashing red warning light(s) will be installed on the southern exit driveway within the Project Site at a point located before vehicles reach Valleyheart Drive that will hold back vehicles exiting the Project Site roundabout onto Valleyheart Drive. This warning light will be activated by a remote control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting one of the LAFD driveways on Valleyheart Drive. The warning light would allow for adequate emergency access by LAFD vehicles between Valleyheart Drive and Whitsett Avenue by reducing conflicts between vehicles leaving the Project Site and emergency vehicles leaving/coming back to the station. Further, the warning light would minimize the eastbound queues by vehicles leaving the Project Site along Valleyheart Drive at Whitsett Avenue when emergency vehicles need to access Valleyheart Drive. With the warning light in operation, LAFD would be able to effectively maintain adequate emergency vehicle access to LAFD Fire Station 78. Further, the warning light would ensure emergency response times are not substantively increased. Also, the Project would include an at-grade security kiosk located near the roundabout, thereby placing a security guard nearby to assist with traffic management when the warning light is activated.

Finally, the site plan for the Project would be reviewed prior to issuance of a building permit to ensure that all emergency vehicle safety requirements (including those related to emergency access) are met.

Compliance with applicable Los Angeles 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. Therefore, based on the considerations above, despite the Project's periodic and temporary increase in localized traffic, the Project would not significantly impair the LAFD from responding in a timely manner to emergencies at the Project Site or the surrounding area.

In summary, the Project would provide for emergency access into the Project Site and would not substantially interfere with emergency access in the surrounding neighborhood such that response times are substantively increased. It would also provide a system to maintain adequate access for emergency vehicles to enter and return to the adjacent LAFD Fire Station 78 and, thus, would not interfere with the operation of that fire station or substantively increase response times.

(c) Conclusion

Based on the above, Project operation would not result in the need for a new fire station or the expansion of an existing facility, 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. Therefore, impacts to fire protection and emergency medical services during Project operation would be less than significant.

(2) Mitigation Measures

Impacts regarding fire protection services were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding 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

Impacts to LAFD services and facilities for each of the related projects would be addressed as part of each related project's development review process conducted by the City. Each related project would be subject to the City's routine permitting process,

which would include a review by the LAFD to ensure that sufficient measures are implemented to reduce potential impacts to fire protection services.

Chapter III, *Environmental Setting*, of this Draft EIR, identifies five related projects. The related projects are located within the fire station service areas of the same LAFD fire stations that would serve the Project (i.e., LAFD Fire Stations 78, 108, 86, 102, and 97).

(a) Construction

As with 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 applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

In the event that Project construction occurs 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 Management Plan (Project Design Feature TRAF-PDF-1), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-ways. Since the Project would not require narrowing of adjacent public rights-of-ways that may be hazardous to roadway travelers, the Project would not have significant impacts on access and safety. Similar to the Project, each related project would implement similar design features during construction and would be subject to the City's routine construction permitting process, or equivalent permitting process for the related project in the County of Los Angeles, which includes a review by LAFD to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and related projects would not significantly impact LAFD response times within the Project vicinity as drivers of fire and emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes opposing traffic, pursuant to Section 21806 of the California Vehicle Code. Finally, the Project itself would not cause a significant impact to fire protection services during construction.

(b) Operation

The increase in development from the Project combined with the related projects would generate the need for additional fire protection and EMS from the fire stations discussed above.

As stated by LAFD, the development of the Project and related projects in the immediate area may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities.[37] However, as previously discussed, the LAFD continuously evaluates fire station placement and overall service capabilities as part of its obligation to provide fire services throughout the City. Currently, the LAFD has no plans to expand or construct new facilities to service the Project Site vicinity.

As for the related projects, with regard to facilities and equipment, similar to the Project, the related projects would be required to 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, and alarm and communications systems. 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, prior to the issuance of a building permit. Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided and reduce demand on LAFD facilities and equipment. As with the Project, related projects would also include the installation of automatic fire sprinklers, as required per City Building Code and Fire Code requirements, to enhance fire safety that would further reduce the demand placed on the LAFD facilities and equipment.

The Project, as well as the 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 by the City. 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.

With regard to response distance, given that the related projects are generally located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. Additionally, in accordance with Fire Code requirements, if a related project would not be

[37] Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, correspondence dated February 20, 2021. Provided in Appendix L-1 of this Draft EIR.

within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the local Project vicinity. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and mitigation measures that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

Additionally, with regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board of 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), the obligation to provide adequate fire protection service 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, as appropriate.[38] At this time, LAFD has not identified that it will be constructing a new station in the area impacted by the Project due to the Project or the Project and related projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 1 acre in size (similar to nearby Stations 78, 108, 86, 102 and 97), and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Therefore, development of a station at this scale is unlikely to result in significant impacts, analysis at this time would be speculative, and projects involving the construction or expansion of a fire station, if needed in the future, would be addressed independently pursuant to CEQA.

(c) Conclusion

Based on the above, the Project's contribution to cumulative impacts associated with the provision of new or physically altered fire facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

[38] City of Los Angeles, Budget for the Fiscal Year 2021-22, modified and adopted by City Council on May 20, 2021.

(2) Mitigation Measures

Cumulative impacts regarding fire protection services were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard 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.