Table of Contents

K.1 Public Services - Fire Protection

List of Tables

List of Figures

IV. Environmental Impact Analysis

K.1 Public Services - Fire Protection

1. Introduction

This section analyzes the proposed Project's impacts relative to the fire and emergency medical services provided by the City of Los Angeles Fire Department (the "City Fire Department") and the Los Angeles County Fire Department (the "County Fire Department"). The analysis evaluates the impact of the Project relative to City Fire Department and County Fire Department service capacity, fire flow requirements, emergency response times and distances, and fire safety equipment and facilities required by the County and City Fire Codes for new construction. This section is based on information provided by the City Fire Department and the County Fire Department.

Based on information received from the City Fire Department and the County Fire Department, facilities serving the Project Site were identified and a determination was made as to whether the facilities serving the Project Site are adequate to meet the fire suppression requirements associated with the occupancy of the Project Site. Based on this assessment, a determination was then made as to whether the projected on-site populations and land uses, as proposed under the Project, would exceed the capabilities of these City Fire Department and County Fire Department facilities to provide adequate fire suppression services at the Project Site, and therefore result in the need for additional facilities, staffing, and/or equipment.

2. Environmental Setting

a. City of Los Angeles Fire Department

(1) Operational Characteristics

Within the City of Los Angeles, fire prevention, suppression, and life safety services are provided by the City Fire Department, as mandated by Article 10, Section 130 of the City of Los Angeles Charter and Section 22.70 of the Los Angeles Administrative Code. The Los Angeles Fire Code, a portion of the Los Angeles Municipal Code, prescribes laws for the safeguarding of life and property from fire, explosion, panic or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises,

and such other laws as it may be the City Fire Department's duty to enforce.[319] The Safety Element of the General Plan, which replaced the 1979 Fire Protection and Prevention Plan, serves as a guide to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed by the Safety Element include the following: (1) fire station distribution and location; (2) required fire flow (i.e., water supply); (3) fire hydrant standards and locations; (4) access provisions; (5) emergency ambulance service; and (6) fire prevention activities.[320]

The City Fire Department has 3,594 uniformed personnel and 346 non-uniformed support staff. Services of the City Fire Department include: fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A professionally trained staff of 1,101 firefighters (including 226 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the City Fire Department's 471 square-mile jurisdiction.[321]

(2) Existing Facilities

The Project Site is located within City Fire Department's Division 3, which has jurisdiction over a 243 square-mile area that encompasses mainly the San Fernando Valley. Division 3 is further broken down into five Battalions (Battalions 10, 12, 14, 15, and 17) and, as shown in Figure 205 on page 1684, 37 neighborhood fire stations. The Project Site is located within City Fire Department's Battalion 14, which oversees a 33.1 square-mile area that encompasses the communities of Studio City, North Hollywood, Sherman Oaks, and Toluca Lake.

As shown in Figure 206 on page 1685, there are six (6) City Fire Department fire stations currently serving the City of Los Angeles portion of the Project Site (i.e., approximately 24 percent of the Project Site). (Please refer to Section II, Project Description, for a detailed analysis of jurisdictional boundaries within the Project Site).

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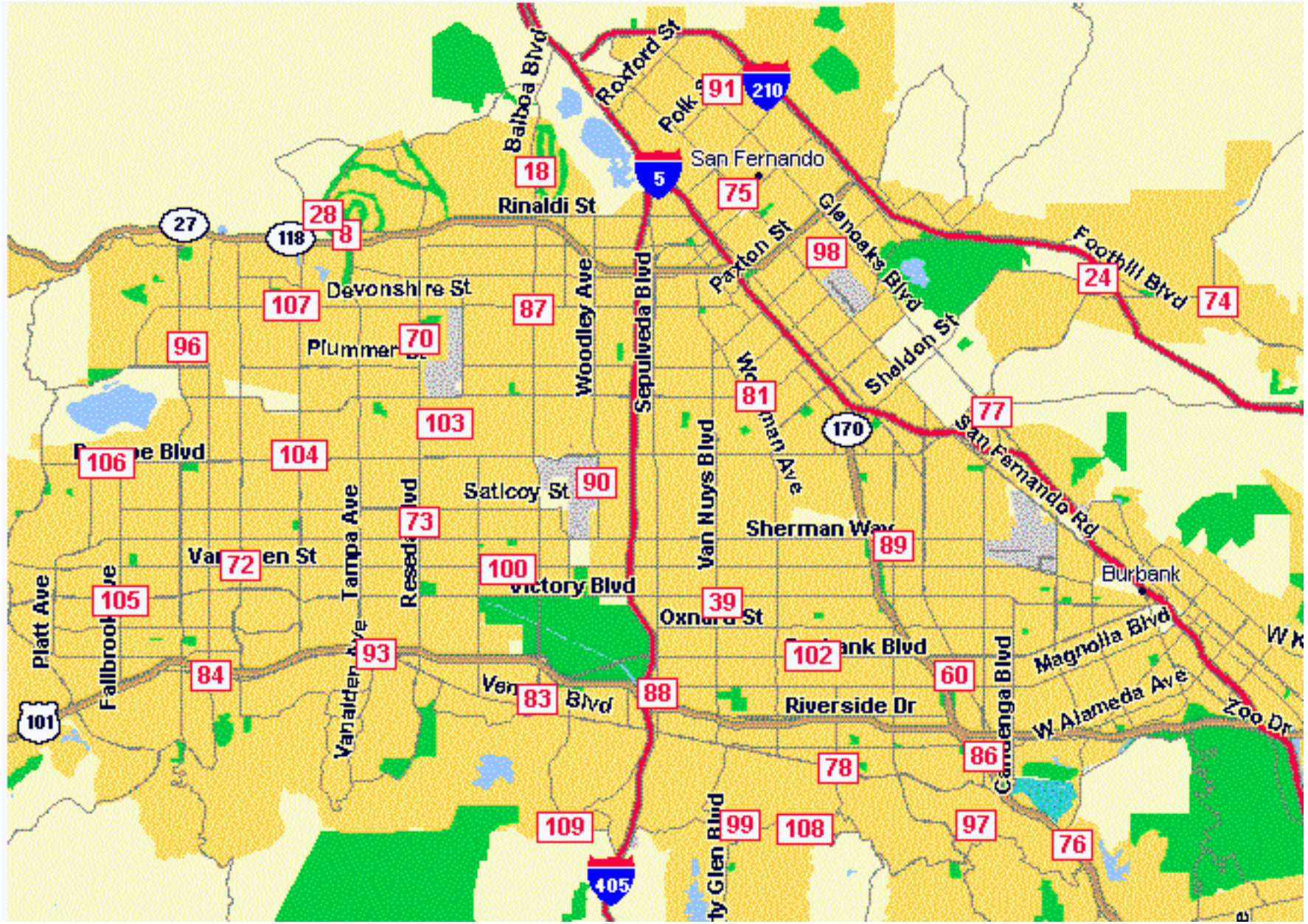
[319] *City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02, amended in Entirety, Ordinance Number 162,123, effective May 12, 1987.*

[320] *Safety Element of the Los Angeles City General Plan, adopted November 26, 1996.*

[321] *Los Angeles Fire Department, About the LAFD, website: http://www.lafd.org/about.htm, July, 2008.*



Source: Matrix Environmental, 2010.

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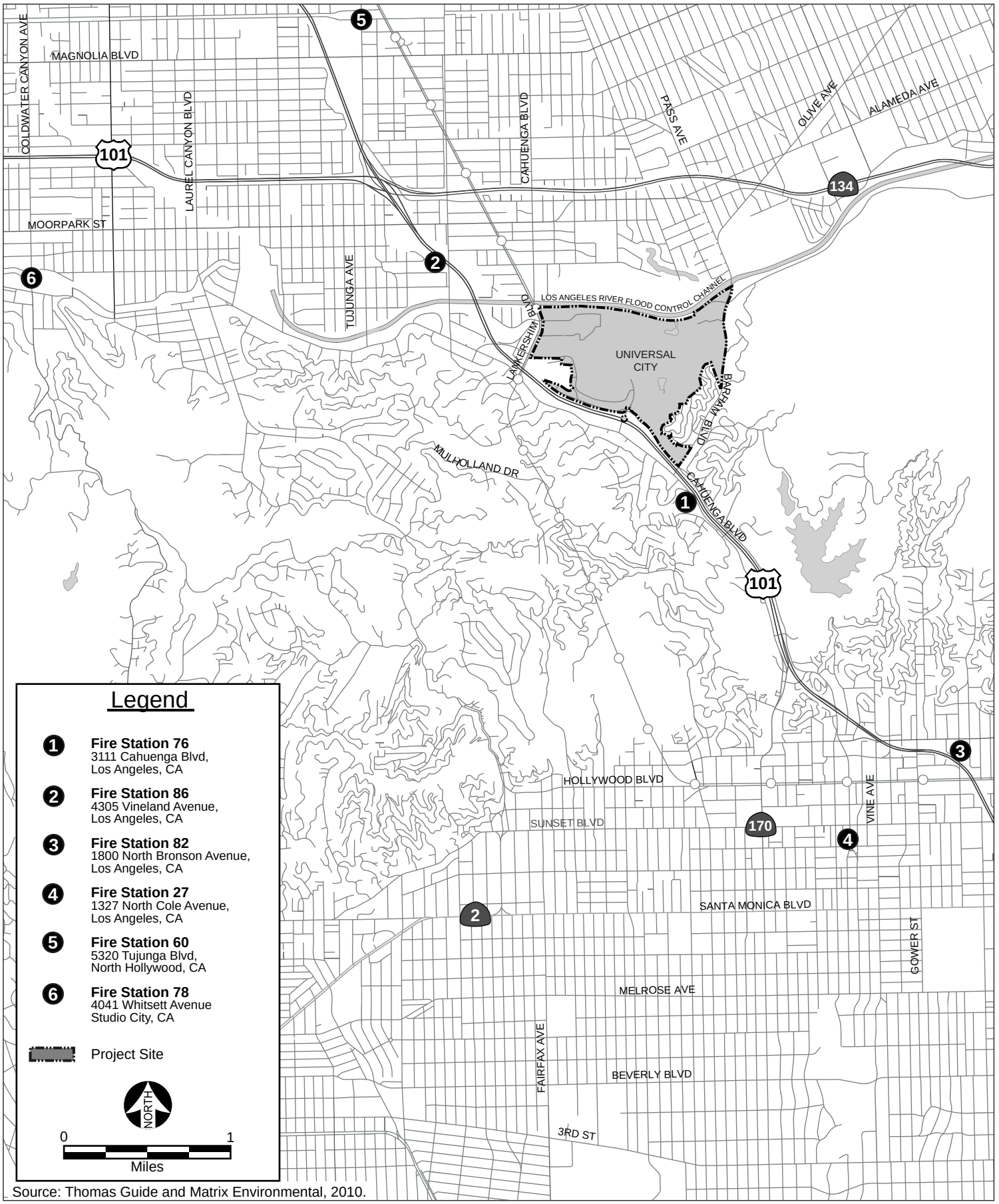
NORTH

Figure 205
City of Los Angeles Fire Department Division 3
Fire Stations



Source: Thomas Guide and Matrix Environmental, 2010.

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Figure 206
City Fire Protection Facilities in the Proposed Project Vicinity

Of the six City Fire Department fire stations (Stations 76, 86, 82, 27, 60, & 78) serving the Project Site, Station 76 is considered the first-due response station and is located at 3111 Cahuenga Boulevard, approximately 0.3 miles south of the southeastern corner of the Project Site. Fire Station 76 is currently equipped with a paramedic rescue ambulance and a single engine company, and is staffed with 6 employees.[322]

To assist in the delivery of fire protection services to the Project Site, City Fire Station 86 would provide assistance on an as-needed basis, and is located approximately 1.9 miles from the Project Site at 4305 Vineland Avenue, as shown in Figure 206 on page 1685. The staff of four at Fire Station 86 is equipped with a paramedic rescue ambulance, emergency medical services Battalion Captain, a single engine company, and a swift water rescue team.[323]

Fire Station 82 would also assist on an as-needed basis, and is located at 1800 North Bronson Avenue, which is approximately 2.7 miles from the Project Site. This Fire Station has six staff and is comprised of a paramedic rescue ambulance and a single engine company.[324]

Fire Station 27 is located at 1327 North Cole Avenue and is situated approximately 2.7 miles from the Project Site. This Fire Station, which is headquarters to Battalion 5, has 15 staff and is comprised of a task force truck and engine company, a paramedic rescue ambulance, an emergency medical team rescue ambulance, and an urban search and rescue team.[325]

Fire Station 60 is located at 5320 Tujunga Avenue, North Hollywood, which is approximately 3.5 miles northwest of the Project Site. Fire Station 60 has 15 staff and is the Battalion 14 headquarters. This Fire Station contains a task force truck and engine company and a paramedic rescue ambulance, an emergency medical team rescue ambulance, and foam tender.[326]

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[322] *Information based on correspondence received from the City of Los Angeles Fire Department, dated July 9, 2010.*

[323] *Ibid.*

[324] *Ibid.*

[325] *Ibid.*

[326] *Ibid.*

Fire Station 78, which recently opened, is located at 4041 Whitsett Avenue, and is located approximately 3.8 miles from the Project Site. Fire Station 78 has a staff of 9 and is comprised of a light force truck and pump company and a paramedic rescue ambulance.[327]

According to the City Fire Department, during 2006-2007, approximately 2,700 incidents (19% fire and 81% medical) occurred within the jurisdiction of Fire Station 76, approximately 6,220 incidents (21% fire and 79% medical) occurred within the jurisdiction of Fire Station 86, and approximately 12,290 incidents (23% fire and 77% medical) occurred within the jurisdiction of Fire Station 60.[328] Information on the number and type of incidents for Fire Stations 82 and 27 during 2006-2007 was not available. Table 144, Existing City Fire Protection Services, on page 1688 provides information on each fire station, including its address, equipment, staff level, and travel distance from/to the Project Site.

The approval of Proposition F in November of 2000 provides funding to support the relocation and expansion of City Fire Department fire stations. According to the City of Los Angeles Fire Department, since 2001 the department has actively been seeking to build new fire stations under the Proposition F bond. Twenty fire stations were approved in 2001; however, the area surrounding the Project Site did not get a new station designated. Several older stations in the Project Site area need to be eventually updated, including Fire Stations 76 and 86, which were built in 1951 and 1961, respectively.

In addition to the six City Fire Department fire stations identified above, under automatic aid agreements, the County Fire Department and Burbank City Fire Department can respond with additional units to the Project Site. The County Fire Department responds with one engine company to a first-alarm fire incident within the Project Site. The City of Burbank responds with two engine companies, one truck, and one battalion chief to a structure fire incident, and one Hazardous Materials Task Force to a hazardous materials incident at the Project Site.

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[327] *Verbal correspondence with Kenny Brady, Fire Captain II, City of Los Angeles Fire Department, December 23, 2008.*

[328] *Information based on correspondence received from the City of Los Angeles Fire Department, Hydrants and Access Unit, dated November 19, 2007.*

Table 144
Existing City Fire Protection Services

Station No. and Address	Equipment	Personnel	Travel Distance
Fire Station 76 3111 Cahuenga Blvd. Los Angeles CA	Paramedic Rescue Ambulance Single Engine Company	6 Staff	0.3 Miles
Fire Station 86 4305 Vineland Avenue Los Angeles, CA	EMS Battalion Captain Paramedic Rescue Ambulance Single Engine Company Swift Water Rescue Apparatus	4 Staff	1.9 Miles
Fire Station 82 1800 North Bronson Avenue Los Angeles, CA	Paramedic Rescue Ambulance Single Engine Company	6 Staff	2.7 Miles
Fire Station 27 1327 North Cole Avenue Los Angeles, CA	Task Force Truck and Engine Company Paramedic Rescue Ambulance Emergency Medical Team Rescue Ambulance Urban Search and Rescue Team	15 Staff	2.7 Miles
Fire Station 60 5320 Tujunga Blvd North Hollywood, CA.	Task Force Truck and Engine Company Paramedic Rescue Ambulance Emergency Medical Team Rescue Ambulance Foam Tender	15 Staff	3.5 Miles
Fire Station 78 4041 Whitsett Avenue Studio City, CA	Light Force Truck and Pump Company Paramedic Rescue Ambulance	9 Staff	3.8 Miles

Source: Matrix Environmental, 2009.

b. Los Angeles County Fire Department

(1) Operational Characteristics

The County Fire Department provides fire prevention, fire protection, and emergency services to 58 incorporated cities (approximately 2,305 square miles), 57 of which are in Los Angeles County and one which is located in Orange County, and all of the unincorporated areas of Los Angeles County.[329] The Los Angeles County Fire Code and

[329] *Written correspondence from Debra Aguirre, Los Angeles County Fire Department, received May 11, 2009.*

Safety Element of the Los Angeles County General Plan establish standards, policies, and goals for the construction, design, and distribution of fire suppression facilities. These policies ensure that such criteria as fire flow, minimum distance to fire stations, public and private fire hydrants, and access provisions for firefighting units are adhered to by new developments taking place within the Los Angeles County Fire Department's jurisdiction.

The County Fire Department, Forestry Division, also implements the policies and recommendations of the California Fire Code into its overall Fire Plan for the County. The Fire Plan, as a guide for fire prevention efforts, develops and enforces fire codes, building codes, pre-fire planning, vegetation management, brush clearance, and fuel modification programs in order to limit the potential threat of wildfires within unincorporated areas of the County.

(2) Existing Facilities

There are currently three County Fire Department stations serving the Project Site and the immediate surrounding areas, with one station acting as the jurisdictional station for the proposed Project. County Fire Department Station 51 is the first-due (jurisdictional) station, and is located in the central portion of the Project Site, as shown in Figure 207 on page 1690. Fire Station 51 is responsible for serving the County portion of the Project Site which constitutes approximately 76 percent of the Project Site (please refer to Section II, Project Description, for a detailed analysis of jurisdictional boundaries within the Project Site). Fire Station 51 is currently equipped with a three-person engine company and two-person paramedic squad.[330]

To assist in the delivery of fire protection services to the Project Site, a pre-planned first alarm assistance program with other County fire stations is in place, in which nearby County fire stations would respond to an incident within the Project Site on an as-needed basis. As such, County Fire Station 8 would provide assistance to Fire Station 51, as needed, and is located in West Hollywood approximately 4.2 miles from the Project Site, as shown in Figure 207 on page 1690, County Fire Protection Facilities in the Proposed Project Vicinity. Fire Station 8 is equipped with a four-person engine company, a seven-person Light Force, and a two-person paramedic squad.[331] A Light Force consists of an engine and a truck responding as a single unit. County Fire Station 7, which might also

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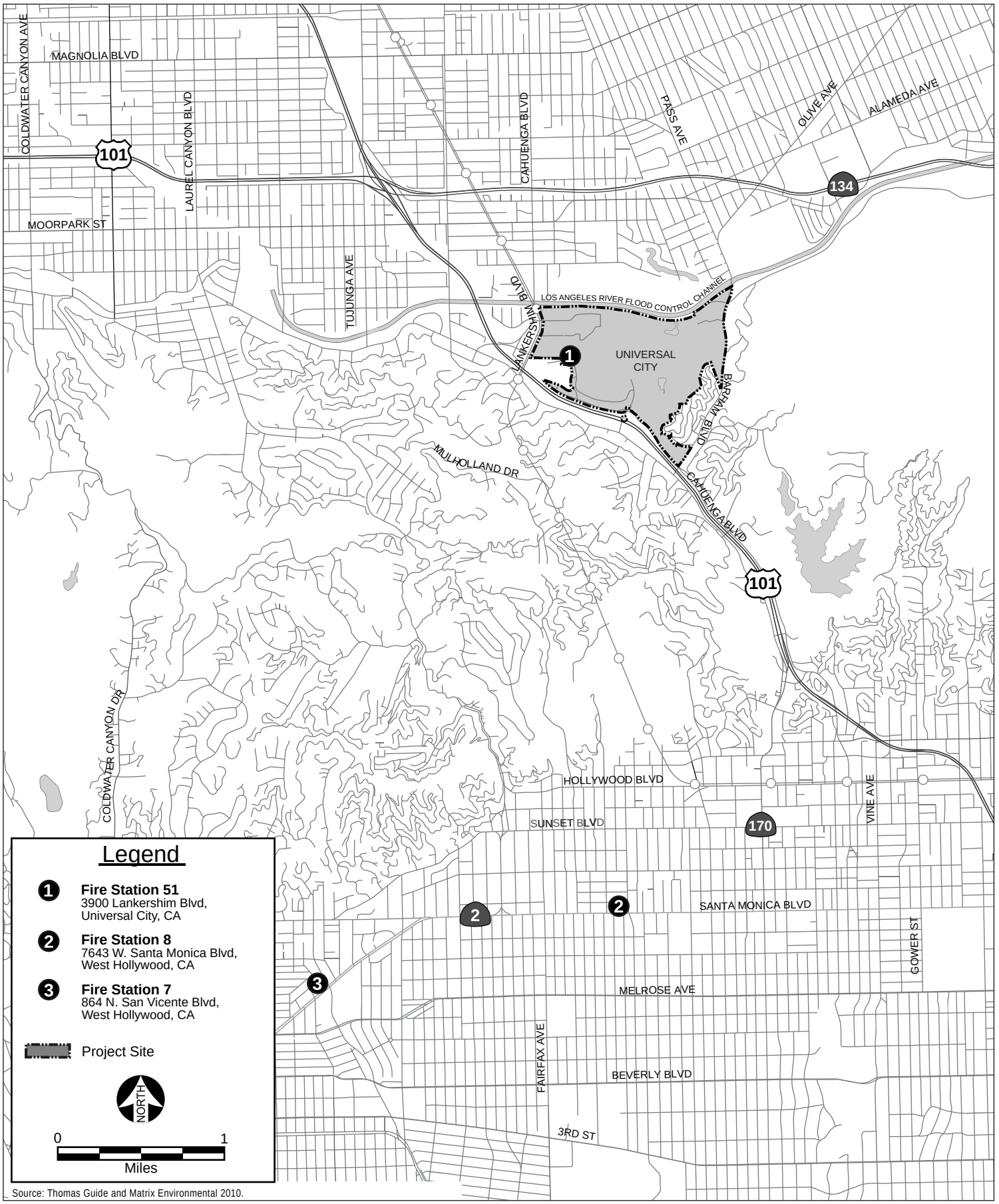
[330] *Written correspondence from Debra Aguirre, Los Angeles County Fire Department, received January 8, 2008.*

[331] *Ibid.*



Source: Thomas Guide and Matrix Environmental 2010.

matrix environmental

Figure 207
County Fire Protection Facilities in the Proposed Project Vicinity

respond to an incident at the Project Site, is also located within West Hollywood approximately 5.8 miles from the Project Site. Fire Station 7 is staffed with a four-person paramedic engine company, a two-person paramedic squad, and a battalion chief.[332]

During 2007, approximately 775 incidents occurred within the jurisdiction of Fire Station 51, approximately 2,709 incidents occurred within the jurisdiction of Fire Station 8, and approximately 1,989 incidents occurred within the jurisdiction of Fire Station 7. Per the County Fire Department, the average number of annual engine responses is 2,000 incidents per fire station, thus, Fire Stations 7 and 8 are considered to have average workloads. Conversely, the number of responses for Fire Station 51 in 2007 is less than half of the average. Table 145, Existing County Fire Protection Services, on page 1692 provides information on each County fire station, including its address, equipment, personnel, and travel distance to the Project Site.

In addition, under automatic aid agreements, the City Fire Department and Burbank City Fire Department can respond with limited additional units onto the Project Site. For example, the City Fire Department responds one engine company to a first-alarm fire incident, up to two additional Light Force units to a greater alarm fire incident, and a paramedic squad to a medical emergency at the Project Site. The City of Burbank responds with two engine companies, one truck/quint company, and one battalion chief to a structure fire incident, and one Hazardous Materials Task Force to a hazardous materials incident at the Project Site.

c. Response Distance and Access

Response distance relates directly to the linear travel distance (i.e., miles between a station and a site) and the City Fire Department's and the County Fire Department's ability to successfully navigate the given access ways and associated circulation system. Roadway congestion and intersection level of service along the response route can affect the response distance when viewed in terms of travel time. As such, City Fire Department and County Fire Department response times to calls from areas surrounding the Project Site may also vary as a result of the response distance and traffic conditions at the intersections involved.

[332] *Ibid.*

Table 145
Existing County Fire Protection Services

Station No. and Address	Equipment	Personnel	Travel Distance
Fire Station 51 3900 Lankershim Blvd. Universal City, CA 91608	• Single Engine • Single Paramedic Squad	• 1 Captain • 1 Firefighter Specialist • 1 Firefighter • 2 Firefighter Paramedics	Within Project Site
Fire Station 8 7643 W. Santa Monica Blvd. West Hollywood, CA 90046	• Single Engine • Single Light Force • Single Paramedic Squad	• 2 Captains • 3 Firefighter Specialists • 3 Firefighter Paramedics • 5 Firefighters	4.2 Miles
Fire Station 7 864 N. San Vicente Blvd West Hollywood, CA 90069	• Paramedic Engine • Paramedic Squad	• 1 Captain • 1 Firefighter Specialist • 4 Firefighter Paramedics • 1 Battalion Chief	5.8 Miles

Source: Matrix Environmental, 2009.

As discussed in Section IV.B.1, Traffic/Circulation, access to the Project Site is currently provided via several external locations and is directly related to the on-site destination (i.e., employees vs. visitors). Public roadways and access points provide internal and external approaches to the property from Fire Station 51 and other County Fire Department and City Fire Department response units outside of the Project Site. Once on-site, emergency vehicles responding from outside areas in conjunction with the on-site County Fire Department are able to access the entire property via the Project Site's existing internal circulation system.

The City of Los Angeles Fire Code specifies the maximum response distances recommended between specific sites and the nearest fire station, based on land use and fire flow requirements. Pursuant to Section 57.09.07A of the Los Angeles Municipal Code, the maximum response distance between high density residential (i.e., buildings four to six stories in height or greater)[333] and commercial neighborhood land uses and a City Fire Department fire station that houses an engine or truck company is 1.5 miles. The

[333] *Written correspondence from Millage Peaks, Fire Chief, City of Los Angeles Fire Department, dated July 9, 2010.*

maximum response distance between a commercial land use and a fire station that houses an engine company is 1.0 mile, and between a commercial land use and a fire station that houses a truck company is 1.5 miles. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). As discussed above, City Fire Department Fire Station 76 is equipped with an engine company and is located 0.3 miles from the Project Site which meets the City Fire Department criteria.

The County Fire Department uses national guidelines of a five-minute response time as their performance standard for the first-due unit in urban areas such as the Project Site. Thus, units from Fire Station 51 are the first-due units 99% of the time, and provide an average response time of three minutes, which exceeds the County Fire Department's response goals.[334]

As discussed in Section IV.B, Traffic/Circulation, of this Draft EIR, 27 of the 164 study intersections in the Project area currently operate at a level of service E or F during the A.M. and P.M. peak hours.

d. Fire Flow

In general, the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, general and specific access, and degree of fire hazard (based on such factors as building age or type of construction). Fire flow is normally measured in gallons per minute, as well as the duration of the fire flow. Fire flow requirements can range from 2,000 gallons per minute in low-density residential areas to 12,000 gallons per minute in high density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch is required to remain in the water system while the required gallons per minute is flowing, in order to be considered adequate by both the City and County Fire Code standards.

Water utilized as part of the Project Site's fire prevention system is available from two different Los Angeles Department of Water and Power pressure zones (please refer to Section IV.L.2, Water, for a more detailed discussion), each capable of delivering water to a certain elevation. These two zones are referred to as the 830 System and the

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[334] *Written correspondence from Debra Aguirre, Los Angeles County Fire Department, received January 8, 2008.*

1116 System. The Los Angeles Department of Water and Power maintains water lines along Lankershim Boulevard for both the 830 System and the 1116 System. The pressure zone number refers to the hydraulic grade line elevations established by the Los Angeles Department of Water and Power for its water systems. Hydraulic grade lines are the elevations above mean sea level maintained for the pressure zone. For example, the 1116 System refers to a pressure zone with a hydraulic grade line which is 1116 feet above mean sea level. The water main trending northwest to southeast and intersecting the south side of the Project Site is connected to the 1116 System on Lankershim Boulevard. The 1116 system also includes a water line that runs along Barham Boulevard and provides service to the Project Site. Fire demand consumption and flows are infrequent and usage is not monitored; however, the existing fire flow conveyance system can deliver a minimum of 5,000 gallons per minute for an unlimited duration of time to the Project Site.

3. Environmental Impacts

a. Methodology

The following analysis considers three components: demand for services; emergency access; and fire flow infrastructure. The analysis of demand for services discusses the potential increase in incidents based on the level of occupancy at the Project Site. The analysis of emergency access discusses roadway congestion and its implications for emergency access. The discussion of fire flow infrastructure identifies water supply availability and infrastructure improvements for providing adequate fire protection services to the Project Site.

b. Thresholds of Significance

The *City of Los Angeles CEQA Thresholds Guide (2006, p. K.2-3)* states that a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

This threshold is applicable to the proposed Project and as such is used to determine if the Project would have significant impacts with regard to the delivery of fire protection services.

In addition, for purposes of this analysis, the Project would result in a significant impact upon City Fire Department and County Fire Department fire prevention and suppression services if any of the following would result:

- The amount of development proposed within each of the respective jurisdictions (i.e., City and County of Los Angeles) would exceed the staff and equipment capabilities of the City Fire Department and County Fire Department stations currently serving the property;

- Proposed on-site development would not comply with all applicable City Fire Department and County Fire Department code and ordinance requirements for construction, access, water mains, fire flow, and fire hydrants; or

- The Project would inhibit emergency response by increasing roadway congestion within an area (i.e., the proposed Project does not fully mitigate its traffic impacts at adjoining intersections) either during Project construction or post-construction occupancy.

c. Project Design Features

Project-related design features, referred to as Project Design Features hereafter, would be implemented in order to address fire safety and fire suppression issues.

Based on consultations with the City Fire Department, the following Project Design Features would be incorporated into new Project development occurring within the City portion of the Project Site:

- For development in the City portions of the Project Site, the Applicant would comply with the requirements of the Los Angeles Fire Code for fire protection.

- The Applicant would submit a plot plan for approval of access and hydrants by the City Fire Department prior to the issuance of a building permit by the City. The plot plan would include fire prevention and access features to the satisfaction of the City Fire Department which may include:

    - Access for Fire Department apparatus and personnel to and into all structures shall be required.
    - No proposed development utilizing cluster, group, or condominium design of one or two family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.
    - Building designs for multi-residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street or fire lane.
    - Entrance to the main lobby shall be located off the address side of the building.

  - Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
  - No framing shall be allowed until a roadway is installed to the satisfaction of the Fire Department.
  - Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
  - All water systems and roadways are to be improved to the satisfaction of the Fire Department prior to the issuance of any building permits.
  - All structures should be fully sprinklered.
  - 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.
  - The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
  - 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.

- All new buildings in the City would be within 300 feet of an approved fire hydrant. When a fire lane must accommodate the operation of City Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions would not be less than 28 feet in width. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky. Fire lanes, where required, 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.

- New buildings in the City would include any additional communication repeaters, bidirectional amplifiers and/or antennas as required by the City Fire Department.

- During demolition in the City, the City Fire Department access would remain clear and unobstructed.

Based on consultation with the Los Angeles County Fire Department the following Project Design Features would be incorporated into new Project development occurring within the County of Los Angeles portion of the Project Site:

- In conjunction with the building permit process in the County, the Applicant would consult with the County Fire Department and incorporate fire prevention and suppression features appropriate to the design of the Project.

- Project development in the County would comply with all applicable State and County code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants, which may include:

- Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the first story exterior of the building. All required on-site fire access roadways shall provide a minimum unobstructed width of 26 feet, clear-to-the-sky. The fire access roadways shall not allow for parking and shall be designated as a "Fire Lane" with appropriate signage;

- All on-site fire access roadways for structures with a height greater than 35 feet from the vehicular access shall increase to a minimum 28-feet in width for aerial apparatus, clear-to-the-sky. The centerline of the on-site fire access roadways shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure;

- The on-site fire access roadways widths shall be increased to:

  a. Provide 36 feet in width when parallel parking is allowed on both sides of the roadway.

  b. Provide 44 feet in width when aerial apparatus is required and parallel parking is allowed on both sides of the roadway

  c. Any on-site driveway less than 36 feet in width shall be labeled as "Fire Lane" on the final recording map and final building plans;

- Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all fire access roadways exceeding 150 feet in length and at the end of all cul-de-sacs;

- When serving land zoned for residential uses having a density of more than four units per net acre:

  a. A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length.

  b. The length of the cul-de-sac may be increased to 1000 feet if a minimum of 36 feet in width is provided.

  c. The maximum cul-de-sac length is 1000 feet in order to provide efficient circulation of traffic, the future development of the neighborhood street system, and the deployment of emergency services.

d. A Fire Department approved turning area shall be provided at the end of a cul-de-sac;

- All restricted access devices and gates shall comply with the Los Angeles County Fire Department Regulation 5. Plans for any proposed access devices and gates shall be submitted to the Fire Department for review and approval prior to installation;

- Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

  a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

  b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced fire hydrant.

  c. When cul-de-sac depth exceeds 200 feet, hydrants will be required at the corner and mid-block.

  d. Additional hydrants will be required if the hydrant spacing exceeds specified distances.

- The Project would continue to provide fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration in the County. Final fire flows will be based on the size of the buildings, their relationship to other structures, property lines, fire sprinkler systems, and types of construction used.

- Future buildings in the County would be designed with sprinklers in accordance with the County of Los Angeles Building and Fire Codes. An automatic fire sprinkler system would be provided for all buildings with four stories or greater above Los Angeles County Fire Department vehicular access (e.g. street level).

- All new permanent outdoor facades that fall within the scope of the current edition of County Fire Department Regulation #29 would be constructed and maintained in accordance with that Regulation.

- A drafting reservoir and drafting appliances would be provided and maintained with the ability to draft 1.5 million gallons of water designed to the satisfaction of the Los Angeles County Fire Department.

In addition, to facilitate emergency access between the Entertainment and Mixed-Use Residential Areas a new secured fire access road would be provided. This proposed fire access road would be 28 feet in width and travel from a location just east of the Entertainment Area and connect to the proposed North-South Road at approximately the midway point along its length. This proposed fire access road would provide a direct

response route from the central area of the Project Site (easily accessible to/from Los Angeles County Fire Department Station 51) to the eastern portion of the Project Site, and in so doing bypass the circuitous route that would need to be taken based on the current on-site circulation system.

d. Project Impacts

Under the proposed Project, approximately 139 acres of the Project Site would be located within the City of Los Angeles, and the remaining approximately 252 acres of the Project Site would be located within the boundaries of the County of Los Angeles. Proposed land uses within the City would include all of the residential development (2,937 units), 180,000 square feet of community- and neighborhood-serving commercial uses, as well as 300,000 square feet of studio and studio office uses. Proposed land uses in the County include approximately 1.59 million square feet of net new studio, entertainment, office, and hotel uses. The proposed hotel would include up to 500 hotel rooms and related hotel facilities.

(1) Construction Impacts

Construction of the proposed Project would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. Construction contractors and the work crews would implement the following measures to minimize these hazards during construction of the proposed Project: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur. Please refer to Section IV.M, Environmental Safety, of this Draft EIR for additional information.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

(1) Construction impacts are temporary in nature and do not cause lasting effects;

(2) Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete; and

(3) County Fire Department Fire Station 51, which includes an engine company and a paramedic squad, and is located on-site, would be available throughout the duration of Project construction as well as following the completion of construction.

Based on the above information, Project construction would not be expected to affect fire fighting and emergency services to the extent that there would be a need for any additional new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the City Fire Department and the County Fire Department.

In addition to emergency fire service facilities, the Project's proposed new construction would increase the demand for duties performed by fire inspectors. As a result, the City Fire Department has indicated that a fire inspector is required to serve the requests of Project construction within the City portion of the Project Site, and the County Fire Department has determined that an additional fire inspector position is required to serve the requests of Project construction within the County portion of the Project Site. In order to reduce potential impacts, Mitigation Measures K.1-3 and K.1-4 address the need for added personnel to assist with fire inspection duties. The need for an additional fire inspector position would not result in the need for a new fire station or other facility for either the City or the County. Therefore, construction-related impacts related to fire protection services would be less than significant with mitigation.

(2) Operational Impacts

The increase in potential employees, site visitors, and residents would generate an increase in the demand for fire protection services. The analysis below considers the criteria for determining the proposed Project's impacts to fire protection services, including fire flows, and City Fire Department and County Fire Department criteria with regard to response distance and access.

(a) City of Los Angeles Fire Department

(i) Facilities and Equipment

When considering facilities and equipment, the City Fire Department has indicated that the adequacy of fire protection for a given area is based on the City Fire Department's judgment for needs in that area. Implementation of the proposed Project, including the generation of new residents and employees, would create an increased demand on City Fire Department fire services and facilities. In addition, events associated with the proposed Project and the Project Site as a whole would generate high levels of occupancy and traffic on an intermittent basis.

Under the proposed Project, it is anticipated that the City portions of the Project Site would be served mainly by Fire Station 76, which is located on Cahuenga Boulevard approximately 0.3 miles away from the Project Site. As noted in correspondence received from the City Fire Department, Fire Station 76 is supplied with a single engine company and a paramedic rescue ambulance with an accompanying six (6) personnel; and as a result of the age and size of the station, can only house those two vehicles within its existing physical arrangement.

The City Fire Department has also stated that the inclusion of multiple high-rise structures and multiple high density residential units (i.e., four to six stories in height or greater) would require the expansion of existing fire fighting capabilities to serve the Project Site. Due to the potential for multiple high-rise and multiple high density residential buildings (i.e., four to six stories in height or greater) within the proposed Project on City lands, the City Fire Department has indicated that a City Fire Department truck company within one (1) mile of the Project Site and a City Fire Department engine company, and rescue ambulance within ¾ mile of the Project Site are required. In light of these anticipated additional equipment and staffing needs, the City Fire Department has concluded that Fire Station 76, which includes a single engine company and a paramedic rescue ambulance, cannot physically house another response vehicle. Accordingly, construction of a new fire station would be required in order to service the proposed Project and to maintain service for adjoining uses.

As such, Mitigation Measure K.1-2 below is provided to ensure that the demands for fire services generated by the proposed Project are satisfactorily met. With implementation of Mitigation Measure K.1-2, all potentially significant impacts related to City Fire Department facilities and equipment would be reduced to acceptable levels.

(ii) Response Distance and Access

As previously discussed, the proposed Project would be serviced by an existing and operational Fire Station (Fire Station 76) within 0.3 miles of the Project Site. Access to the Project Site is currently provided via several external locations and is directly related to the on-site destination (i.e., employees vs. visitors). Once on-site, emergency vehicles responding from outside areas are able to access the entire property via an internal circulation system.

Based on the Project's proposed Circulation Plan, it is likely that Fire Station 76 would be able to respond to on-site areas within the established response time.[334] However, depending on the type, size, and location of land uses constructed within the Project Site and overall access within the Project Site as the Project is developed, the City Fire Department has stated the need for a new City Fire Department truck company within 1 mile of the Project Site due to the inclusion of multiple high-rise and multiple high density residential buildings (i.e., four to six stories in height or greater) as part of the proposed Project. The response distance from the new station to the various portions of the Project Site (north, south, east, and western portions of the Project Site) could be reduced substantially depending on its location.

To help alleviate access issues within the Project Site, a new fire access road would connect the Entertainment Area to the proposed North-South Road. This proposed fire access road would be 28 feet in width and travel from a location just east of the Entertainment Area and connect to the North-South Road midway along its length. This proposed fire access road would provide a direct response route from the central area of the Project Site (easily accessible to/from County Fire Department Station 51) to the eastern portion of the Project Site, and in so doing bypass the circuitous route that would need to be taken based on the current on-site circulation system. The proposed fire access road, coupled with a new City Fire Department truck company within 1 mile of the Project Site, would help increase overall response times to the City portions of the Project Site. In addition, new fire stations include signal pre-emption controls that would also help reduce potential impacts to emergency access during heavily congested travel periods in and around the Project Site.

With regard to non first-due fire stations, response times for these City Fire Department Fire Stations would increase, since these units are responding to an area approximately 1.9 to 3.5 miles away in distance with potential increased traffic congestion in the future between these stations and the Project Site. In particular, Fire Station 86, which is approximately 1.9 miles away in distance, would be the next due station to respond to emergency calls. Although Fire Station 86 is within the appropriate response distance, the response time from the station to the Project Site is projected to be slowed in the future due to the forecasted growth and congestion expected to occur in the area surrounding the Project Site. Similarly, Fire Stations 82, 27, and 60 are expected to experience similar conditions caused by forecasted growth and indirect traffic congestion in the North Hollywood area by the time the Project is fully implemented. Although response

[334] *Ibid.*

times may increase for these stations, fire trucks would still be able to navigate congested traffic conditions through a number of standard operating procedures. Furthermore, under the automatic aid agreements currently in place, County Fire Department and Burbank Fire Department can respond with additional units to the Project Site, as needed.

As such, with implementation of the identified mitigation measure, potential impacts related to City Fire Department response distance and emergency access under the proposed Project would be reduced to a less than significant level.

(iii) Fire Flow

As determined by the City Fire Department, the overall fire flow requirement for the proposed Mixed-Use Residential Area would be 12,000 gallons per minute flowing simultaneously through a minimum of 8 fire hydrants. With regard to typical fire flow requirements, 4,000 gallons per minute flowing simultaneously from four adjacent hydrants is generally required for high density residential (four to six stories in height or greater) and commercial uses. Due to the amount and anticipated types of development (i.e., multiple high-rise structures and multiple high density residential units of four to six stories in height or greater) a higher fire flow capacity than 4,000 gallons per minute is recommended by the City Fire Department. The required fire flow may be reduced by the City Fire Department once the size, type of use, type of construction, and exact location of individual buildings within the City portion of the Project Site are determined.

As stated above, water utilized as part of the Project Site's fire prevention system is available from two different Los Angeles Department of Water and Power pressure zones, each capable of delivering water to a certain elevation. While fire flows are infrequent and usage is not monitored, the existing fire flow conveyance system can deliver a minimum of 5,000 gallons per minute for an unlimited duration to the Project Site.

As part of the development of the Mixed-Use Residential Area the Applicant or its successor would install a new fire water delivery system on-site that would provide the required fire flow. Mitigation Measure K.1-1 below is provided to require that the Project comply with the City Fire Department requirement of 12,000 gallons per minute capacity for fire flows. Any additional water lines and hydrants that may be required to serve the new buildings and/or to provide the required fire flows would be constructed as necessary. Any water main and other infrastructure upgrades potentially required for the fire flow system would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; and (2) the replacement of the water mains would be within public rights-of-way and would be installed in accordance with all statutory and City Fire Department required improvements which would preclude significant impacts. In addition, hydrants and water lines would also be installed per City

Fire Code requirements for the proposed Project. As such, with implementation of Mitigation Measure K.1-1 with respect to fire flows, fire protection services would be adequate with respect to City Fire Department and the associated impact would be less than significant.

(b) County of Los Angeles Fire Department

(i) Facilities and Equipment

The County Fire Department has indicated that the need for fire service and additional equipment is based upon the nature of the use proposed rather than strictly the amount of development proposed. For example, the County Fire Department assesses the need for additional manpower and equipment based on the height of the building and/or the level of occupancy for a specific use. Building height is a factor in that buildings over 75 feet in height require specialized firefighting equipment that is not required to service buildings lower than 75 feet in height (height shall be measured as the distance from grade to the top of the structure, except for chimneys and rooftop antennas).[335] Occupancy levels are typically categorized into "high-occupancy" uses (offices and hotel) and "non high-occupancy" uses (studios, entertainment, retail, and residential). It is important to delineate the difference between the two types of uses, since high-occupancy uses tend to yield a higher population per square-foot than non high-occupancy uses. According to the County Fire Department, the development of high-occupancy uses would trigger the need for: (1) an additional new fire station or the remodeling of the existing County Fire Station 51 to accommodate additional equipment and staffing (hereafter known as "Facility Improvements"), (2) additional equipment, and (3) additional manpower. The County Fire Department has indicated that the decision to remodel the existing County Fire Department Station 51 or construct a second additional station is solely the County Fire Department's based upon its determination of service needs. If the County Fire Department were to determine that a new fire station is required, it would be a small station built to the County Fire Department's specification to accommodate a new quint with a minimum of four (4) fire fighter positions. A quint is a dual purpose fire apparatus vehicle, acting as both an engine and ladder truck. According to the National Fire Protection Association, a quint is defined as a "fire apparatus with a permanently mounted fire pump, a water tank, a hose storage area, and aerial ladder or elevating platform with a complement of ground ladders." While the decision to remodel or construct a new fire station is at the discretion of the County Fire Department, in general, a new station or a remodel to the existing station would be required

[335] *Los Angeles County Code, Chapter 22.08 and 22.28, January 31, 2008.*

under the following conditions: (1) a high-occupancy use is developed as part of the Project that results in a building that is greater than 70,000 square feet in total floor area where no high occupancy building greater than 70,000 square feet previously existed; (2) development of any new structure that is greater than 75 feet in height where no building greater than 75 feet in height previously existed; or (3) the cumulative floor area for multiple high-occupancy buildings in the same vicinity of less than 75 feet in height exceeds 100,000 square feet.

For example, if an existing 100,000 square foot office building (high-occupancy use) is demolished and replaced with a similar sized new office building, no requirements for additional fire services would be warranted since the new office building would be of similar size and would also be a high-occupancy use. However, if a 30,000 square foot office building is demolished and replaced or remodeled with an 80,000 square foot office building, the requirements for additional fire services would be warranted. This is due to the fact that the overall square footage of high-occupancy uses would exceed 70,000 square feet and, thus, trigger the County Fire Department thresholds for Facility Improvements.

According to the County Fire Department, in addition to the existing units from Fire Station 51, the proposed Project would require a quint staffed with a minimum of four (4) firefighter positions.[336] As discussed above, the County Fire Department would determine which Facility Improvements are needed and could consist of either: (1) remodeling of the existing station by the Applicant to accommodate the quint and its staffing, or (2) the construction of a second additional station. If the County Fire Department deems the additional station to be necessary, the Applicant or its successor and the County Fire Department would work together to appropriately locate the station on the Project Site. Mitigation Measure K.1-5 below is provided to require the Applicant or its successor to construct and furnish the Facility Improvements, as well as to provide the quint and ancillary equipment for the quint. The County Fire Department would be responsible for staffing costs. In addition, Mitigation Measure K.1-6 below is provided to require an annual review of the Facility Improvement needs of the Project Site as the Project is built.

(ii) Response Distance and Access

As previously discussed, the proposed Project would be serviced by an existing and operational County Fire Station on-site, as well as a potential new, second fire station

[336] *Written correspondence from John R. Todd, Los Angeles County Fire Department, March 8, 2010.*

within the Project Site. At the County Fire Department's discretion, in lieu of the second additional station, the Applicant may remodel the existing fire station to accommodate the additional equipment and staffing. Access to the Project Site is currently provided via several external locations and is directly related to the on-site destination (i.e., employees vs. visitors). Once on-site, emergency vehicles responding from outside areas in conjunction with the on-site County Fire Department are able to access the entire property via an internal circulation system.

According to the County Fire Department, response distances for engine and paramedic squad services would be acceptable with development of the proposed Project, given that the majority of the eastern portion of the Project Site (proposed Mixed-Use Residential Area) would be annexed to the City of Los Angeles and would therefore be under the jurisdiction of the City Fire Department.[337] Currently, the County Fire Department uses the national guideline of a five-minute response time as their performance standard for the first-due unit in urban areas such as the Project Site.

Based on the Project's proposed Circulation Plan, it is likely that Fire Station 51 and/or the potential new fire station, would be able to respond to on-site areas within the established response time of five minutes. In addition, as discussed above under City impacts, a fire access road is proposed that would travel from a location just east of the Entertainment Area and connect to the North-South Road midway along its length. The proposed fire access road would allow the County Fire Department to assist the City Fire Department on an as-needed basis. If the County Fire Department determines that a new, second fire station is required, the Applicant and the County Fire Department would work together to place the new, second fire station in a location that ensures acceptable response times of five minutes or less. In addition, Mitigation Measure K.1-6 below establishes an annual process to discuss upcoming developments and the Facility Improvement needs.

With regard to off-site fire stations, response times for County Fire Department Fire Stations 8 and 7 may increase in the future, since these units are responding to an area approximately five (5) miles away in distance with likely increased traffic congestion in the future between these stations and the Project Site. Although response times may increase for these stations, they are not considered first-due stations and are not required to respond within the County's five-minute response goal. Furthermore, under the automatic

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[337] *Written correspondence from Debra Aguirre, Los Angeles County Fire Department, received January 8, 2008.*

aid agreements currently in place, the City Fire Department and Burbank Fire Department can respond with additional units to the Project Site, as needed.

As such, with implementation of the identified mitigation measures, potential impacts related to County Fire Department response distance and emergency access under the proposed Project would be reduced to a less than significant level.

(iii) Fire Flow

As determined by the County Fire Department, the overall fire flow requirement for the proposed County portions of the Project is 5,000 gallons per minute total with a 20 pounds per square inch minimum residual pressure for five hours.[338] According to correspondence received from the County Fire Department, this is the maximum fire flow required by the County Fire Department. As previously noted, the existing fire flow conveyance system in and around the Project Site can deliver a minimum of 5,000 gallons per minute for an unlimited duration of time and no improvements to the existing water system serving the proposed Project would be required to provide the required fire flow.[339] The required fire flow may be reduced by the County Fire Department once the size, type of use, type of construction, and exact location of individual buildings within the Project Site are determined, although high-rise buildings or other high-occupancy structures that total 70,000 square feet or greater may not have the required fire flow reduced below 3,500 gallons per minute at 20 pounds per square inch minimum residual pressure for three hours.[340]

The Project would comply with all applicable County Fire Department requirements regarding fire flows, and any additional water lines and hydrants that may be required to serve new buildings would be constructed as necessary. Furthermore, any water main and other infrastructure upgrades potentially required would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; and (2) the replacement of the water mains would be within public rights-of-way and would be installed in accordance with all statutory and County Fire Department required improvements which would preclude significant impacts. In addition, hydrants and water lines would also be installed per County Fire Code requirements for the proposed Project. Furthermore, the County Fire Department would require the Applicant or

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[338] *Ibid.*

[339] *Ibid.*

[340] *Ibid.*

its successor to contact the local water purveyor, if the fire hydrant is public, or a private sprinkler contractor, if the fire hydrant is private, to have the closest existing fire hydrant(s) verified and tested by conducting fire flow availability test(s). Mitigation Measure K.1-7 below would address the need for testing and verification of existing hydrant and fire flow availability. As such, with respect to fire flows, fire protection services would be adequate with respect to the County Fire Department and the associated impact would be less than significant with mitigation.

(3) Impacts under No Annexation Scenario

Under the No Annexation scenario, approximately 95 acres (24 percent of the total area of the Project Site) would remain located within the City of Los Angeles, and 296 acres (76 percent) would remain in the County of Los Angeles. The Project's proposed development program under the No Annexation scenario would differ from that analyzed above in that the City Fire Department would service relatively larger portions of the Entertainment and Business Areas, while the County Fire Department would service a large portion of the proposed residential development within the Mixed-Use Residential Area. [341]

(a) Construction Impacts

For the purpose of analysis, it is anticipated that while City and County boundaries would be different under the No Annexation scenario from those proposed under the Project, the overall quantity of new construction (i.e., total square footage) proposed under the two proposed Specific Plans would be the same. As such, it is anticipated that the same amount and type of construction would occur and, subsequently, that similar short-term impacts to those identified for the proposed Project would result. Such impacts, as is the case with the proposed Project, would be less than significant, since the Project in either case would comply with existing City Fire Department and County Fire Department requirements, emergency response times would not be significantly impacted by the Project's construction, and emergency vehicle access to adjoining and nearby properties would be maintained at all times.

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[341] *Under existing jurisdictional boundaries the area designated in the proposed City Specific Plan as Planning Subarea 10 is located partly in the City of Los Angeles and partly in unincorporated County of Los Angeles. For purposes of the "No Annexation" analysis it was assumed that the 250,000 square feet of studio office proposed in Planning Subarea 10 would not be split between the two jurisdictions and was assumed for the analysis to be within the City. In the event that the proposed annexation does not occur as proposed and Planning Subarea 10 is instead within the unincorporated County portion of the Project Site, the additional development that would occur in the County would not result in impacts greater than those identified in this analysis.*

(b) Operational Impacts

As mentioned above, the increase in employees, site visitors, and residents with the Project would generate a potential increase in the demand for fire protection services. The discussion below considers the criteria for determining the proposed Project's impacts to fire protection services, including fire flows, response distance, and City Fire Department and County Fire Department review of hydrants and access in the event that the proposed annexation does not occur.

(i) City of Los Angeles Fire Department

Facilities and Equipment

Under the No Annexation scenario, it is anticipated that the existing City portions of the Project Site would still be served mainly by City Fire Station 76 and that the existing County of Los Angeles portions of the Project Site would be served by the County Fire Department. Implementation of the Project under the No Annexation scenario, including the generation of new residents and employees, would create an increased demand on City Fire Department services and facilities.

Specifically, impacts would be identical to those listed under the proposed Project analyses, as the City Fire Department bases its equipment and facility service needs on the height and type of new construction, which would be the same under both the proposed Project and the No Annexation scenario, as only the allocation of land uses changes under the No Annexation scenario. As such, even though the proposed residential land uses that would be under the jurisdiction of the City Fire Department would be substantially reduced under the No Annexation scenario (from 2,937 units to 1,178 units) (four to six stories in height or greater), the need for fire equipment to service high-rise and high density residential structures on City land would still be warranted. Although the City Fire Department has been able to adequately provide fire service to the Project Site in the past, the No Annexation scenario would present a potentially significant impact on its service capability, as is also the case with the proposed Project. Thus, similar to the proposed Project, a new City Fire Department truck company within 1 mile of the Project Site would be required based on the size of and manpower of existing facilities compared to what would be required to service the Project under the No Annexation scenario.

According to the City Fire Department, the structure housing Fire Station 76 is insufficient in size to accommodate additional manpower and equipment. Similar to the impact discussion under the proposed Project, the construction of a new fire station would be required. As such, similar to the analysis under the proposed Project, Mitigation Measure K.1-2 below is provided to ensure that the demands for fire services of the Project

under the No Annexation scenario are satisfactorily met. As with the proposed Project, implementation of Mitigation Measure K.1-2 would reduce all potentially significant impacts related to City Fire Department facilities and equipment under the No Annexation scenario to acceptable levels.

Response Distance and Access

According to the City Fire Department, under the No Annexation scenario, response distances for engine and paramedic squad services would be acceptable. Similar to the impacts under the proposed Project, the proposed Circulation Plan indicates that Fire Station 76 would be able to respond to on-site areas within the established response time of five minutes. Depending on the type, size, and location of land uses constructed within the Project Site under the No Annexation scenario and overall access within the Project Site as the Project is developed, the City Fire Department has indicated the potential need for a new City Fire Department truck company within 1 mile of the Project Site due to the potential development of multiple high-rise and multiple high density residential buildings (four to six stories in height or greater). Thus, the response distance from the new station to the various portions of the Project Site (north, south, east, and western portions of the Project Site) would be at acceptable levels according to the City Fire Department. Also, to help alleviate access problems around the Project Site, a new service road is proposed to the east of the Entertainment Area linking the central portion of the Project Site to the proposed residential uses along the eastern portion of the Project Site.

Similar to the impacts under the proposed Project, response times for City of Los Angeles Fire Department Stations 86, 27, and 60 may increase under the No Annexation scenario, since these units are responding to an area approximately two miles away in distance with likely increased traffic congestion in the future between these stations and the Project Site. Although response times may increase for these stations, they are not considered first-due stations and are not required to respond within the City's response goal. They will assist with emergency calls on an as-needed basis. Similar to the proposed Project, signal pre-emption controls would be included in new fire stations. Furthermore, under the automatic aid agreements currently in place, the County Fire Department and Burbank Fire Department can respond with additional units to the Project Site, as needed.

As such, with implementation of the identified Mitigation Measure below, potential impacts related to City Fire Department response distance and emergency access under the No Annexation scenario would be reduced to an acceptable level.

Fire Flow

Similar to the proposed Project, the overall fire flow requirement under the No Annexation scenario would be 12,000 gallons per minute flowing simultaneously through a minimum of 8 fire hydrants. Although a large part of the eastern portion of the Project Site (proposed Mixed-Use Residential Area) would not be annexed to the City of Los Angeles under the No Annexation scenario, it would not alleviate the need for proper fire flow availability and hydrant access in and surrounding the Project Site. Similar to the proposed Project, water would be available from Los Angeles Department of Water and Power water lines to help service the needs of the Project Site with the appropriate fire flows, as required. The required fire flow may be reduced by the City Fire Department once the size, type of use, type of construction, and exact location of individual buildings within the City portion of the Project Site are determined.

While fire flows are infrequent and usage is not monitored, the existing fire flow conveyance system can deliver a minimum of 5,000 gallons per minute for an unlimited duration to the Project Site. As part of the development of the Mixed-Use Residential Area the Applicant or its successor would install a new fire water delivery system on-site that would provide the required fire flow. Mitigation Measure K.1-1 below is provided to require that the Project comply with the City Fire Department requirement for 12,000 gallons per minute for fire flow. Thus, the Project under the No Annexation scenario would comply with all applicable City Fire Department requirements regarding fire flows, and any additional water lines and hydrants that may be required to serve new buildings and/or to provide the required fire flow would be constructed as necessary. Further, any water main and other infrastructure upgrades potentially required would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature; and (2) the replacement of the water mains would be within public rights-of-way and would be installed in accordance with all statutory and City Fire Department required improvements which would preclude significant impacts. In addition, hydrants and water lines would also be installed per Fire Code requirements for the Project. As such, with implementation of Mitigation Measure K.1-1 with respect to fire flows, fire protection services would be adequate and the associated impact would be less than significant with respect to the City Fire Department under the No Annexation scenario.

(ii) County of Los Angeles Fire Department

Facilities and Equipment

Under the No Annexation scenario, approximately 1.05 million square feet of net new commercial development and 1,759 residential units would be located within the County of Los Angeles. Under the No Annexation scenario, it is anticipated that the

existing County portions of the Project Site would still be served mainly by County Fire Station 51, and that the existing City of Los Angeles portions of the Project Site would be served by the City Fire Department. As previously discussed, the County Fire Department has indicated that the need for fire service and additional equipment is based upon the nature and size of the land use proposed, as well as on the County Fire Department's determination of service needs.

The increase in additional land and proposed residential land uses could increase the demand for additional manpower and fire services. Specifically, under the No Annexation scenario, development of the proposed Project would require an additional five (5) personnel at Fire Station 51, which is one more staff position than what is required under the proposed Project.[342] This is mainly due to the proposed increase in overall land area that would be served and the need to service residential units, which would not be the case under the proposed Project. As noted above, Fire Station 51 currently has five (5) personnel (3 engine + 2 paramedic squad) positions filled, and would be required to accommodate an additional position for the engine and four (4) new positions for the quint. According to the County Fire Department, the new truck that would potentially be acquired under the No Annexation scenario is a quint, which is the same as for the proposed Project. As such, similar to the proposed Project, Facility Improvements would be required to accommodate additional equipment and manpower required under the No Annexation scenario. Similar to the proposed Project, Facility Improvements could include either the remodel and expansion of the existing Fire Station 51 to house additional fire equipment or the construction of a new, second fire station within the vicinity of the Project Site. As noted previously, Mitigation Measure K.1-5 below is provided to require the Applicant to construct and furnish the Facility Improvements, as well as to provide the quint and ancillary equipment for the quint. The Los Angeles County Fire Department would be responsible for staffing costs.

In addition, similar to the proposed Project, the County Fire Department would require that the Applicant and the County Fire Department meet annually to review the new construction that is anticipated for the upcoming year and assess Facility Improvement needs. Mitigation Measure K.1-6 below establishes this annual process.

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[342] *Written correspondence from John R. Todd, Los Angeles County Fire Department, March 8, 2010.*

Response Distance and Access

According to the County Fire Department, under the No Annexation scenario, response distances for engine and paramedic squad services would not be acceptable, given that the eastern portion of the Project Site (portions of the proposed Mixed-Use Residential Area) would not be annexed to the City of Los Angeles.[343] If the County Fire Department were to remain responsible for the eastern portion of the Project Site, response distances and times would increase substantially. As discussed above, a new emergency access fire road is proposed that would be 28 feet in width and travel from a location just east of the Entertainment Area and connect to the North-South Road midway along its length. This proposed emergency access fire road would provide a direct route response from a potential new fire facility or from Fire Station 51 to the proposed residential portion of the proposed Project, thus bypassing the longer route that would need to be taken based on the current and proposed on-site circulation system. A direct route from Fire Station 51 is necessary, with or without the new station, since the paramedic squad would be responding from Fire Station 51 into the new residential development with either the engine from Station 51 or the quint from the potential second station.

Similar to the impacts under the proposed Project, response times for County Fire Department Stations 8 and 7 may increase under the No Annexation scenario, since these units are responding to an area approximately five (5) miles away in distance with likely increased traffic congestion in the future between these stations and the Project Site. Although response times may increase for these stations, they are not considered first-due stations and are not required to respond within the County's five-minute response goal. They would assist with emergency calls on an as-needed basis. Furthermore, under the automatic aid agreements currently in place, the City Fire Department and Burbank Fire Department can respond with limited additional units to the Project Site, as needed.

As such, with implementation of the identified Mitigation Measures below, potential impacts related to County Fire Department response distance and emergency access under the No Annexation scenario would be reduced to a less than significant level.

[343] *Written correspondence from Debra Aguirre, Los Angeles County Fire Department, received January 8, 2008.*

Fire Flow

Similar to the proposed Project, the overall fire flow requirement in the County under the No Annexation scenario would be 5,000 gallons per minute with a 20 pounds per square inch minimum residual pressure for five hours, regardless of changes in land area under the No Annexation scenario.[344] According to correspondence received from the County Fire Department, this is the maximum fire flow required by the County Fire Department. As noted above, the existing fire flow conveyance system in and around the Project Site can deliver a minimum of 5,000 gallons per minute for an unlimited duration of time and no improvements to the existing water system serving the proposed Project are required.[345] However, the required fire flow may be reduced by the County Fire Department once the size, type of use, type of construction, and exact location of individual buildings within the Project Site are available. Also, given the proposed increase in overall land area and proposed residential land uses in the County under the No Annexation scenario, if more than one private/on-site fire hydrant is required, the hydrants would require a fire flow of 2,500 gallons per minute at 20 pounds per square inch minimum residual pressure for two hours. Each private/on-site fire hydrant would be required to be capable of supplying a minimum fire flow of 1,250 gallons per minute at 20 pounds per square inch minimum residual pressure for two hours. This is important because, according to the County Fire Department, additional fire hydrants would be required within the proposed residential development under the No Annexation scenario. In addition, the County Fire Department would require the installation of new fire hydrants within 300 feet of one another on all public streets. These fire hydrants and water lines would be installed per County Fire Code requirements.

Similar to the proposed Project, under the No Annexation scenario, the County Fire Department would also require the Applicant or its successor to contact the local water purveyor, if the fire hydrant is public, or a private sprinkler contractor, if the fire hydrant is private, to have the closest existing fire hydrant(s) verified and tested by conducting a fire flow availability test. Mitigation Measure K.1-7 below would require the Applicant or its successor to contact the local water purveyor. As such, with respect to fire flows, fire protection services would be adequate and the associated impact of fire flows would be less than significant with mitigation with respect to the County Fire Department under the No Annexation scenario.

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[344] *Ibid.*

[345] *Ibid.*

4. Cumulative Impacts

In order to assess cumulative impacts to City Fire Department and County Fire Department services, an analysis based on future population and employment projections for the respective department service response areas was performed. For the purpose of the Project's population modeling and analysis, population and employment projections have been broken down into the City Fire Department and County Fire Department service response areas that are used by the individual departments.

a. Cumulative Proposed Project Impacts

(1) City of Los Angeles Fire Department

As noted above, the City of Los Angeles Fire Code specifies the maximum response distances recommended between specific sites and the nearest fire station, based on land use and fire flow requirements, to typically be 1.5 miles. Thus, the cumulative off-site growth analysis presented below is based on a 1.5 mile radius from the individual City Fire Department fire station.

With regards to the City Fire Department, cumulative impacts are anticipated to increase the overall demand for fire protection services. As noted earlier, the City Fire Department has indicated that Fire Station No. 76 (which currently serves the City portions of the Project Site) would not be able to support the demands of the area population in conjunction with the proposed Project. As the population and overall employment opportunities continue to grow in the surrounding area, increased demand would further lessen fire protection service abilities. The cumulative analysis below is based on off-site growth projections within the first-due service areas for Fire Stations 76, 86, 82, 27, and 60. All fire stations are included in the analysis since they would assist Fire Station 76 on an as needed basis.

Based on the cumulative analysis performed for the Project, an additional 47,729 non-Project residents would be added within the City Fire Department first due service areas between 2008 and 2030, the year of Project buildout. Additionally, approximately 25,169 non-Project employees would be added to the City Fire Department first due service areas, resulting in a total non-Project population increase in the first-due service areas of 72,898 persons.

Therefore, a potential impact from the identified growth on City Fire Department fire protection services, exclusive of the proposed Project, would be anticipated, as an expansion of facilities or the construction of a new facility would likely be required to

accommodate the additional staff and equipment needs required to service the expected off-site growth. Nevertheless, it is expected that planned area-wide service improvements by the City Fire Department would be in place to meet additional cumulative off-site growth/changes in land use patterns which may occur between 2008 and 2030. In particular, Project related impacts would not contribute to cumulative off-site effects in the surrounding area since Project related impacts would be fully mitigated by the Project's proposed mitigation measures. Therefore, the Project would not contribute to any cumulative impacts to City Fire Department services.

In addition, developers of individual future projects, as well as the proposed Project, would provide for all statutory and Fire Department-required improvements to facilitate the provision of fire services. Thus, through this process, the ability of the City Fire Department to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be assured. On this basis, it is anticipated that cumulative impacts to City Fire Department services would be less than significant.

(2) Los Angeles County Fire Department

With regards to the County Fire Department, cumulative impacts are not expected to occur since the service area for Fire Station No. 51, located in the central portion of the Project Site, is not contiguous with other County Fire Department service areas, and on-site demand for fire protection services would be fully accounted for by the Project's mitigation measures. As such, the Project's cumulative impacts with regard to Fire Station No. 51 would be less than significant.

b. Cumulative Impacts Under No Annexation Scenario

(1) City of Los Angeles Fire Department

The No Annexation scenario would result in a non-Project population growth of approximately 72,898 persons within the first-due response service areas for each of the respective City Fire Department stations. Similar to the proposed Project, it is expected that planned area-wide service improvements by the City Fire Department would be in place to meet additional cumulative off-site growth/changes in land use patterns, which may occur between 2008 and 2030. Furthermore, Project related impacts would not contribute to cumulative off-site effects in the surrounding area since Project related impacts would be fully mitigated by the proposed mitigation measures, similar to the impacts under the proposed Project. Between 2008 and 2030, the bulk of on-site Project development would have already occurred and all mitigation measures would already be in place to meet projected impacts. Therefore, as is the case with the proposed Project, with

implementation of the recommended mitigation measures, the Project under the No Annexation scenario would have the same less than significant cumulative impact on City fire protection services.

(2) Los Angeles County Fire Department

With regards to the County Fire Department, cumulative impacts are not expected to occur since the service area for Fire Station No. 51 is not contiguous with other County Fire Department service areas, and on-site demand for fire protection services would be fully accounted for by Project's mitigation measures. As such, the No Annexation scenario would have less than significant cumulative impacts on County Fire Department services, as is the case with the proposed Project.

5. Project Design Features and Mitigation Measures

The proposed Project would be required to meet the requirements of all City and County Fire Codes. In addition, the following project design features and mitigation measures are identified to address: (1) proposed development that could potentially require an increase in fire services beyond what currently exists; (2) the potential need for additional fire equipment to service the proposed Project; and (3) the potential need for additional fire hydrants on both public and private land and to ensure fire flow availability.

a. Project Design Features

(1) City of Los Angeles

Project Design Feature K.1-1: For development in the City portions of the Project Site, the Applicant or its successor would comply with the requirements of the Los Angeles Municipal Code for fire protection.

Project Design Feature K.1-2: The Applicant or its successor shall submit a plot plan for approval of access and fire hydrants by the City Fire Department prior to the issuance of a building permit by the City. The plot plan shall include fire prevention, suppression and access features to the satisfaction of the City Fire Department.

Project Design Feature K.1-3: All new buildings in the City shall be within 300 feet of an approved fire hydrant. When a fire lane must accommodate the operation of City Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The width of private roadways for

general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky. Fire lanes, where required, 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.

Project Design Feature K.1-4: New buildings in the City would include any additional communication repeaters, bidirectional amplifiers and/or antennas as required by the City Fire Department

Project Design Feature K.1-5: During demolition in the City, the City Fire Department access shall remain clear and unobstructed.

(2) County of Los Angeles

Project Design Feature K.1-6: In conjunction with the building permit process in the County, the Applicant or its successor shall consult with the Los Angeles County Fire Department and incorporate fire prevention and suppression features appropriate to the design of the Project.

Project Design Feature K.1-7: Project development in the County shall comply with all applicable County code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

Project Design Feature K.1-8: The Project shall continue to provide fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration in the County. Final fire flows will be based on the size of the buildings, their relationship to other structures, property lines, fire sprinkler systems, and types of construction used.

Project Design Feature K.1-9: Future buildings in the County shall be designed with sprinklers in accordance with the County of Los Angeles Building and Fire Codes. An automatic fire sprinkler system shall be provided for all buildings with four stories or greater above Los Angeles County Fire Department vehicular access (e.g. street level).

Project Design Feature K.1-10: All new permanent outdoor facades that fall within the scope of the current edition of Los Angeles County Fire Department Regulation #29 shall be constructed and maintained in accordance with that Regulation.

Project Design Feature K.1-11: A drafting reservoir and drafting appliances shall be provided and maintained with the ability to draft 1.5 million gallons of water designed to the satisfaction of the Los Angeles County Fire Department.

(3) City and County of Los Angeles

Project Design Feature K.1-12: Prior to Project completion, the Applicant or its successor shall construct a 28-foot wide secured fire access road from a location just east of the Entertainment Area and connect to the proposed North-South Roadway midway along its length.

b. Mitigation Measures

(1) City of Los Angeles

Mitigation Measure K.1-1: Fire flow of 12,000 gallons per minute flowing simultaneously through a minimum of 8 fire hydrants shall be provided to the Mixed-Use Residential Area. Fire flow shall be provided as set forth in Mitigation Measure IV.L.2-1. Phased implementation of the fire flow system may be provided subject to the approval of the City Fire Department. Alternative fire flow facilities may be provided subject to the approval of the City Fire Department

Mitigation Measure K.1-2: Prior to the issuance of the first building permit for a building 75 feet tall or greater within the Mixed-Use Residential Area or the issuance of the first building permit for more than 100 units of high density residential (i.e., buildings four to six stories in height or greater), there shall be (a) a City Fire Department Engine Company within ¾ of a mile and a City Fire Department Truck company within 1 mile of the Mixed-Use Residential Area and facilities to house such Companies, to the satisfaction of the City Fire Department, or (b) alternative facilities acceptable to the City Fire Department that would provide adequate manpower, equipment and facilities to provide fire services to the Mixed-Use Residential Area within the response time established by the City

Mitigation Measure K.1-3: Upon the issuance of the first building permit for new Project construction in the City portion of the Project Site, the Applicant or its successor shall enter into an agreement with the City to reimburse the City for the cost of a City Fire Department Inspector II (to include travel time, inspection and research time) who will be assigned to the City portion of the Project during its construction.

(2) County of Los Angeles

Mitigation Measure K.1-4: Upon the issuance of the first building permit for new Project construction in the County portion of the Project Site, the Applicant or its successor shall enter into an agreement with the County to reimburse the County for the cost of staffing Fire Station 51 with a permanent fire inspector to serve the needs of implementation of the Project during Project construction activities and ongoing expanded operations.

Mitigation Measure K.1-5: Expanded County fire fighting facilities shall be provided to serve the proposed Project. The expanded facilities may be a new fire station or remodeling of the existing Fire Station 51 to accommodate additional equipment and staffing (Facility Improvements). The decision to remodel the existing station or construct a second additional station is solely the County Fire Department's based upon its determination of service needs. The new fire station, if this option is selected, shall be a "four-man" station built to County Fire Department's specifications that could accommodate a new "quint", or similar equipment approved by the County Fire Department, with a minimum of four firefighter positions. The Applicant or its successor shall construct or cause to be constructed and furnish the Facility Improvements at no cost to the County providing the quint and ancillary equipment for the quint, or similar equipment at no cost to the County. The County Fire Department shall be responsible for staffing costs. The Facility Improvements shall be constructed/conveyed to the County Fire Department before building permits are issued for: (a) the first new building that is 75-feet or greater in height; (b) the first new building that is 70,000 square-feet in total floor area; or (c) the last of multiple buildings less than 75 feet in height that cumulatively exceed 100,000 square feet of floor area in the same vicinity. The Applicant or its successor and the County Fire Department shall work together to appropriately locate the station.

Mitigation Measure K.1-6: The Applicant or its successor shall engage in an annual review through Project build-out with the County Fire Department to determine fire service needs of the Project Site.

Mitigation Measure K.1-7: Prior to the issuance of a certificate of occupancy, the Applicant or its successor shall contact the local water purveyor, if the fire hydrant is public, or a private sprinkler contractor, if the fire hydrant is private, to have the closest existing fire hydrant(s) to the location under review verified and tested to the satisfaction of the County Fire Department by conducting a fire flow availability test.

6. Level of Significance After Mitigation

Implementation of the proposed Project results in the need for increased facilities, equipment and staffing for both the City Fire Department and the County Fire Department. It is also anticipated that with full Project implementation a potentially significant impact could occur due to the possible expansion of existing facilities to accommodate the placement of new equipment or by the potential construction of a new fire station facility or facilities to maintain existing service levels in and around the area of the Project Site. Mitigation measures have been included to assure that adequate fire services and facilities are available to meet the needs of the proposed Project. After mitigation, no significant impacts would occur under the proposed Project or the No Annexation scenario. Furthermore, Project development would generate substantial new tax revenues that could be used for funding of the potential expansion of fire services or of new facilities within the Project Site.