IV. ENVIRONMENTAL IMPACT ANALYSIS

H. PUBLIC SERVICES: FIRE

1. ENVIRONMENTAL CONDITIONS

a. Physical Setting

Fire protection and emergency medical service to the project site is provided by the Los Angeles Fire Department (LAFD). The LAFD responds to incidents requiring fire protection and emergency medical care with LAFD personnel and emergency medical technicians. According to the LAFD, fire protection services would primarily be provided by three fire stations. They are the closest to the project site and would potentially provide the shortest response time in the event of an emergency. All three primary-serving LAFD fire stations are located within 2.5 miles of the project site. These stations include:

Fire Station No. 102 13200 Burbank Boulevard Sherman Oaks, CA 91423	Task Force Station (Truck & Engine Company) Distance to Site: Approximately 2.0 miles
Fire Station No. 88 5101 Sepulveda Boulevard Sherman Oaks, CA 91403	Task Force Station (Truck & Engine Company) Air Utility, Hazardous Materials Unit Distance to Site: Approximately 1.9 miles
Fire Station No. 39 14415 Sylvan Street Van Nuys, CA 91401	Task Force Station (Truck & Engine Company) Rescue Ambulance Distance to Site: Approximately 2.5 miles

Fire Station No. 102, which is located approximately 2.0 miles northeast of the project site, is designated by the LAFD as the jurisdictional fire station that would be "first-due" to the project site; however, any one of the three stations above could provide the initial response under normal conditions. If necessary during a major emergency, additional fire protection and emergency services would be provided by other stations within the LAFD system.

The adequacy of fire protection is based on the required fire-flow (measured in gallons per minute), response distance from existing fire stations and the Fire Department's judgment for needs in the area. Based on preliminary input from LAFD[1], the project site is currently considered to be adequately served by LAFD services.

b. Regulatory and Policy Setting

The Fire Protection and Prevention Plan (FPPP) of the City of Los Angeles provides an official guide to City Departments, other governmental agencies, developers and interested citizens for the construction, maintenance and operation of fire facilities. It is intended to promote fire

[1] Los Angeles Fire Department Hydrants & Access Unit, Terry O'Connell, telephone contact on August 2007.

prevention by maximizing fire safety and education and minimizing loss of life through fire prevention programs.

The Van Nuys-North Sherman Oaks Community Plan (Community Plan) includes goals, objectives and policies that specifically address policy-level guidelines for fire protection services in the project area. In summary, the Community Plan establishes policies that strive to ensure that adequate levels of fire protection services are provided and maintained, and to provide comprehensive fire protection and life safety support for all current and future population and land uses.

Specific fire protection related policies that are applicable to the project area are listed below in this section under the Consistency with Applicable Plans and Policies discussion. For an analysis of the Proposed Project's consistency with other land use policies of the Community Plan, please refer to Section IV: Environmental Impact Analysis: F-Land Use, Planning and Urban Decay, of this DEIR.

Neither the project site, nor the immediate surrounding vicinity, is located within a special fire hazard zone, such as a Very High Fire Hazard Severity Zone or a Brush Clearance Zone (previously referred to as a Mountain District Zone and Buffer Zone, respectively).

The LAMC and the Building Code includes many regulations that address fire protection, life safety and emergency access requirements that are implemented in development projects. Often, adherence with mandated code requirements serves to adequately mitigation most fire safety concerns for development projects. Specific applicable fire code requirements are identified later in this section.

2. THRESHOLDS OF SIGNIFICANCE

Unless otherwise indicated, the thresholds of significance identified in this section and used to determine the proposed project environmental effects are based on direction from the Los Angeles CEQA Thresholds Guide (as adopted 2006).

The City of Los Angeles CEQA Significance Thresholds for fire protection indicates that a project could result in a significant impact to 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.

3. ENVIRONMENTAL IMPACTS

a. Relevant Project Characteristics

The Proposed Project involves the intensification of land uses at the project site through the addition of 280,000 GLSF of commercial use structures, and the reconfiguration of the internal site circulation to provide more efficient and direct access throughout the project site.

The site design and project operational characteristics have incorporated characteristics that would improve and enhance fire protection and life.

The analysis assumes that the following Project Design Features are supported by the Proposed Project:

- Fashion Square Lane will be reconfigured and improved to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) for its entire length along the south edge of the shopping center from Hazeltine Avenue to Riverside Drive. This fire lane shall be unobstructed except for the connection from the existing west parking structure to the new mall. However, this limited area shall have a minimum vertical clearance of 17 feet.

- New Proposed Project buildings, including parking structures, shall be fully sprinklered.

The analysis assumes that the Proposed Project will be constructed and operated in accordance with all applicable codes, regulations and standard practices, including the following:

- The Proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, which is an element of the General Plan of the City of Los Angeles (CPC 19708).

- In accordance with the City of Los Angeles building permit review process, definitive plans and specifications shall be submitted to the Fire Department and any requirements for necessary permits shall be satisfied prior to commencement and/or occupation of any portion of the Proposed Project. Typical site plan and building permit requirements would include, but not be limited to, the following:

    - All first story portions of any habitable building shall be within 300 feet of an approved fire hydrant.

    - A building smoke alarm system designed to detect any smoke in the building's air-handling systems shall be installed. The system shall cause an alarm to be announced at the central fire control station.

    - A fire alarm system shall be installed which uses a dependable method of sounding a fire alarm throughout the building.

    - All decorative landscaping surrounding project structures shall use fire-resistant plants and materials.

    - Brush in the area adjacent to proposed development shall be cleared or thinned periodically by the applicant under supervision of the LAFD.

- New fire hydrants and/or top upgrades to existing fire hydrants shall be installed in accordance with the Los Angeles Fire Code.

- Adequate public and private fire hydrants will be required. The number and location of these hydrants will be determined by the Fire Department after review of the Plot Plan.

- Access for Fire Department apparatus and personnel to and into all structures shall be required.

- At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.

- Fire lanes, where required, and dead-ending streets should terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane should be greater than 700 feet in length or secondary access shall be required.

- Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane, unless otherwise approved.

- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

- Additional vehicular access may be required by the Fire Department where buildings exceed 35 feet in height.

- Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

- The Project shall utilize standard cut-corners on all turns, if applicable.

- Fire Department access shall remain clear and unobstructed during demolition.

- If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the

outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

- Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

b. Project Impacts

The adequacy of fire protection services for the Proposed Project is based on required fire flow, response distance from existing fire stations, equipment access, and the LAFD's judgment regarding needs and service in the project area.

(1) Fire Flow

Fire flow is the quantity of water available (or needed) for fire protection. Fire flow is described in terms of volume and water pressure and is generally measured by gallons per minute (gpm) and duration of the flow. The quantity of water required for fire protection varies based on land use(s). Fire flow requirements vary from 2,000 gpm in Low-Density Residential areas to 12,000 gpm in high-density commercial areas.

Based on a review of the Proposed Project land uses, the LAFD has indicated that a fire flow of 9,000 gpm from any 4 to 6 hydrants on the same block flowing simultaneously is required. A minimum residual water pressure of 20 psi must remain in the system while the required fire flow is being delivered. The actual number and location of required fire hydrants would be determined during the Fire Department's review of the finalized plot plan.

Currently, adequate water pressure is available to serve the Proposed Project and other land uses in the project vicinity. The existing system has a fire flow capacity of at least 9,000 gpm, which meets LAFD required fire flow for both the existing shopping center and the Proposed Project.

The Proposed Project would expand existing retail facilities with similar uses. As a result, the required fire-flow at the site is not anticipated to change. Additional fire hydrants, spaced and sized according to LAMC requirements, will be implemented during building construction based on the approved site plan. Temporary water supplies for fire protection during the construction activities will also be provided in accordance with LAFD recommendations.

Due to the adequacy of existing fire flow, and that the Proposed Project would not alter fire flow requirements at the project site due to a change in use, upgrades to the fire flow system are not anticipated. The Proposed Project will result in a less than significant impact to fire flow capacity and fire protection services.

(2) Fire Protection Facilities and Service

Fire protection facilities and service include equipment and personnel operated through the LAFD, or affiliate agencies, which respond to emergency calls. Typical facilities include fire stations, fire trucks, personnel and necessary apparatus. Other specialized facilities may include helicopters and hazardous materials response units.

The LAFD requires that all projects either: (1) be located within 1.5 miles of the nearest fire station, or (2) if this distance cannot be achieved, include an interior sprinkler system in the development as a means of fire protection.

The project site is currently developed and is considered to be adequately served by LAFD services. However, Fire Station No. 102, which is designated by the LAFD as the fire station that services the project site, is located approximately 2.0 miles northeast of the project site and exceeds the guideline proximity target distance of 1.5 miles. Under the LAFD criteria, the Proposed Project would be required to include an interior sprinkler system.

The Proposed Project would install an automatic fire sprinkler system and two electric/emergency driven fire pumps with a combined capacity of 1,250 gallons per minute.

LAFD has indicated that intersections operating with a Level of Service (LOS) of E or F can have impacts on fire protection services. Ambient traffic increases, as well as potential traffic impacts resulting from the proposed and related projects, could result in a LOS of E or F during peak hours at intersections throughout the San Fernando Valley. Column [1] of *Table 45: Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours* and *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hour*, in Section IV: Environmental Impact Analysis: J-Traffic, Circulation and Access, identifies intersections within the project area that currently operate at an LOS or E of F. Column [3] of *Table 45: Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours* and *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hour*, indicates the number of intersections that are anticipated to operate at a LOS of E or F in the future without the project.

As identified in the Column [5] of *Table 45: Summary of Volume to Capacity Ratios and Levels of Service Weekday AM and PM Peak Hours* and *Table 46: Summary of Volume to Capacity Ratios and Levels of Service Weekend Peak Hour*, the Proposed Project will not increase the number of intersections operating at a LOS of E or F and will not decrease the LOS at intersections already operating at these conditions. The Proposed Project will not result in a significant impact on fire services due to intersection conditions, and the Proposed Project would not significantly impact response times.

Because existing fire protection services are considered to be adequate at the project site, and development of the Proposed Project with the incorporation of the PDFs will not necessitate new additional fire station facilities or personnel, the Proposed Project will result in a less than significant impact to fire protection facilities and services.

(3) On-Site Fire Safety Design and Operations

The current site design includes a proposed fire/emergency vehicle lane along the southern property boundary, extending from Woodman Avenue to Hazeltine Avenue via Fashion Square Lane. Discussions with the LAFD to date indicate acceptable circulation for emergency vehicles and fire protection with this design.

The Proposed Project would maintain adequate access for the LAFD. Compliance will be confirmed by the LAFD during plot plan review prior to construction. The Proposed Project would not result in a significant impact on fire department access to the proposed site or adjacent properties.

(4) Consistency with Applicable Plans and Policies

The Proposed Project does not propose any change to adopted Plans or policies, nor reclassification of applicable designations. The applicable fire service related goals, objectives and policies of the Van Nuys-North Sherman Oaks Community Plan are provided in *Table 34: Consistency with Community Plan Fire Protection Services Related Goals, Objectives and Policies*, along with a discussion of the project consistency with each applicable component. In summary, the Proposed Project is consistent with the fire protection services related goals, objectives and policies because the project either directly contributes toward the furtherance of those policies (i.e., as through physical site improvements) or indirectly supports those policies by not creating obstacles for their realization (i.e., such as remaining consistent with land use goals). The Proposed Project will result in a less than significant impact to fire protection services in the project area due to conflicts with policies and programs supporting the provision for adequate and comprehensive fire and life safety services.

TABLE 34
CONSISTENCY WITH COMMUNITY PLAN FIRE PROTECTION RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
VAN NUYS-NORTH SHERMAN OAKS COMMUNITY PLAN			
G 10	Protect the community through a comprehensive fire and life safety program.	The Proposed Project is consistent with this goal because it incorporates design and operational measures (i.e., on-site fire hydrants and sprinklered structures) that will reduce the demand on available fire facilities and services. Further, design elements are included to enhance the overall safety of both mall occupants and the general public safety in the immediate vicinity. Please refer to the analysis of fire protection services in Section IV: Environmental Impact Analysis: H-Public Services: 1-Fire, of this EIR.	Consistent

TABLE 34 (CONTINUED)
CONSISTENCY WITH COMMUNITY PLAN FIRE PROTECTION RELATED GOALS, OBJECTIVES AND POLICIES

ID NO.	GOAL/OBJECTIVE/POLICY	CONSISTENCY DISCUSSION	CONSISTENCY DETERMINATION
O 10-1	Ensure that fire facilities and protection services are sufficient for the existing and future population and land uses.	The Proposed Project is consistent with this objective because the project design reflects fire safety components (i.e., on-site fire hydrants and improved emergency access) that will reduce demand for services thereby providing for a more efficient utilization of available fire protection facilities and personnel throughout the service area. Additionally increased City revenues generated by the project will be available to fund fire protection services to levels appropriate for the demand.	Consistent
P 10-1.1	Coordinate with the Fire Department as part of the review of significant development projects and the General Plan Amendments affecting land use to determine the impact on service demands.	The Proposed Project is consistent with this policy as the applicant has already initiated and will continue to coordinate with, and obtain input from, the Fire Department in order to determine the potential impacts to fire protection services and identify appropriate design modifications and mitigation measures. Please refer to the analysis of fire protection services in Section IV: Environmental Impact Analysis: H-Public Services: 1-Fire, of this EIR.	Consistent

(5) Cumulative Impacts

Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on fire protection services. A review of the related projects indicates that there are no General Plan Amendment cases requested. As such, the identified related projects are presumed to be consistent with growth impacts within the Community Plan Area. Any cumulative development would be subject to fire protection and safety measures, as with the proposed Project, to adequately mitigate fire protection impacts. The related projects would be required to comply with all LAFD development review criteria. Further population increases within the fire service area due to cumulative growth would not increase above anticipated Community Plan levels, and, would not result in a significant related projects impact on fire services.

As discussed above, the Proposed Project will result in a less than significant impact to fire protection, and fire response effectiveness will not be impacted by traffic congestion from the Proposed Project as all project-related roadway impacts will be fully mitigated. Hence, the Proposed Project will not contribute to a cumulative impact to fire protection. The Proposed

Project would have a less than significant impact and would not substantially contribute to cumulative impacts.

4. MITIGATION PROGRAM

Compliance with the LAMC will be required. Many of the LAMC requirements serve to reduce fire safety concerns to less than significant levels.

MM PSF-1: The Proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, which is an element of the General Plan of the City of Los Angeles (CPC 19708).

MM PSF-2: In accordance with the City of Los Angeles building permit review process, definitive plans and specifications shall be submitted to the Fire Department and any requirements for necessary permits shall be satisfied prior to commencement and/or occupation of any portion of the Proposed Project. Typical site plan and building permit requirements would include, but not be limited to, the following:

- All first story portions of any habitable building shall be within 300 feet of an approved fire hydrant.
- A building smoke alarm system designed to detect any smoke in the building's air-handling systems shall be installed. The system shall cause an alarm to be announced at the central fire control station.
- A fire alarm system shall be installed which uses a dependable method of sounding a fire alarm throughout the building.
- All decorative landscaping surrounding project structures shall use fire-resistant plants and materials.
- Brush in the area adjacent to proposed development shall be cleared or thinned periodically by the applicant under supervision of the LAFD.
- New fire hydrants and/or top upgrades to existing fire hydrants shall be installed in accordance with the Los Angeles Fire Code.
- Adequate public and private fire hydrants will be required. The number and location of these hydrants will be determined by the Fire Department after review of the Plot Plan.
- Access for Fire Department apparatus and personnel to and into all structures shall be required.

- At least two different ingress/egress roads for each area, that will accommodate major fire apparatus and provide for major evacuation during emergency situations shall be required.

- Fire lanes, where required, and dead-ending streets should terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane should be greater than 700 feet in length or secondary access shall be required.

- Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane, unless otherwise approved.

- Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

- Additional vehicular access may be required by the Fire Department where buildings exceed 35 feet in height.

- Private streets and entry gates will be built to City standards to the satisfaction of the City Engineer and the Fire Department.

- The Project shall utilize standard cut-corners on all turns, if applicable.

- Fire Department access shall remain clear and unobstructed during demolition.

- If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

- Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to

withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

MM PSF-3: Fashion Square Lane will be reconfigured and improved to provide a minimum of two unobstructed vehicle travel lanes (one per each direction) for its entire length along the south edge of the shopping center from Hazeltine Avenue to Riverside Drive. This fire lane shall be unobstructed except for the connection from the existing west parking structure to the new mall. However, this limited area shall have a minimum vertical clearance of 17 feet.

MM PSF-4: New Proposed Project buildings, including parking structures, shall be fully sprinklered.

5. SIGNIFICANT PROJECT IMPACTS AFTER MITIGATION

The implementation of the identified standard conditions of approval and project design features (incorporated into the Mitigation Program above) reduce all potential Proposed Project and cumulative impact to less than significant levels.