# IV. Environmental Impact Analysis

# J.1 Public Services—Fire Protection

## 1. Introduction

This section provides an analysis of the Project's potential impacts on fire protection and emergency medical services. As described throughout this Draft EIR, while the Ford Theatres are owned and operated by the County of Los Angeles, the Project Site is located within the City of Los Angeles. Accordingly, the Project would be built in accordance with the County of Los Angeles Fire Department (County Fire Department) requirements and emergency fire protection and medical services for the Project Site would be provided by the City of Los Angeles Fire Department (LAFD). The analysis provided herein describes existing fire protection and emergency medical services in the Project vicinity and addresses service capacity, fire flow requirements, emergency response times, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current equipment and staffing levels. The analysis is based, in part, on information provided by the LAFD, which is included in Appendix K of this Draft EIR, and the County Fire Department as well the *Water System and Supply Study* prepared for the Project by Mollenhauer in March 2014, which is included in Appendix M of this Draft EIR.

## 2. Environmental Setting

### a. Regulatory Framework

#### (1) State

The California Building Code (California Code of Regulations, Title 24) is a compilation of building standards, including fire safety standards for new buildings, which are provided in the California Fire Code (California Code of Regulations, Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2013 edition of the California Building Code became effective on January 1, 2014 and incorporates by adoption the 2012 edition of the

International Building Code of the International Code Council, with California amendments.[1] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. The 2013 California Fire Code also went into effect on January 1, 2014.[2] Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Also addressed are fire flow requirements, fire hydrant spacing, and access road specifications. Specific California Fire Code fire safety regulations have been incorporated by reference in both the Los Angeles County Code and the City of Los Angeles Municipal Code (LAMC), with local amendments.

In addition, Title 19 of the California Code of Regulations addresses public safety and includes State Fire Marshal requirements (California Code of Regulations, Title 19, Division 1), which incorporate general fire and panic safety standards. Included among these are specifications regarding fire department access and egress, fire alarms, emergency planning, and evacuation procedures.

## (2) County of Los Angeles

### *(a) Los Angeles County General Plan*

The current General Plan, adopted in 1980, includes relevant policies that focus on the coordination of fire fighting efforts and the reduction of fire hazards. Refer to Section IV.H, Land Use, of this Draft EIR for a listing of the General Plan policies that pertain to fire protection. As discussed in the General Plan policy consistency analysis provided therein, the Project would be consistent with the applicable General Plan polices related to fire protection.

### *(b) Los Angeles County Fire Code and Building Code*

The Los Angeles County Fire Code (County Code, Title 32) and Building Code (County Code, Title 26) establish standards for the construction, design, and distribution of fire suppression facilities. The requirements address such issues as fire flow, minimum

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[1] *California Building Commission, California Building Standards Code (Title 24, California Code of Regulations), http://www.bsc.ca.gov/codes.aspx, accessed March 17, 2014.*

[2] *California Fire Code, Title 24, https://law.resource.org/pub/us/code/bsc.ca.gov/gov.ca.bsc.2013.09.pdf, accessed March 17, 2014.*

distance to fire stations, and public and private fire hydrants. With respect to fire flows, water pressure, and hydrant spacing, the County Fire Code requirements vary based on land use, building size, density, and terrain. In addition, fire prevention issues addressed in the County Fire Code include the provision of access roads, adequate road widths, and clearance of brush around structures located in hillside areas that are considered wildland fire risk areas.

Specific requirements within wildland fire risk areas include preparation and implementation of fuel modification plans, which are required to be submitted to the Forestry Division of the County Fire Department for review and approval prior to the issuance of building permits. According to section 4902.1 of the County Fire Code, a fuel modification plan shall consist of a set of scaled plans that include a plot plan showing fuel modification zone(s) indicated with applicable assessment notes, a detailed landscape plan, and an irrigation plan. The fuel modification plan shall be prepared by a State licensed landscape architect, State licensed landscape contractor, a landscape designer, or an individual with expertise acceptable to the Forestry Division. As part of fuel modification plans, a fuel modification zone shall be identified. A fuel modification zone is a strip of land where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, fire resistant plants. Fuel modification zones are strategically placed around developments as a buffer to open space or areas of natural vegetation to provide defensible space necessary for effective fire protection.[3]

## (3) City of Los Angeles

### *(a) City of Los Angeles Charter*

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

### *(b) Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general

[3] *County of Los Angeles Fire Department, Fuel Modification Plan Guidelines, Adopted January 1998, www.fire.lacounty.gov/Forestry/PDF/FuelModificationPlan.pdf, accessed March 17, 2014.*

guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Under the General Plan Framework, the City standard for response distance from a fire station is 1.5 miles.[4]

### *(c) City of Los Angeles General Plan Safety Element*

The City's General Plan Safety Element, adopted on November 26, 1996, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the General Plan Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities. For example, Policy 2.1.6 requires the LAFD to revise regulations and procedures to include the establishment of minimum standards for the location and expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and emergency medical service response. In addition, the City of Los Angeles General Plan Safety Element designates disaster routes. The nearest designated disaster route to the Project Site is Highland Avenue, located approximately 0.2 mile west of the Project Site.[5]

### *(d) Los Angeles Municipal Code*

The Fire Prevention and Protection Chapter of the City of Los Angeles Municipal Code sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires and life safety hazards, the elimination of fire and life safety hazards in any building or structure (including buildings under construction), the maintenance of fire protection equipment and systems, and the storage, use, and handling of hazardous materials.[6]

Section 57.507.3.3 of the LAMC states the maximum response distance for industrial and commercial uses, which includes the Project, from fire stations with an engine company is one mile and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

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[4] *City of Los Angeles General Plan Framework, page 9-5.*

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

[6] *LAMC Article 7, Chapter V, Former Article 7 Repealed and Replaced by Ordinance Number 182,822, effective January 10, 2014, known as the Los Angeles Fire Code. This updated version of the Los Angeles Fire Code incorporates by reference portions of the 2013 edition of the California Fire Code and the 2012 edition of the International Fire Code.*

## b. Existing Conditions

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

As discussed above, fire protection and emergency medical services to the Project Site would be provided by LAFD. The LAFD serves as the City of Los Angeles' life safety agency with approximately 3,586 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across the LAFD's 471-square-mile jurisdiction. At any given time, a total of 1,104 firefighters, including 242 paramedics, are on 24-hour duty. In addition, the LAFD is supported by 353 technical and administrative personnel. [7]

As shown in Figure IV.J.1-1 on page IV.J.1-6, there are three LAFD fire stations located in the vicinity of the Project Site. The closest station to the Project Site is Fire Station No. 76, which is the designated "first in" station, located at 3111 Cahuenga Boulevard East, approximately one mile north of the Project Site.[8] As shown in Table IV.J.1-1 on page IV.J.1-7, Fire Station No. 76 consists of one fire engine, one basic life support (BLS) paramedic rescue ambulance and houses six full-time firefighters.[9] Secondary fire stations that serve the Project Site include Fire Station No. 27 located at 1327 North Cole Street, approximately 1.7 miles south of the Project Site and Fire Station No. 41 located at 1439 Gardner Street, approximately 2.1 miles southwest of the Project Site. As shown in Table IV.J.1-1, equipment at Fire Station No. 27 consists of one engine, one pump engine, one ladder truck, and two ambulances, and Fire Station No. 27 houses 15 firefighters and a battalion chief. Equipment at Fire Station No. 41 consists of one engine, one advance life support (ALS) ambulance, and one BLS ambulance and Fire Station No. 41 houses eight full-time firefighters.

As shown in Table IV.J.1-2 on page IV.J.1-8, Fire Station No. 76 has an average emergency response time of 6 minutes, 41 seconds. Fire Station No. 27 has an average emergency response time of 5 minutes, 4 seconds, and Fire Station No. 41 has an average emergency response time of 5 minutes, 45 seconds.

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[7] *LAFD, Department Overview, http://lafd.org/administration/97-lafd-administration/320-department-overview, accessed March 14, 2014.*

[8] *Written correspondence from Luke A. Milick, Captain I, LAFD, March 11, 2014. Refer to Appendix K of this Draft EIR.*

[9] *Ibid.*


**Figure IV.J.1-1**
Loation of Fire Stations in the Project Vicinity



Source: Google Earth Pro, 2014.

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

| Station No., Location, and Community Served | Distance from Project Site | Equipment | Staffing |
|---|---|---|---|
| Fire Station No. 76<br>3111 Cahuenga Boulevard East<br>Cahuenga Pass | 1 mile | • 1 Engine<br>• 1 BLS Ambulance | • 6 full-time firefighters |
| Fire Station No. 27<br>1327 North Cole Avenue<br>Hollywood | 1.7 miles | • 1 Pump engine<br>• 1 Engine<br>• 1 Ladder Truck<br>• 2 Ambulances | • 1 Battalion Chief<br>• 15 Firefighters |
| Fire Station No. 41<br>1439 North Gardner Avenue<br>Hollywood (Hills and Northwest) | 2.1 miles | • 1 Engine<br>• 2 Ambulances (BLS & ALS) | • 8 full-time Firefighters |

*Source: Email correspondence from Luke A. Milick, Captain I, LAFD, Hydrant and Access Unit, March 11, 2014. See Appendix K of this Draft EIR.*

### (2) Emergency Access

Access to the Project Site, including emergency access, is currently provided via four driveways along the east side of Cahuenga Boulevard East.

### (3) Fire Water Infrastructure

The Los Angeles Department of Water and Power (LADWP) provides water for domestic and firefighting services to the Project Site. Domestic and fire water service to the Project Site is provided from a 4-inch water service lateral line that connects to an 8-inch LADWP water main located in Cahuenga Boulevard East. Based on a Service Advisory Report coordinated between LADWP and the County Fire Department, included in Appendix K of this Draft EIR, the water main has a fire flow of 1,750 gallons per minute (gpm) at a residual pressure of 72 pounds per square inch (psi). The Project Site is served by two existing public fire hydrants located along the public sidewalk of Cahuenga Boulevard, west of the Project Site. Currently, the Project Site does not have a dedicated separate fire service meter, supply line, or on-site fire hydrants.

**Table IV.J.1-2**
**Average Emergency Medical Service and Structure Fire Response Times**[a]

| Station | Average Response Time to (Minutes:Seconds) |
|---|---|
| Fire Station No. 76 | 6:41 |
| Fire Station No. 27 | 5:04 |
| Fire Station No. 41 | 5:45 |

[a] *The average time to respond to an emergency medical service and structure fire emergency call combined.*

*Source: Email correspondence from Luke A. Milick, Captain I, LAFD, Hydrant and Access Unit, March 11, 2014. See Appendix K of this Draft EIR.*

### (4) Wildfire Risk

Due to unique fuel, terrain, and climatic conditions, brush fires are a major threat to life and property throughout the southern California region. Areas in the City and the County that are susceptible to wildfires include areas that lie within the urban/wildland interface. The Project Site is situated within the Hollywood Hills, surrounded by relatively steep, undeveloped hillsides. As such, the Project Site is located within a Very High Fire Hazard Severity Zone as identified by the City of Los Angeles.[10]

### (5) Fiscal Year 2011-2012 LAFD Deployment Plan[11]

Economic conditions over the last several years have resulted in greatly reduced revenues for the City, resulting in cutbacks to City services. In Fiscal Year 2009, the City requested that the LAFD cut its budget by 30 percent. In response to this condition, the LAFD operated with reduced services, in a program called the Modified Coverage Plan. This plan was implemented as an urgent method of containing an unexpected and substantial budget shortfall. As of fiscal year 2011–2012, the LAFD replaced the Modified Coverage Plan with the new Deployment Plan. The Deployment Plan reduces the size of the LAFD due to economic conditions with the objective to create a more effective LAFD using modern technology. This realignment allowed the LAFD to suspend staffing for 7 light forces and 11 engines. However, these apparatuses have not been removed from

[10] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed March 17, 2014*

[11] *LAFD. The New LAFD Deployment Plan, http://lafd.org/community/136-spotlight-articles/416-the-new-lafd-deployment-plan, accessed April 9, 2013.*

service, and the staff from the 18 affected companies has been used to fill other vacant positions within the Department. Under the Deployment Plan, all fire stations have been kept open and since each fire station maintains a minimum of one fire suppression resource and one paramedic unit, response times are not anticipated to change. As such, under the Deployment Plan, LAFD strives to reach all emergency medical service incidents within an estimated 5-minute period ninety percent of the time.

# 3. Environmental Impacts

## a. Methodology

Consultation with the County Fire Department and LAFD was conducted to determine the Project's effect on fire protection and emergency medical services. Fire service needs are dependent on the size of the service population and the geographic area served, the number and types of calls for service, and the characteristics of a project and its surrounding community. Impacts regarding fire services are evaluated by the County Fire Department and LAFD on a project-by project basis, taking into account a project's land use(s), fire protection needs, and whether the project site meets the recommended response time and distance requirements, as well as project design features that would reduce or increase the demand for fire protection services. Additionally, consideration is given to the project size and components, required fire-flow, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials on-site.

## b. Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, Project impacts with regard to fire protection would be significant if the Project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

Additionally, based on Appendix G of the CEQA Guidelines, Project impacts with regard to hazards and hazardous materials associated with wildland fires would be significant if the Project would:

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

## c. Project Design Features

The Project would incorporate building design features that comply with County and City of Los Angeles fire safety requirements, as applicable. Fire safety design features may include, but would not be limited to, the following: use of fire-resistant building materials where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems, portable fire extinguishers, emergency exit signage in all buildings, and fuel modification/brush clearance. The following specific project design features would be included as part of the Project:

**Project Design Feature J.1-1:** A final fuel modification plan shall be prepared for the Project for review and approval by the County of Los Angeles Fire Department Fuel Modification Unit. The fuel modification plan shall include 30 foot and 200 foot buffer zones from all new structures. The 30 foot buffer zone shall provide for replanting of low-growing, irrigated drought-tolerant plant material as a means to prevent erosion and transition to the native character of the Project Site. The 200 foot buffer zone shall provide for seasonal clearing of brush and, as needed, pruning of trees to reduce the amount of potential plant material that could fuel a fire.

**Project Design Feature J.1-2:** Fire department access shall be provided to within 150 feet of building openings. The final design of the access driveways and internal roadways shall be coordinated with the County Fire Department and LAFD, as applicable. The proposed circular, fire department turn-around shall be a pumper truck-sized turn-around.

**Project Design Feature J.1-3:** The Project shall provide automatic fire sprinkler systems, approved by the County Fire Department, within all of the new buildings. With installation of fire sprinkler systems within all of the new buildings, the required fire flow shall be 4,000 gallons per minute with a residual pressure of 20 pounds per square inch.

**Project Design Feature J.1-4:** To accommodate the required fire flow, the Project shall provide two connections to the existing 8-inch high pressure water main in Cahuenga Boulevard East.

**Project Design Feature J.1-5:** The Project shall provide fire hydrants within the Project Site as coordinated with the County Fire Department and LAFD. Booster pumps shall be provided for all proposed fire

hydrants to meet the minimum fire flow rate and pressure requirements of the Project.

**Project Design Feature J.1-6:** The proposed fire system shall be a dedicated separate fire service system with no shared connections to the domestic supply lines.

## d. Analysis of Project Impacts

### (1) Construction

Project construction could temporarily increase the demand for fire protection and emergency medical services within the Project Site as construction activities could potentially expose combustible materials such as wood, plastics, sawdust, covers and coatings, to sources of ignition from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. In compliance with Occupational Safety and Health Administration and Fire and Building Code requirements, construction managers and supervisory personnel would be trained in emergency response and fire safety operations, including the monitoring and management of life safety systems and facilities, and maintaining fire suppression equipment such as fire extinguishers on-site. Additionally, the Project would comply with County requirements to ensure brush clearance and other applicable measures are followed to reduce the likelihood of fire spreading through the surrounding undeveloped hillsides. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Emergency access for City Fire Department vehicles within the Project Site and the surrounding vicinity could also be impacted by Project construction activities due to temporary lane closures, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. As a result, Project construction activities could increase response time for emergency vehicles along Cahuenga Boulevard East and main connectors. However, as discussed in detail in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, the Project would implement a Construction Management Plan during construction of the Project, wherein traffic management personnel and appropriate signage would be employed as necessary to ensure emergency access to the Project Site and vicinity is maintained. In addition, construction worker and haul truck trips would generally occur outside the typical weekday commuter morning and afternoon peak periods. Further, emergency vehicles would utilize emergency sirens to clear a path of travel or drive in opposing traffic lanes to avoid heavy traffic. As such, impacts related to emergency access would be less than significant.

## (2) Operation

### *(a) Facilities and Equipment*

As described in Section II, Project Description, of this Draft EIR, the Project includes the rehabilitation of portions of the existing Amphitheatre and the development of new performance and rehearsal, restaurant, and office uses. The Project does not include the development of any new residential uses and, as such, would not increase the permanent residential population within the service area of Fire Station No. 76. However, the Project would generate an increase in the daytime population associated with employees and users of the hiking trail and restaurant as well as an increase in the population associated with events. As such, the Project's increase in the population within the Project Site would increase the demand for LAFD fire protection and emergency medical services.

As provided in Appendix K of this Draft EIR, in order to adequately identify and assess the full range of the Project's potential impacts on fire protection services, early consultation with the County Fire Department and LAFD was conducted. As indicated by the LAFD, no changes are currently proposed within Battalion 5, which includes the fire station that services the Project Site.[12] In addition, the Project would incorporate building design features that comply with County and City fire safety requirements, as applicable, including, but not limited to, use of fire-resistant building materials where appropriate, smoke detection and fire alarm systems, automatic sprinkler systems, and portable fire extinguishers. Further, as set forth in Project Design Feature J.1-1 above, the Project would implement a fuel modification plan that would identify buffer zones for the planting of specific vegetation and areas where routine landscape maintenance is required. All plantings would be in accordance with the Fuel Modification Plan Guidelines and would require Fire Department approval prior to installation, and undesirable plant species would be avoided except as permitted at specified distances from structures.[13] In addition, the County Fire Department would conduct annual inspections for brush clearance compliance, typically between April and June. A preliminary fuel modification plan has been prepared for the Project and is illustrated in Figure IV.J.1-2 on page IV.J.1-13. The final fuel modification plan would be submitted for review and approval to the County Fire Department Fuel Modification Unit. Implementation of a fuel modification plan would serve to provide adequate defensible space around all potentially combustible structures within a

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[12] *Fire Station No. 76, the "first-in" station for the Project Site is located within Battalion 5. Battalion 5 includes a total of seven fire stations, including the secondary fire stations available to serve the Project Site (Fire Station Nos. 27 and 41).*

[13] *Undesirable plant species include chamise (Adenostoma fasciculatum), California sagebrush (Artemisia californica), buckwheat (Eriogonum fasciculatum), black sage (Salvia mellifera), cypress (Cupressus*

*(Footnote continued on next page)*

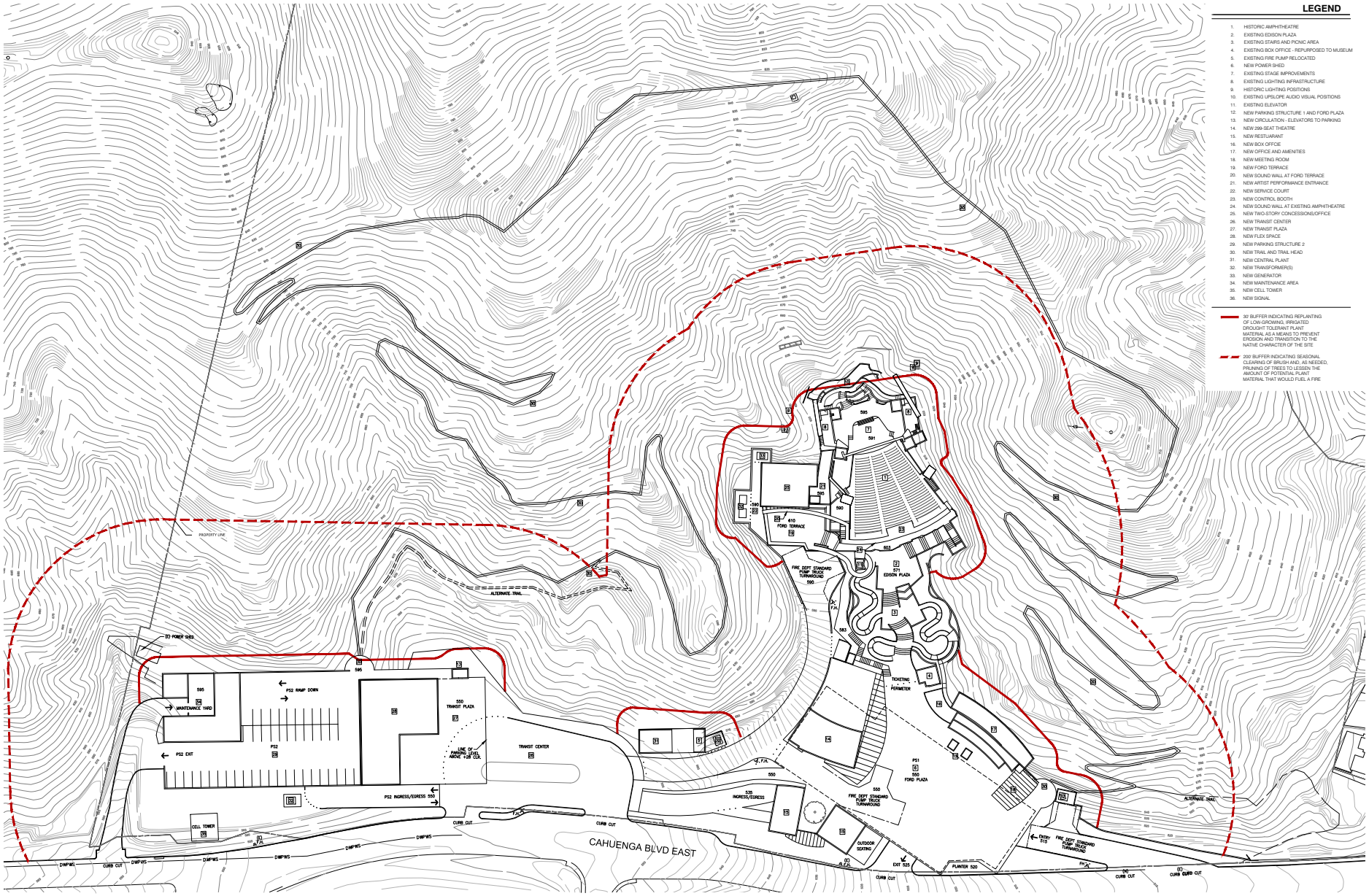


**Figure IV.J.1-2**
Preliminary Fuel Modification Plan



Source: Levin & Associates Architects, 2014.

fire environment. Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided that would reduce the demand for firefighting services. Therefore, based on the type of development proposed and the availability of existing LAFD facilities, impacts with regard to LAFD facilities and equipment associated with the Project would be less than significant

*(b) Response Distance and Emergency Access*

Pursuant to Section 57.507.3.3 of the LAMC, the required emergency response distance for industrial and commercial uses is one mile from fire stations with an engine company, and 1.5 miles from fire stations with a truck company. As previously discussed, Fire Station No. 76 is located approximately one mile northwest of the Project Site and is equipped with one engine and one ambulance. Therefore, the Project would be located within the required emergency response distance.

As described in Section II, Project Description, of this Draft EIR, upon implementation of the Project, access to the Project Site would continue to be available via the four existing driveways along the eastside of Cahuenga Boulevard East with improved internal configuration and circular modifications to accommodate the Project. Specifically, to facilitate access and circulation within the proposed Transit Center, the Project includes one new driveway between the northernmost driveway and the main entrance at the intersection of Cahuenga Boulevard East and Pilgrimage Bridge. The existing circular driveway at the upper gate would also be modified to form the Service Court, which would provide a loading dock and stage loading area to serve events and general facility maintenance such as trash and recycling pickup as well as fire department access. In addition, the Project would incorporate specific access recommendations provided by the County Fire Department and LAFD as set forth in Project Design Feature J.1-2 above. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, as discussed in Section IV.K, Traffic, Access, and Parking, of this Draft EIR, traffic generated by the Project would not result in significant impacts to Project area intersections, including intersections along the closest disaster route along Highland Avenue. Further, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. In addition, the Project would be designed in accordance with emergency vehicle access, clearance, and staging recommendations set forth by the County Fire Department and LAFD. Therefore, Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area. Impacts with regard to response distance and emergency access would be less than significant.

*(c) Fire Flow*

As discussed in Section IV.L.1, Utilities and Service Systems—Water, of this Draft EIR, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. As described in Section II, Project Description, of this Draft EIR, infrastructure improvements related to fire service would include installation of four onsite fire hydrants, illustrated in Figure IV.J.1-3 on page IV.J.1-16.

As provided in Appendix K of this Draft EIR, with implementation of a fire sprinkler system within all of the buildings proposed as set forth in Project Design Feature J.1-3, the required fire flow set forth by the County Fire Department would be 4,000 gpm at a pressure of 20 psi.

As previously described, domestic and fire water service is currently provided from a 4-inch water service lateral line that connects to an 8-inch LADWP water main located in Cahuenga Boulevard East. The water main can provide approximately 1,750 gpm at a residual pressure of 72 psi. To accommodate the required fire flow of 4,000 gpm, the Project would include the installation of two new connections to the existing 8-inch high pressure water main in Cahuenga Boulevard East as provided in Project Design Feature J.1-4 above. In addition, the Project would include the installation of four private fire hydrants on-site and, as set forth in Project Design Feature J.1-5 above, booster pumps would be required for all proposed hydrants to meet the minimum flow rate and pressure requirements around the Project Site. As provided in Project Design Feature J.1-6, the enhanced fire system would be a dedicated separate fire service system with no shared connections to the domestic supply lines.

With construction of the proposed onsite fire water system improvements, the Project would meet the fire flow requirements set forth by the County Fire Department and LAFD. Therefore, impacts regarding fire flow would be less than significant.

*(d) Wildfire Risk*

Given the Project Site's location and surrounding undeveloped hillsides, the potential for fire hazards would exist near the Project Site due to the presence of brush, increased human activity, and the potential for fires due to accidents or arson-related causes. However, due to the Project Site's location within a Very High Fire Hazard Severity Zone, the Project would be required to comply with all applicable City and County requirements regarding construction, access, water mains, fire hydrants, fire flows, and brush clearance for this zone. In addition, as previously described, the Project would implement a fuel modification plan that would identify buffer zones for the planting of specific vegetation and areas where routine landscape maintenance is required so as to

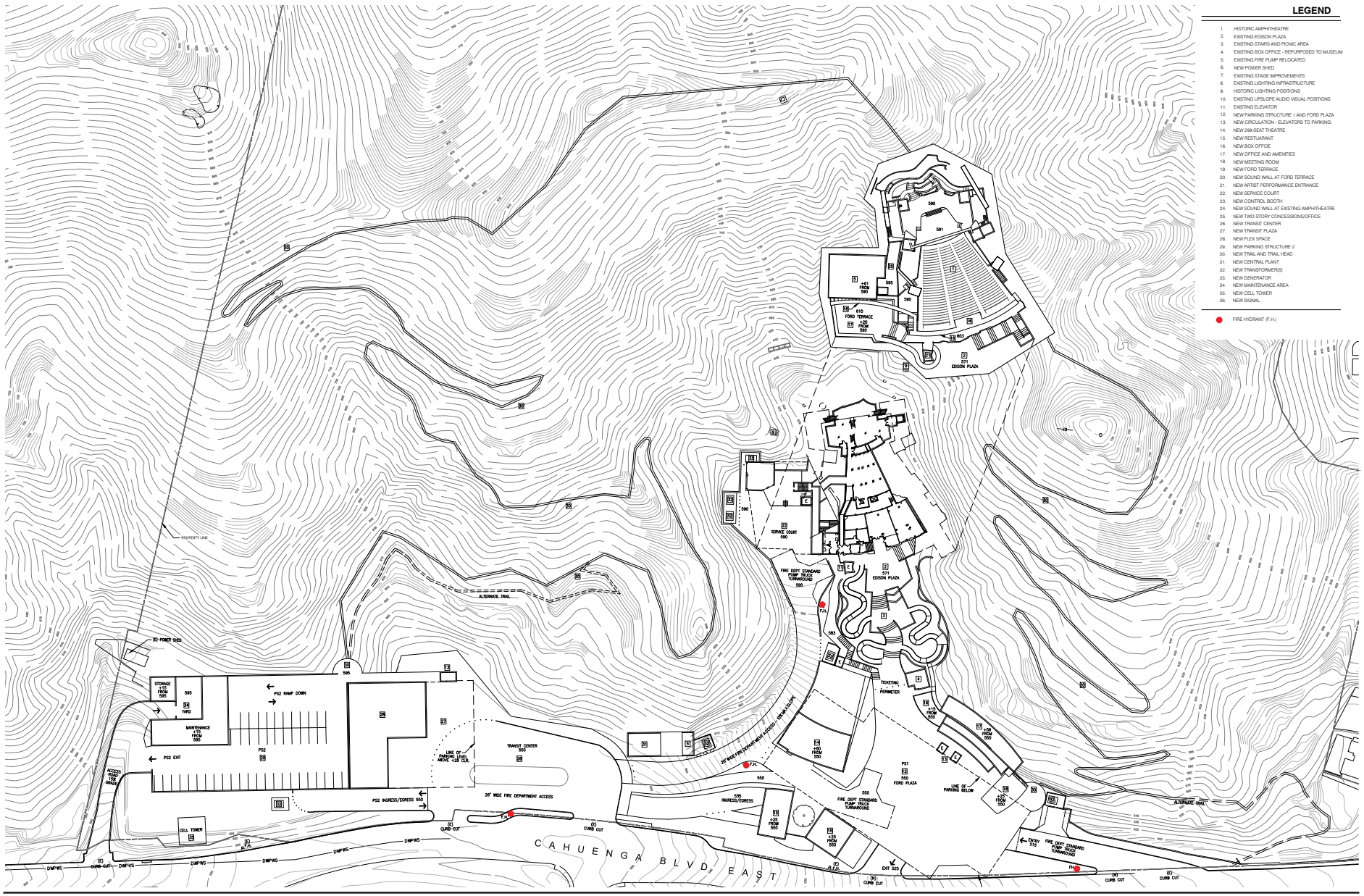


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**Figure IV.J.1-3**
Proposed On-Site Fire Hydrant Locations



Source: Levin & Associates Architects, 2014.

create adequate defensible space around all potentially combustible structures. Routine landscape maintenance would be conducted in accordance with the County Fire Department's Fuel Modification Plan Guidelines and would include pruning; removal of plant litter, dead plants, and unwanted species; and regular inspection and repair of the irrigation system. Through compliance with applicable City and County requirements regarding wildfire risks, as well as approval and implementation of a fuel modification plan, implementation of the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Impacts with respect to wildfire risk would be less than significant.

*(e) Conclusion*

Based on the above, Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing fire station in order to maintain service. Therefore, impacts to fire protection and emergency medical services during Project operation would be less than significant.

# 4. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, cumulative growth in the greater Project area through 2020 includes 27 related projects located in the Project vicinity as well as general ambient growth projected to occur. These related projects include retail/commercial, residential, office, and hotel uses, among others. A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 76, 27, and 41. Several of the related projects include residential uses, which would increase the residential population of Fire Station No. 76, the "first-in" station for the Project Site, as well the secondary fire stations available to provide service to the Project Site. In addition, the related projects would involve an increase in retail, restaurant, hotel, and office uses, which would increase the daytime population of the area and thus also increase the demand on fire services. In conjunction with the Project, this growth would cumulatively generate the need for additional fire protection services. However, similar to the Project, the related projects and all other future development projects would be subject to discretionary review by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project would be required to comply with regulatory requirements related to fire safety, access, and fire flow.

Additionally, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the

desired level of service. Therefore, cumulative impacts on fire protection and emergency medical services would be less than significant.

# 5. Mitigation Measures

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

# 6. Conclusion

Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant.