IV. Environmental Impact Analysis
I. Public Services—Fire Protection

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on fire protection and emergency medical services. The analysis includes a description of the existing fire protection and emergency medical services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection and emergency medical services: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information provided by the LAFD, and on the *1718 Vine Street Project, Utility Infrastructure Technical Report: Water* (Utility Report), prepared for the Project by KPFF Consulting Engineers, dated May 2018, which is included in Appendix J of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Occupational Safety and Health Administration

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

(2) State

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including fire safety standards for new buildings, which are provided in the California Fire Code (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 2016 edition of the California Building Code became effective on January 1, 2017.[1] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2016 California Fire Code also went into effect on January 1, 2017.[2] Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.

(b) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of

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

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

Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[3]

(3) City of Los Angeles

(a) City of Los Angeles Charter

Section 520 of the City's 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's General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City 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.[4] Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. The City's General Plan Safety Element, discussed below, recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies. Under the Framework Element, the City standard for response distance from a fire station is 1.5 miles.[5] This is consistent with the specifications for response distances contained within the LAMC, discussed below.

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

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

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

(c) City of Los Angeles General Plan Safety Element

The City's General Plan Safety Element (Safety Element), adopted on November 26, 1996, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities. For example, Policy 2.1.6 requires the LAFD to revise regulations and procedures to include the establishment of minimum standards for the location and expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and emergency medical service response. In addition, the City's Safety Element designates disaster routes. The nearest designated disaster routes to the Project Site are Santa Monica Boulevard, located approximately 0.8 mile south of the Project Site, and Highland Avenue, located approximately 0.7 mile west of the Project Site.[6]

(d) Hollywood Community Plan

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following objectives and policies that are relevant to fire protection:

- Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.

- Fire Protection Policy 1: It is the City's policy that the various components of the fire protection/emergency medical services system be continually evaluated and updated by the Fire Department in coordination with other City departments, as fire protection techniques, apparatus, needs and land use patterns change.

- Fire Protection Policy 2: It is the City's policy that the expansion of existing fire stations and the acquisition of new sites be planned and designed to minimize the displacement of housing and relocation of residents.

- Fire Protection Policy 3: It is the City's policy that public education activities concerning the elimination of fire hazards, methods of fire protection and emergency medical service be encouraged.

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[6] *Los Angeles General Plan Safety Element, Exhibit H, Critical Facilities and Lifeline Systems, adopted by the City Council, November 26, 1996.*

- 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.[7] Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, LAMC Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by LADBS: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable.

The LAMC also addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while Section LAMC 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

[7] *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.*

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 hotel. As set forth in LAMC Section 57.507.3.1, and as determined by the LAFD, the Project falls under the Industrial and Commercial category which has a minimum required fire flow of 6,000 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, such as the Project, require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in Section 57.507.3.2 of the LAMC. 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 provided in LAMC Section 57.507.3.3. Based on Table 57.507.3.3, the maximum response distance for land uses in the Industrial and Commercial category from fire stations with an engine company is 1.0 mile and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. As discussed in further detail below, Fire Station No. 82, located at 5769 West Hollywood Boulevard, is approximately 0.7 mile east of the Project Site and would serve as the "first-in" fire station to the Project Site. Fire Station No. 82 is equipped with a single engine company, paramedic rescue ambulance, and a staff of six. In addition, Fire Station No. 27, located at 1327 North Cole Avenue, is approximately 0.8 mile southwest of the Project Site and also available to provide fire and emergency services to the Project Site. Fire Station No. 27 is equipped with a task force truck and engine company, paramedic rescue ambulance, Emergency Medical Technician (EMT) rescue ambulance, and a staff of 15. Fire Station No. 27 also serves as the Battalion 5 headquarters.[8] Therefore, the Project Site is located within the require response distance from a fire station with an engine and/or truck company.

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. Section 57.409 of the LAMC addresses emergency planning and evacuation requirements for high-rise buildings,

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

including the creation and filing of an emergency plan; LAFD approval of emergency plans, procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations. All emergency plans, procedures, and evacuation signs must be completed and submitted to the LAFD for inspection and approval prior to their implementation in accordance with LAMC Section 57.409.3. LAMC Section 57.409.8.3 requires emergency evacuation signs to be posted in elevator lobbies and adjacent to the doorway leading to the exit stairs. LAMC Section 57.409.9.3 requires residential high-rise buildings to conduct mandatory fire drills at least annually under the direction of a designated Fire Safety Director. In addition, LAMC Section 57.4705 addresses specific fire safety requirements for new high-rises, including specific requirements related to an elevator system, vertical exit enclosures, portable fire extinguishers in each residential occupancy unit, and standby power for window washing equipment. In accordance with LAMC Section 57.4705.1.5, at least one elevator in each bank of elevators must be available for fire emergency service. LAMC Section 57.4705.1.7 requires that at least one elevator car serving all building levels must be available for emergency use. A new high-rise building must also include an automatic sprinkler system. Furthermore, 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 the LAFD and LAFD Requirement No. 10, are provided.

(f) City of Los Angeles Propositions

The City Fire Facilities Bond (Proposition F), approved by voters in November 2000, allocated $378.6 million to build 19 new or replacement neighborhood fire/paramedic stations and new facilities.[9] The Proposition F—Fire Facilities Bond Team oversees allocation of funds and consists of the LAFD, the Bureau of Engineering, and Bovis Lend Lease. The team identified numerous projects to upgrade fire facilities including construction of new training centers, replacing and constructing new fire stations, and building a new Air Operations Helicopter Facility and General Services Helicopter Fleet Maintenance Building. Of the stations nearest the Project Site (further discussed below), Fire Station No. 82, previously located at 1800 North Bronson, was replaced by a new station located at 5769 Hollywood Boulevard.[10]

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involves the spending of $600 million to renovate, improve,

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[9] *City of Los Angeles Department of Public Works, Bureau of Engineering, Facilities Bond Project, www.eng.lacity.org/fire_bond, accessed June 5, 2019.*

[10] *City of Los Angeles Department of Public Works, Bureau of Engineering, Fire Stations, http://eng.lacity.org/project_list, accessed June 5, 2019.*

expand and construct police, fire, 911, and paramedic facilities.[11] Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, replacement of one new police station and jail, construction of two bomb squad facilities, construction of one new Metro detention center, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of one new Valley Traffic Division and Bureau Headquarters, renovation of fire facilities, and renovation of police facilities.[12]

Measure J, which was approved by voters on November 7, 2006, is a Charter amendment and ordinance that involves technical changes to Proposition F. Under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations was required to take place on single sites of at least 2 acres. Measure J allows new regional fire stations funded by Proposition F and located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres.

(g) Los Angeles Fire Department Strategic Plan 2018–2020[13]

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. With implementation of specific strategies, the Strategic Plan 2018–2020 will also align its progress with City of Los Angeles Mayor Eric Garcetti's four priority outcomes to provide a safe city, a well-run city government, a livable and sustainable city, and a prosperous city.

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[11] *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 2013–3014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.*

[12] *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 2013–3014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.*

[13] *LAFD, Strategic Plan 2019–2020, A Safer City 2.0, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed June 5, 2019.*

b. Existing Conditions

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

The LAFD serves as the City's life safety agency with approximately 3,246 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.[14] There are 106 neighborhood fire stations strategically located across the LAFD's 471-square-mile jurisdiction.[15] At any given time, a total of 1,018 firefighters, including 270 paramedics, are on 24-hour duty.[16] In addition, the LAFD is supported by 353 technical and administrative personnel.[17]

As shown in Figure IV.I-1 on page IV.I-10, there are two LAFD fire stations located within a 2-mile radius of the Project Site. As noted above, Fire Station No. 82 is the designated "first in" station and is located approximately 0.7 mile east of the Project Site at 5769 West Hollywood Boulevard.[18] As shown in Table IV.I-1 on page IV.I-11, Fire Station No. 82 is equipped with a single engine company, paramedic rescue ambulance, and a staff of six.[19] The secondary fire station serving the Project Site is Fire Station No. 27, which is located approximately 0.8 mile southwest of the Project Site at 1327 North Cole Avenue.[20] Fire Station No. 27 is equipped with a task force truck and engine company, paramedic rescue ambulance, EMT rescue ambulance, and a staff of 14. As described above, Fire Station No. 27 also serves as the Battalion 5 headquarters.[21]

As identified by the LAFD, Fire Station Nos. 76, 52, and 35 are also capable of responding to fire protection and emergency medical services needed at the Project Site. These stations are located beyond a 2-mile radius of the Project Site. Specifically, Fire Station No. 76 is located approximately 2.3 miles northwest of the Project Site at 3111 North Cahuenga Boulevard. It is equipped with a single engine company, paramedic

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14 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed June 5, 2019.*

15 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed June 5, 2019.*

16 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed June 5, 2019.*

17 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed June 5, 2019.*

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

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

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, April 30, 2018.*

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, April 30, 2018.*

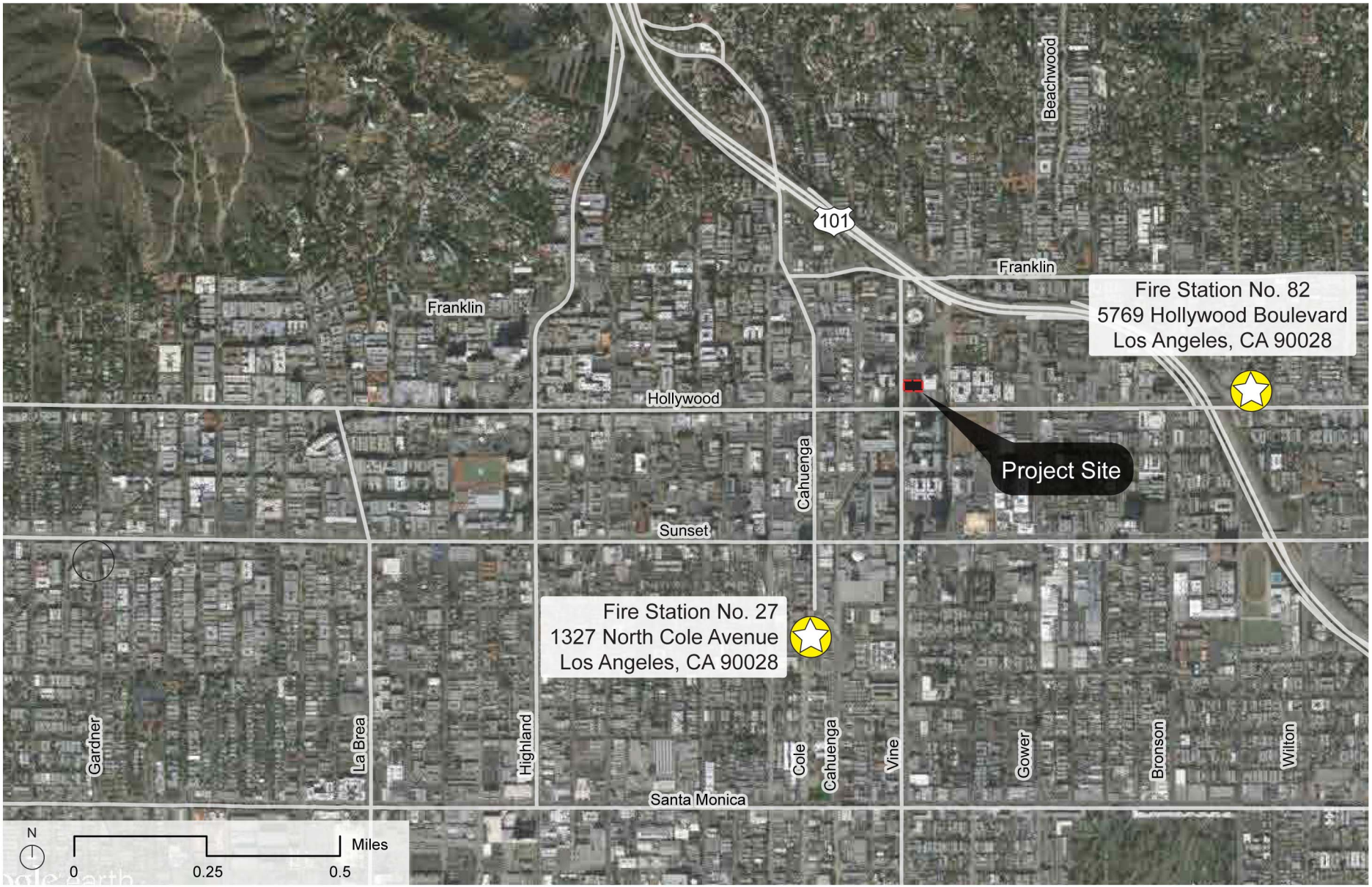

Figure IV.I-1
Fire Stations in the Vicinity of the Project Site

Source: Google Earth, 2018; Eyestone Environmental, 2018.

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

Fire Station	Distance from Project Site	Equipment	Staff
Fire Station No. 82 5769 W. Hollywood Blvd. Los Angeles, CA 90028	0.7 mile	• Single Engine Company • Paramedic Rescue Ambulance	6
Fire Station No. 27 1327 N. Cole Ave. Los Angeles, CA 90028 (Battalion 5 Headquarters)	0.8 mile	• Headquarters Battalion 5 • Task Force Truck and Engine Company • Paramedic Rescue Ambulances • EMT Rescue Ambulance	14
Fire Station No. 76 3111 N. Cahuenga Blvd. Los Angeles, CA 90068	2.3 miles	• Single Engine Company • Paramedic Rescue Ambulance	6
Fire Station No. 52 4957 Melrose Ave. Los Angeles, CA 90029	2.3 miles	• Single Engine Company • Paramedic Rescue Ambulance • Paramedic Supervisor	6
Fire Station No. 35 1601 N. Hillhurst Ave. Los Angeles, CA 90027	2.4 miles	• Task Force Truck and Engine Company • Paramedic Rescue Ambulance	10

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, April 30, 2018.

rescue ambulance, and a staff of six.[22] Fire Station No. 52 is located approximately 2.3 miles southeast of the Project Site at 4957 Melrose Avenue. It is equipped with a single engine company, paramedic rescue ambulance, paramedic supervisor, and a staff of six.[23] Fire Station No. 35 is located approximately 2.4 miles west of the Project Site at 1601 North Hillhurst Avenue. It is equipped with a task force truck and engine company, paramedic rescue ambulance, and a staff of 10.[24] Although these fire stations have been identified by the LAFD for fire protection and emergency medical services at the Project Site, its locations are beyond the 1.0-mile response distance requirement of a fire station with an engine company and the 1.5-mile response distance requirement for a fire station with a truck company as required by the LAMC.

[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, April 30, 2018.*

[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, April 30, 2018.*

[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, April 30, 2018.*

Specific response times for these stations in 2018 are shown in Table IV.I-2 on page IV.I-13. The average response time for emergency medical service incidents for Fire Station No. 82 was 6 minutes 32 seconds, and the average response time for non- emergency medical service incidents was 6 minutes and 21 seconds.[25] For Fire Station No. 27, the average response time for emergency medical service incidents was 6 minutes 22 seconds, and the average response time for non-emergency medical service incidents was 5 minutes 58 seconds.[26] For Fire Station No. 76, the average response time for emergency medical service incidents was 7 minutes 50 seconds, and the average response time for non-emergency medical service incidents was 7 minutes 38 seconds.[27] For Fire Station No. 52, the average response time for emergency medical service incidents was 6 minutes 23 seconds, and the average response time for non-emergency medical service incidents was 6 minutes 08 seconds.[28] For Fire Station No. 35, the average response time for emergency medical service incidents was 6 minutes 9 seconds, and the average response time for non-emergency medical service incidents was 5 minutes 54 seconds.[29] Citywide, the average response time in 2018 were 6 minutes and 36 seconds for emergency medical service incidents, and 6 minutes 24 seconds for non-emergency medical service incidents.[30]

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.[31] 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

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[25] *LAFD, FireStatLA, Station 82 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=681&year=2018, accessed June 5, 2019.*

[26] *LAFD, FireStatLA, Station 27 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=441&year=2018, accessed June 5, 2019.*

[27] *LAFD, FireStatLA, Station 76 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=656&year=2018, accessed June 5, 2019.*

[28] *LAFD, FireStatLA, Station 52 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=546&year=2018, accessed June 5, 2019.*

[29] *LAFD, FireStatLA, Station 35 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=466&year=2018, accessed June 5, 2019.*

[30] *LAFD, FireStatLA, City Wide Response Metrics for 2018, www.lafd.org/fsla/stations-map?year=2018, accessed June 5, 2019.*

[31] *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-2
Average Emergency and Non-Emergency Medical Service Incidents Response Times

Station	Average Response Time to Emergency Medical Service Incident[a] (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services Incident[a] (Minutes:Seconds)
Fire Station No. 82	6:32	6:21
Fire Station No. 27	6:22	5:58
Fire Station No. 76	7:50	7:38
Fire Station No. 52	6:23	6:08
Fire Station No. 35	6:09	5:54
Citywide	6:36	6:24

[a] *Response times are based on January–December 2018 data.*

Source: LAFD, FireStatLA, Station 82 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=681&year=2018, accessed June 5, 2019; LAFD, FireStatLA, Station 27 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=441&year=2018, accessed June 5, 2019; LAFD, FireStatLA, Station 76 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=656&year=2018, accessed June 5, 2019; LAFD, FireStatLA, Station 52 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=546&year=2018, accessed June 5, 2019; LAFD, FireStatLA, Station 35 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=466&year=2018, accessed June 5, 2019; LAFD, FireStatLA, City Wide Response Metrics for 2018, www.lafd.org/fsla/stations-map?year=2018, accessed June 5, 2019.

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.[32] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS[33].

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is only 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. 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 Trustee of California State University* (2015) ruling, the City has and will continue to

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

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

meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a 6,393 square foot low-rise commercial building and surface parking areas. Vehicular access, including emergency vehicle access, to the Project Site is provided via an ingress and egress driveway along Vine Street.

(3) Fire Water Infrastructure

As discussed in Section IV.L.2, 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 24-inch water main in Vine Street. The Project Site has two domestic water connections off Vine Street, an existing 1.5-inch service, and an existing 1-inch connection, which is no longer in use.

The Utility Report identified an existing LAFD connection that provides water service to fire sprinklers on the building face along Vine Street. This connection would be removed with the demolition of the existing building and replaced with new connection to meet all LAFD and City of Los Angeles Department of Building and Safety (LADBS) regulations. The Utility Report also identified an existing 4-inch fire service along Vine Street and six existing fire hydrants located within the vicinity of the Project Site.[34] Of the six fire hydrants, two fire hydrants closest to the Project Site are located approximately 160 feet north and approximately 170 feet south of the Project Site along Vine Street.

(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.[35] However, the Project Site is located in Fire District No. 1, which consists

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[34] *KPFF Consulting Engineers, 1718 Vine Street Project, Utility Infrastructure Technical Report: Water, May 2018.*

[35] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1718 N. Vine St., http://zimas.lacity.org/, accessed February 28, 2019.*

of areas identified by the City that are required to meet additional development regulations to reduce fire hazard-related risks.[36]

(5) Reorganization by the LAFD[37]

In January 2015, the LAFD initiated a major reorganization of the Department's Emergency Services Bureau, creating four distinct geographic bureaus, each with a Deputy Chief reporting directly to the LAFD Chief Deputy of Emergency Operations. The objective of this reorganization is for each new Bureau Commander and their staff to establish a more effective and responsive business model than has been previously possible through the traditional rotating shift, platoon duty system. The bureaus will operate during normal weekday business hours and bureau commanders and staff will be available 24 hours each day to respond to significant emergencies.

The four bureaus, Central (at Fire Station No. 3 near the downtown Civic Center), South (at the San Pedro City Hall complex), Valley (at Fire Station No. 88 in Sherman Oaks) and West (at Fire Station No. 82 in Hollywood), bring the LAFD more in line with the established organizational model now in use by the LAPD. Similar to the LAPD, the new four-bureau system intends to make the LAFD more effective and responsive to community needs.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines 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.

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[36] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1718 N. Vine St., http://zimas.lacity.org/, accessed February 28, 2019.*

[37] *LAFD Implements New Bureau Command Structure, January 12, 2015, http://lafd.org/news/lafd-implements-new-bureau-command-structure, accessed June 5, 2019.*

For this analysis the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

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.

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. 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 EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection and emergency medical services from a project is determined by whether construction of new or expanded fire protection and emergency medical 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 impact area. 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 expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration.

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 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.

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); Section 57.4705.4 of the LAMC related to emergency helicopter landing facilities (as well as LAFD Requirement No. 10 to allow exceptions); and Section 57.507.3.1 of the LAMC regarding fire flow requirements. No specific project design features beyond those required by these regulatory requirements are proposed with regard to fire protection.

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

d. Analysis of Project Impacts

Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, 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) 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, Occupational Safety and Health Administration (OSHA) has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those

set forth in the Safety and Health Regulations for Construction established by OSHA.[38] Additionally, in accordance with the provisions established by OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[39] 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.

Construction of the Project 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 affect emergency response for emergency vehicles along Vine Street, adjacent to the Project Site, and other main connectors surrounding the Project Site due to increased 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 to the extent feasible, 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-1 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. 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

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[38] *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed June 5, 2019.*

[39] *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed June 5, 2019.*

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 right-of-ways. Further, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to California Vehicle Code (CVC) Section 21806. Moreover, although the average response times listed above in Table IV.F.1-2 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 are not considered deficient. 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.

Based on the above, temporary construction activities associated with the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service. Therefore, construction of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, need for new or physically altered 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. As such, impacts to fire protection and emergency medical services during Project construction would be less than significant, and no mitigation measures are required.

(2) Operation

The analysis of the Project's operational impacts on LAFD services addresses potential impacts associated with LAFD resources and equipment, response distances and access, and the ability of the fire water infrastructure system to provide the necessary fire flows.

(a) Facilities and Equipment

The Project Site is expected to continue to be served by Fire Station No. 82, the "first-in" station, and Fire Station No. 27. In addition, although located beyond the specified response distance requirements, Fire Station Nos. 76, 52, and 35 have been identified by the LAFD to be available to serve the Project Site in the event of an emergency.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by a 6,393 square foot low-rise commercial building and surface parking areas that currently generate limited demand for LAFD fire protection and emergency medical services. Since the Project Site does not contain any housing units, there are

currently no residents on the Project Site that would require LAFD fire protection and emergency medical services. The Project would include the development of a 13-story hotel with 240 guest rooms, approximately 2,742 square feet of guest amenities, and approximately 5,373 square feet of shared guest and public spaces. The proposed hotel use on the Project Site would not generate a new residential population in the service area of Fire Station No. 82 but would generate a fluctuating guest population of up to approximately 240 persons that may require LAFD fire protection and emergency medical services.[40]

With regard to employment, the Project's 73,440 square feet of hotel uses would generate approximately 83 employees, based on employee generation rates promulgated by the Los Angeles Unified School District (LAUSD).[41] The Project Site's existing commercial building is estimated to generate approximately 18 employees, based on LAUSD's employee generation rates.[42] Thus, the Project is estimated to generate a net of 65 new employees on-site. Therefore, the Project's employee population would increase the demand for LAFD fire protection and emergency medical services compared to the existing conditions.

Pursuant to LAMC Section 57.4705.4, the Project would be required to provide an emergency helicopter landing facility (EHLF) since the proposed building is over 75 feet in height. However, LAFD Requirement No. 10 would allow an exception to the LAMC's EHLF requirement if specific life safety features are provided. High-rise buildings over 120 feet, but less than 240 feet (such as the Project), would be required to provide the following life safety features:[43]

- Two fire service access elevators as required in the 2013 California Building Code 403.6.1.
- Two stairways with roof access through a penthouse that complies with the 2014 Los Angeles Building Code Section 91.1509.2;
- Enclosed elevator lobbies in accordance with 2014 Los Angeles Fire Code Section 57.4705.1;

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[40] *LAFD does not provide generation factors for service populations for hotel uses. Due to the size and nature of the hotel, as described in Section II, Project Description, of this Draft EIR, it is estimated that hotel occupancy would be on average one person per room.*

[41] *Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017, Table 14. Based on the employee generation rate of 0.00113 employee per average square foot for "Lodging."*

[42] *Based on the employee generation rate of 0.00271 employee per average square foot for "Neighborhood Shopping Centers."*

[43] *LAFD, Office of the Fire Marshal, Los Angeles Fire Department Requirement No. 10, revised 11/17/2014.*

- Escalator openings or stairways that are protected by approved power-operated automatic shutters at every penetrated floor, if they are not part of the means of egress system and connect to more than two stories, in conformance with 2014 Los Angeles Building Code Section 91.712.1.3.2;

- A Video Camera Surveillance System with cameras located in all firefighter elevator vestibules and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shafts, with an additional camera at the top of the exit stairway shaft;

- An automatic sprinkler system installed throughout the building, designed in accordance with Section 57.903.3.1 of the Los Angeles Fire Code; In light and ordinary hazard areas, other than parking garages, listed quick-response sprinklers, including extended coverage quick-response sprinklers, shall be used throughout the system.

Accordingly, the Project would implement the above listed life safety features in compliance with LAFD Requirement No. 10. Thus, the Project would not be required to provide an EHLF. In addition, the Project would implement all applicable Los Angeles 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 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 Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. In addition, in accordance with the fire protection-related goals, objectives, and polices set forth in the Framework Element, the Safety Element, and the Hollywood 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, impacts with regard to LAFD facilities and equipment would be less than significant.**

(b) Response Distance and Emergency Access

Pursuant to Section 57.507.3.3 of the LAMC, for land uses in the Industrial and Commercial category, which includes the Project, the maximum response distances from

fire stations with an engine company and from fire stations with a truck company are 1.0 mile and 1.5 miles, respectively. As discussed above and shown in Table IV.I-1 on page IV.I-11, Fire Station No. 82, which would serve as the "first-in" fire station to the Project Site, is located approximately 0.7 mile east of the Project Site, has a single engine company, paramedic rescue ambulance, and a staff of six. Therefore, the Project would fall within LAFD's maximum prescribed response distances from a fire station with an engine company and a truck company. In addition, Fire Station No. 27, which is located approximately 0.8 mile southwest of the Project Site, would also be available to serve the Project Site. As discussed above, Fire Station No. 27 is equipped with a task force truck and engine company, paramedic rescue ambulance, EMT rescue ambulance, and a staff of 14. As such, the Project would be located within the appropriate distance of two fire stations that are adequately equipped in accordance with LAMC requirements.

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided via a driveway off of Vine Street. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. Project-related traffic would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel delays caused by traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. As discussed in Section IV.J, Transportation, of this Draft EIR, with implementation of mitigation measures, traffic generated by the Project would not result in significant impacts to Project area intersections, including intersections along Santa Monica Boulevard and Highland Avenue, which are City-designated disaster routes. In addition, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle response times to the Project Site and surrounding area. Furthermore, the Project's driveways and internal circulation would be designed to incorporate all applicable LABC and Los Angeles Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable LABC and Los Angeles 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 Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. Accordingly, Project-related traffic is not anticipated to impair the LAFD

from responding to emergencies at the Project Site or the surrounding area. **Impacts related to response distance and emergency access would be less than significant.**

(c) Fire Flow

As described in Section IV.L.2, 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, Section 57.507.3.1 of the LAMC establishes fire flow standards by development type. As determined by the LAFD, the Project falls within the Industrial and Commercial land use category, which has a required fire flow of 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously with a residual pressure of 20 psi. Additionally, hydrants must be spaced to provide adequate coverage of the building exterior, as set forth in Section 57.507.3.2 of the LAMC, and must deliver a minimum pressure of 20 psi at full flow. As previously stated, there are currently six existing public fire hydrants in the vicinity of the Project Site. Of the six fire hydrants, the two fire hydrants closest to the Project Site are located approximately 160 feet north and approximately 170 feet south of the Project Site along Vine Street. As discussed in the Utility Report, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP to determine available fire hydrant flow from the six existing public fire hydrants. Based on completed IFFAR (see Exhibit 1 of Appendix J to this Draft EIR), the six existing public fire hydrants can deliver combined flows up of to 9,000 gpm with a minimum residual pressure of 61 psi, which far exceeds the 20 psi requirement for the surrounding public hydrants. As such, the Project would comply with flow standards specified in Section 57.507.3.1 of the LAMC. **Therefore, impacts related to fire flow would be less than significant.**

(d) Conclusion

Based on the analysis above, operation of the Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, need for new or physically altered facilities, the construction of which would cause significant environmental effects, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, impacts would be less than significant, and no mitigation measures are required.

4. Cumulative Impacts

The geographic context for the cumulative impact analysis for fire protection and emergency medical services are the service areas of Fire Station Nos. 82, 27, 76, 52, and 35. The Project, in conjunction with growth forecasted in the City through 2022 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection service, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2022 includes 106 specific known development projects, growth that may be projected as a result of the Hollywood Community Plan Update, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 106 is a conservative assumption, as some of the related projects may not be built out by 2022 (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 106 are fully built out by 2022, unless otherwise noted. Related Project No. 107 is the Hollywood Community Plan Update, which once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2022, well before the Community Plan Update's horizon year. Moreover, 2022 is a similar projected buildout year as many of the 106 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 number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 82, 27, 76, 52, and 35. The increase in development populations from the Project, related projects, as well as other future development in the Hollywood Community Plan area, would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services if the Project, together with other development in the service area, does not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects and other future development projects in the Hollywood Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project and other future development projects in the Hollywood Community Plan area would be required to comply with regulatory requirements related to fire protection and emergency medical services. In addition, the Project and each related project would be subject to the City's standard construction permitting process, which

includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects identified in the area, and other future development projects in the Hollywood Community Plan area, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. The Project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.[44] Cumulative increases in demand for fire protection services due to related projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. LAFD would also continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Furthermore, 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, the Community Plan area is highly developed, and the site of a fire station would foreseeably be an infill lot less than 1 acre in size which would meet the requirements for the use of a Class 32 categorical infill exemptions (CEQA Guidelines Section 15332). 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 *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area. If LAFD

[44] *City of Los Angeles, Budget for the Fiscal Year 2017–18.*

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 located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and 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.

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

5. Mitigation Measures

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

6. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant without mitigation.