

IV. Environmental Impact Analysis

J.1 Public Services – Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; inter-departmental correspondence from LAFD to the Department of City Planning dated September 28, 2022, which is included in **Appendix J** of this Draft EIR;¹ and the *Hilton Universal City Utility Infrastructure Technical Report* (Infrastructure Report) prepared by KPFF Consulting Engineers, dated May 2023, which is provided in **Appendix M**, of this Draft EIR.²

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding fire protection at the federal, State, and local levels that apply to the Project. Described below, these include:

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency Aid System
- California Vehicle Code

¹ Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated September 28, 2022. Provided in Appendix J of this Draft EIR.

² KPFF Consulting Engineers, Hilton Universal Utility Infrastructure Technical Report, May 2023. Provided in Appendix M of this Draft EIR.

- California Constitution Article XIII, Section 35
- California Governor’s Office of Emergency Services
- City of Los Angeles Charter
- City of Los Angeles General Plan Framework Element
- City of Los Angeles General Plan Safety Element
- Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan
- Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2023-2026

(1) Federal

(a) *Occupational Safety and Health Administration*

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

(b) *Federal Emergency Management Agency*

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

(c) *Disaster Mitigation Act of 2000*

The Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121-5207) by repealing the

previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Disaster Mitigation Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Disaster Mitigation Act include:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

(2) State

(a) *California Building Code and California Fire Code*

The California Building Code (CBC, California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). CBC 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 2022 edition of the CBC became effective on January 1, 2023.³ The building standards in the CBC apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire

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

hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC with local amendments, as discussed below.⁴

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

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).⁵ The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.⁶

(c) *California Vehicle Code*

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.⁷ This section of the (CVC) states the following:

Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a) (1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety. (b) The operator of every street car shall immediately stop the street car, clear of any intersection, and remain

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

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

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

⁷ A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.

stopped until the authorized emergency vehicle has passed. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(d) California Constitution Article XIII, Section 35

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

(e) California Governor’s Office of Emergency Services (Cal OES)

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state’s preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state’s resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the Statewide mutual aid system (see discussion of Mutual Aid Agreements, above). Cal OES maintains oversight of the State’s mutual aid system.

(3) Local

(a) *City of Los Angeles Charter*

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

(b) *City of Los Angeles General Plan Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.J.1-1, *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies***. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure.⁸ Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.⁹ This is consistent with the specifications for response distances within the LAMC.

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

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

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

Goal/Objective/Policy	Description
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
Policy 9.17.2	Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Policy 9.17.4	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes, or considering discretionary land use permits.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.

SOURCE: City of Los Angeles, General Plan Framework Element, 2001.

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

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 24, 2021, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as shown in **Table IV.J.1-2, Relevant General Plan Safety Element Goals, Objectives, and Policies**. In addition, the City's Safety Element designates disaster routes. According to the Safety Element, primary evaluation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County. However, in response to a more localized emergency, such as a hillside wildfire, the City will identify the most appropriate local egress option and direct individuals to those routes.

Interstates, highways, and primary arterials within the vicinity of the Project Site include US-101, a north/south trending freeway disaster route located approximately 0.05 miles to the south of the Project Site, Lankershim Boulevard, a north/south trending route approximately 0.20 miles to the west of the Project Site, Barham Boulevard, a north/south trending route located approximately 0.7 mile to the southeast of the Project Site, and Ventura Boulevard/Cahuenga Boulevard, an east/west trending route located approximately 0.1 mile to the west of the Project Site.

In addition, the California Government Code specifies General Plan requirements that pertain to safety which can be addressed in the Safety Element or Local Hazard Mitigation Plan (LHMP). The LHMP guides the City in reducing risks from disasters to people, property, economy and environment and complies with federal and State hazard mitigation planning requirements. The current LHMP was adopted in 2018 and is incorporated as a component of the Safety Element.

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

Goal/Objective/Policy	Description
Policy 1.1.6	State and Federal Regulations. Assure compliance with applicable State and federal planning and development regulations. Regularly adopt new provisions of the California Building Standards Code, Title 24, and California Fire Code into the LAMC to ensure that new development meets or exceeds Statewide minimums. Ensure new development in VHFHSZs adheres to the California Building Code, the California Fire Code, Los Angeles Fire Code and California Public Resources Code. Facilitate compliance with new standards for existing non-conforming structures and evacuation routes.
Policy 1.1.8	Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as VHFHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.
Goal 2	Emergency Response. A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Emergency Response. Develop, implement and continue to improve the City's ability to respond to emergency events. Participate in regularly scheduled disaster exercises to better prepare Police, Fire, Public Works and other City employees with disaster responsibilities.

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

Goal/Objective/Policy	Description
Policy 2.1.6	<p>Standards/Fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression and safety.</p> <ul style="list-style-type: none"> A. Enforce peak water supply / fire flow requirements and ensure that new development is able to sufficiently source water, including in VHFHSZs. B. Enforce minimum roadway widths and clearances for evacuation and fire suppression. C. Maintain special fire-fighting units at the Port of Los Angeles, Los Angeles International Airport, and Van Nuys Municipal Airport capable of responding to special emergencies unique to the operations of those facilities. D. Coordinate with CALFIRE, local fire agencies, fire safe councils, private landowners, and other responsible agencies to identify the best method(s) of fuel modification to reduce the severity of future wildfires, including: Prescribed fire; Forest thinning; Grazing; Mechanical clearing; Hand clearing (piling, burning/chipping); Education; and Defensible space. E. Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Goal 3	Disaster Recovery. A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination. Coordinate between city departments, county and state agencies, local jurisdictions and with appropriate private and public entities prior to a disaster to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster.

SOURCE: City of Los Angeles, General Plan Safety Element, 2021.

(d) *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass
Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and

industrial uses, as well as circulation and service systems. The community plans implement the City's Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to fire protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities. The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, and it includes the following policy with regard to fire protection:

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

(e) *Los Angeles Municipal Code*

The Los Angeles Fire Code (LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code and the International Fire Code. The City's Fire Code sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials. Specific regulations regarding fire prevention and protection are discussed below.

Section 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste.

Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: LAFD communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

Section 57.118.1.1 requires that all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) must include fire/life safety reviews by the Department of Building and Safety and LAFD.

Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency

Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

Section 57.4704.5.1 of the LAMC requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

Section 57.4705.1.6 requires there must be at least one elevator which shall be available for fire EMS and shall have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floors. The elevator or elevators must be interconnected with the standby power.

Section 57.4705.4 requires each building to have a rooftop emergency helicopter landing facility in a location approved by the Chief, unless certain life safety features, as specified in LAFD Requirement No. 10, are provided and approved by the Fire Marshal in compliance with two options.

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

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

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

Section 57.507.3.3 limits the maximum response distances to an LAFD station based on the type of land use. Applicable distances are based on LAFD's comment letter for each individual project. If response distances to an LAFD station based on type of land use are not met, this LAMC section requires the installation of an automatic fire sprinklers system (Table 57.507.3.3).

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

(f) *Propositions F and Q*

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated \$532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated \$378.6 million to build 19 new or replacement neighborhood Fire/Paramedic Stations and an Emergency Air Operations and Helicopter Maintenance Facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.¹⁰ Also, as reported in November 2019, BOE completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.¹¹ Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated \$600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.¹²

(g) *Measure J*

Measure J, which was approved by voters at the November 7, 2006 General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.

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

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

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

(h) *Los Angeles Fire Department Strategic Plan 2023-2026*

The Los Angeles Fire Department Strategic Plan 2023-2026, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2023-2026 builds upon the progress of the first Strategic Plan from 2015–2017 and the second Strategic Plan 2018-2020. As provided in the Strategic Plan 2023-2026, seven goals will guide the LAFD for the next three years: (1) Deliver exceptional public safety and emergency services; (2) Promote a safe, healthy, and progressive work environment that effectively manages personal and organization risk; (3) Commit to an organization that embraces diversity, equity, and inclusion; (4) Improve collaboration, participative leadership, and responsible performance management; (5) Foster personal, professional development and organizational succession; (6) Explore, implement and integrate technological innovations and advancements; and (7) Enhance community resilience, disaster recovery capabilities, and environmental sustainability.

b) Existing Conditions

(1) Fire Protection Facilities

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

The LAFD emergency services are divided across four geographic bureaus, including Central, South, Valley, and West. The Project Site is located in LAFD's Operations West Bureau, stationed at Fire Station 76 in the Cahuenga Pass Community and comprised of Battalions 4, 5, and 9. The Operations West Bureau encompasses the western portion of Los Angeles and includes the communities of Bel Air/Holmby Hills, Brentwood, Cahuenga Pass, Hollywood, LAX/ARFF, LAX Area, Los Feliz, Mar Vista, Pacific Palisades, Palisades Highlands, Playa Vista, Sawtelle, Silver Lake, Venice, West Los Angeles, Westchester, and Westwood/UCLA.¹⁴

As shown in **Figure IV.J.1-1, Fire Station Boundaries**, there are five fire stations that provide primary fire protection services to the Project Site and surrounding area. **Table IV.J.1-3, Fire Stations Located in the Project Vicinity**, includes the location,

¹³ LAFD, Department Overview – Our Mission, <https://www.lafd.org/about/about-lafd/our-mission>, accessed October 5, 2022.

¹⁴ LAFD, West Bureau, <https://www.lafd.org/about/west-bureau>, accessed October 5, 2022.

distance/direction from the Project Site, average response times, and equipment for each of these five fire stations.

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

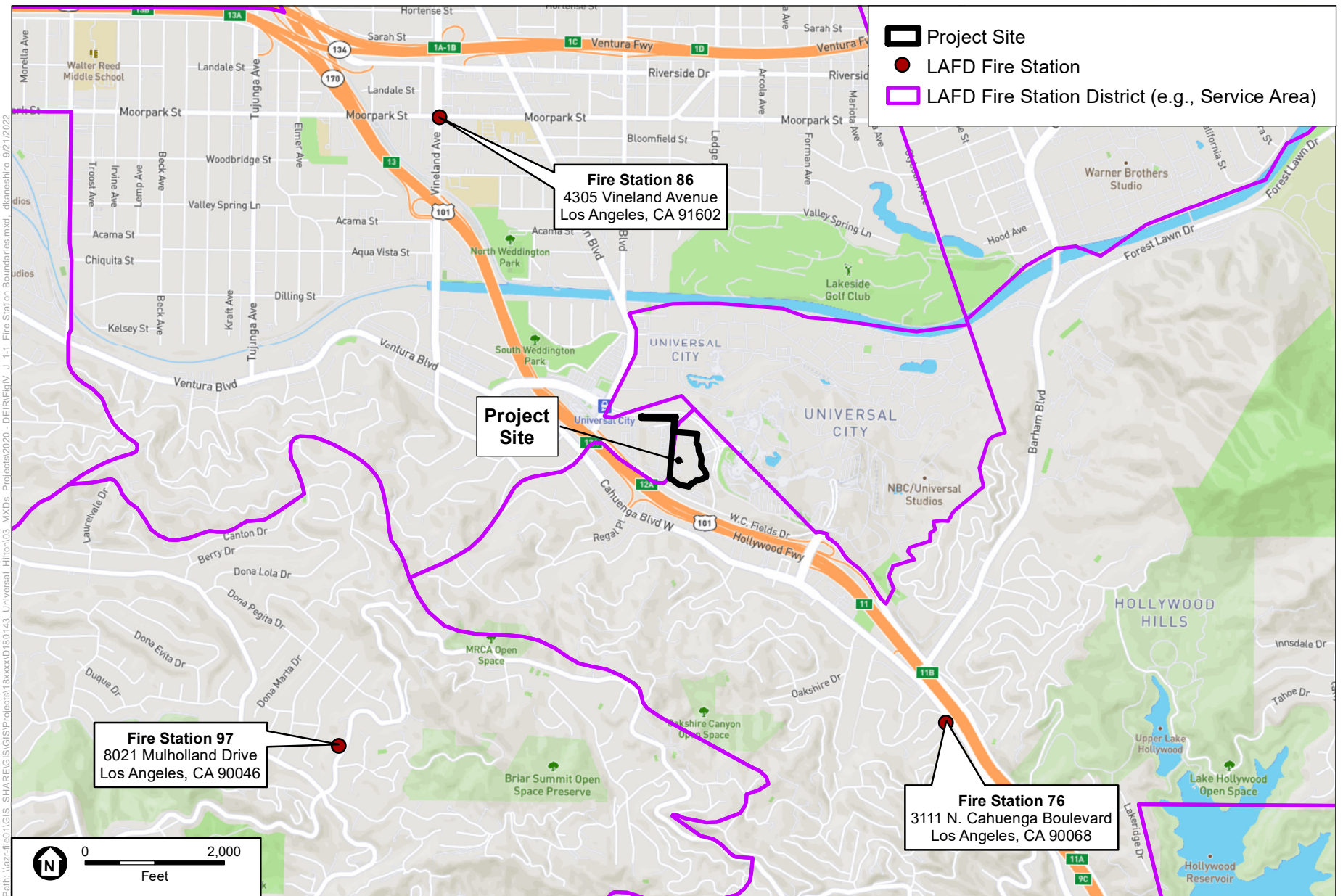
Fire Station / Location	Direction from Project Site	Average Response Times ^{a,b,c}				Equipment
		EMS	Non-EMS	Critical ALS	Structure Fire	
Fire Station 76 3111 North Cahuenga Boulevard	1.4 miles southeast	8:26	8:38	7:09	6:27	Assessment Engine Paramedic Rescue Ambulance
Fire Station 86 4305 Vineland Avenue	1.8 miles northwest	6:34	6:24	5:26	4:44	Assessment Engine Paramedic Rescue Ambulance Swift Water Rescue Team Brush Patrol
Fire Station 97 8021 Mulholland Drive	2.6 miles southwest	8:33	9:04	7:37	9:39	Assessment Engine Paramedic Rescue Ambulance
Fire Station 60 5320 Tujunga Avenue	3.1 miles northwest	6:49	6:21	5:54	5:04	Engine Assessment Light Force Paramedic Rescue Ambulance BLS Rescue Ambulance and Foam Tender
Fire Station 27 2009 S. Western Avenue	4.1 miles southeast	6:58	6:06	5:42	5:07	Assessment Engine Light Force Paramedic Rescue Ambulance BLS Rescue Ambulance

^a LAFD, FireStatLA, <http://www.lafd.org/fsla/stations-map>, accessed November 10, 2020.

^b Average Response times from January through August of 2022 provide the most accurate annual average. Average Response Times include call processing, turn out, and travel time. The Citywide average response time from January through August 2022 is 7:14 for EMS and 6:55 for non-EMS and 6:13 and 5:24 minutes for Critical ALS and Structure Fire respectively.

^c EMS = Emergency Medical Services. Non-EMS = Fire and other services. Critical ALS = Critical Advanced Life Support. Structure Fire = the call type is specifically reserved when the LAFD receives a report of a building or structure that is actively burning. Due to the low frequency, these metrics are reported on a quarterly basis.

SOURCE: LAFD, FireStatLA, <http://www.lafd.org/fsla/stations-map>, accessed October 05, 2022; Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated September 28, 2022. Provided in Appendix J of this Draft EIR.



SOURCE: Open Street Map 2019; City of Los Angeles Open Data: <https://data.lacity.org/>, Accessed November 2020; ESA 2020.

Hilton Universal City Project

Figure IV.J.1-1
Fire Station Boundaries

As shown in Table IV.J.1-3, Fire Station 76 at 3111 Cahuenga Blvd Boulevard is located nearest to the Project Site, approximately 1.4 miles southeast of the Project Site, with Fire Station 86 being incrementally farther (1.8 miles). Fire Station 76 is located within the Operations West Bureau, Fire Station 86 is located within the Operations Valley Bureau. The other stations named by LAFD that would provide support for fire protection services to the Project Site include Fire Station 97, located approximately 2.6 miles southwest of the Project Site, Fire Station 60, located approximately 3.1 miles northwest of the Project Site, and Fire Station 27, located approximately 4.1 miles southeast of the Project Site.

(2) Response Distance

According to the City's Fire Code (LAMC Section 57.507.3.3), the first-due Engine Company should be within 1 mile of the Project Site and the first-due Truck Company should be within 1.5 miles. As indicated in Table IV.J.1-3, Fire Station 76, which is identified as the first due-in station with an Engine Company, is located 1.4 miles from the Project Site. Fire Station 60, which is also identified as the first due-in station with a Truck Company, consists of the Assessment Light Force, which is a Truck Company run with a single Engine in a configuration, and is located 3.1 miles from the Project Site.¹⁵

(3) Response Time

Specific response times for the stations for January through August 2022 are included in Table IV.J.1-3. Fire Station 76, the closest station to the Project Site, had an average response time of 8:26 and 8:38 minutes for EMS and non-EMS incidents, respectively and 7:09 and 6:27 minutes for Critical Advanced Life Support (ALS) and Structure Fire incidents, respectively. As mentioned in Table IV.J.1-3, Structure Fires are the call types specifically reserved for when the LAFD receives a report of a building or structure that is actively burning. Fire Station 86 had an average response time of 6:34 and 6:24 minutes for EMS and non-EMS incidents, respectively, and 5:26 and 4:44 minutes for Critical ALS and Structure Fire incidents, respectively. Fire Station 97 had an average response time of 8:33 and 9:04 minutes for EMS and non-EMS incidents, respectively and 7:37 and 9:39 minutes for Critical ALS and Structure Fire incidents, respectively. Fire Station 60 had an average response time of 6:49 and 6:21 minutes for EMS and non-EMS incidents, respectively and 5:54 and 5:04 minutes for Critical ALS and Structure Fire incidents, respectively. Fire Station 27 had an average response time of 6:58 and 6:06 minutes for EMS and non-EMS incidents, respectively and 5:42 and 5:07 minutes for Critical ALS and Structure Fire incidents, respectively. The Citywide average response times between January and August 2022 were 7.14 and 6:55 minutes for EMS and non-EMS incidents, respectively and 6:13 and 5:24 minutes Critical ALS and Structure Fire incidents, respectively.

These response times are provided for information purposes since the LAFD has not established response time standards for emergency response. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a

¹⁵ LAFD, Apparatus, <https://www.lafd.org/about/about-lafd/apparatus>, accessed October 05, 2022.

response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.¹⁶ The City has over 205 miles of major arterial routes that are equipped with FPS.¹⁷

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression."¹⁸ If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection.

The LAFD has recently taken a number of steps to improve their related systems, processes and practices, which in turn serve to reduce response times. Upgrades recently completed or pending include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; and development of a new computer-aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident.¹⁹

(4) Emergency Access

The Project Site is accessible by emergency vehicles from a number of major roadways (e.g., Lankershim Boulevard, Ventura Boulevard, Cahuenga Boulevard) serving the Project Site. Emergency access to the Project Site is provided directly via Universal Hollywood Drive. The closest fire station with an Engine Company, Fire Station 76, has access to the Project Site from the southeast via Cahuenga Boulevard to Universal Studios Boulevard to W.C. Fields Drive to Hotel Drive to Universal Hollywood Drive or from Cahuenga Boulevard to Lankershim Boulevard to Universal Hollywood Drive. The

¹⁶ LADOT, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

¹⁷ LAFD, Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

¹⁸ NFPA, NFPA 1710 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition. Response time is turnout time plus travel time for EMS and fire suppression incidents.

¹⁹ LAFD, 2023-2026 Strategic Plan,, 2023.

closest station with a Truck Company, Fire Station 60, has access to the Project Site from the northwest via Tujunga Avenue to Magnolia Boulevard and onto US-101 to Cahuenga Boulevard, proceeding to Lankershim Boulevard to Universal Hollywood Drive or from Chandler Boulevard to Lankershim Boulevard to Universal Hollywood Drive.

(5) Water Infrastructure/Fire Flow for Firefighting Services

In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard. Fire flow requirements vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 psi.²⁰

There are six existing public fire hydrants in the immediate vicinity of the Project Site.²¹ Five hydrants are located along Universal Hollywood Drive and one 400 feet southeast of the intersection of Hotel Drive and Universal Hollywood Drive.

3. Project Impacts

a) Thresholds of Significance

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

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate fire protection services impacts include:

- 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.

²⁰ City of Los Angeles, Los Angeles Municipal Code, Ordinance No. 184,913, Section 57.507.3.1, Fire-Flow Requirements.

²¹ KPFF Consulting Engineers, Hilton Universal Utility Infrastructure Technical Report, May 2023, page 15. Provided in Appendix M of this Draft EIR.

b) Methodology

Project impacts regarding fire protection services are evaluated by the LAFD on a project-by-project basis. A project's land use designation, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station, or expansion, relocation, or consolidation of an existing facility, to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effects on fire protection and emergency medical services.

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact but, rather, a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the local vicinity of the Project Site. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire and emergency facilities, that in the event that the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration.

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

c) Project Design Features

The Project would incorporate Fire Code requirements, including those summarized in the letter from LAFD included in Appendix J of this Draft EIR. No specific project design features are proposed with regard to fire protection. However, as discussed in Section IV.K, *Transportation*, of this Draft EIR, pursuant to Project Design Feature TRAF-PDF-2, the Project would implement a Construction Management Plan that would include measures to ensure emergency access to the Project Site and adjacent properties. Project Design Feature TRAF-PDF-2 would minimize impacts to vehicular and other forms of circulation during construction.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Fires associated with construction activities could be caused by exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources, including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with OSHA and the City Building Code and Fire Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, Project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials.

Project construction activities could also potentially affect emergency response times and emergency access to the Project Site and the vicinity due to Project construction traffic and temporary street closures. The Project would be required to implement Project Design Feature TRAF-PDF-2, a Construction Management Plan, to minimize disruptions to traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. As described in Project Design Feature TRAF-PDF-2, a detailed Construction Management Plan will include any applicable street/lane/sidewalk closure information, a detour plan, haul route(s), and a staging plan to ensure adequate access is maintained to the Project Site and neighboring businesses and residences.

The Project Site is located in an established urban area that is well served by an existing road network. As described above in Subsection IV.J.1.2.b)(4), US-101, Lankershim Boulevard, Barham Boulevard, and Ventura Boulevard/Cahuenga Boulevard, are Disaster Routes that could be utilized during a disaster event.²² As such, the Project is largely available to access from the adjacent roadways. Emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Impacts to fire protection services would be considered less than significant for all the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD (refer to Project Design Feature TRAF-PDF-2 in Section IV.K, *Transportation*, of this Draft EIR);
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly 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, in accordance with Section 21806 of the California Vehicle Code. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

As the Project would maintain emergency access during construction, which is temporary in nature, and emergency vehicles have options for avoiding traffic, Project construction would not result in substantial adverse impacts to emergency response times and emergency access, which would consequently not affect service ratios, response times, other performance objectives for fire protection.

(i) Conclusion

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically-altered government facilities, need for new or physically-altered government 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. Therefore, impacts to fire protection and emergency medical services during Project construction would be less than significant.

(b) Operation

(i) Facilities, Equipment, and Fire Flow

Greater occupation and activity at the Project Site have the potential to increase the need for fire protection services at the Project Site. The section analyzes the Project's

²² County of Los Angeles Department of Public Works, Disaster Routes by City, City of Los Angeles Central Area, website: Disaster Route Maps - By City (lacounty.gov), accessed November 2022..

potential operational impacts on LAFD services, facilities and equipment, fire flow, and response distances.

With regard to fire flow, in general, the required fire flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Based on the Utility Infrastructure Technical Report prepared for the Project, and included as Appendix M of this Draft EIR, the LAFD has determined that the required fire-flow for the Project, which falls within the industrial and commercial category, would be 9,000 gpm (total) from six fire hydrants flowing simultaneously with a residual water pressure of 20 psi.²³ This translates to a required flow of 1,500 gpm for each hydrant.

An IFFAR was submitted to the LADWP to confirm adequate fire flow pressure for the Project from the existing infrastructure. LADWP indicated in the IFFAR results that the six nearby fire hydrants flowing simultaneously would result in a combined flow of 9,000 gpm at or above 20 psi. Refer to the IFFAR results in Exhibit 2 as provided by LADWP, which confirm that the Project has adequate fire flow available to comply with LAMC Section 57.507.

As detailed in Table IV.J.1-3, Fire Station 76 (an Engine Company) is located approximately 1.4 miles southeast of the Project Site. In addition, Fire Station 60 (a truck Company) is located approximately 3.1 miles northwest of the Project Site. Fire Station 86 and Fire Station 97 located approximately 1.8 miles northwest and 2.6 miles southwest of the Project Site respectively, would provide back-up response to the Project Site. Furthermore, an additional Truck Company is located at Fire Station 27, 4.1 miles to the southeast. LAMC Section 57.507.3.3 provides for the following response distances, which, if exceeded, require the installation of an automatic fire sprinklers system: one mile for an Engine Company and 1.5 miles from a Truck Company for a high-density residential and commercial development. Both Fire Station 76 and Fire Station 60 do not meet either distance standards for an Engine Company or Truck Company. Because the serving fire stations do not meet the LAFD response distance requirements, the Project would install an automatic sprinkler system per LAMC Section 57.507.3.3, which would fully address LAFD's response criteria.

Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm for all buildings on the Project Site, which as shown by the approved Fire Service Advisory Request (SAR) (see Exhibit 3 of the Infrastructure Report), can be supplied to the Project Site by LADWP. With compliance with LAFD and LADWP requirements, fire flow impacts would be less than significant. The Project will protect existing and install new fire and domestic infrastructure

²³ KPFF Consulting Engineers, Hilton Universal Utility Infrastructure Technical Report: Water, March 2020, page 8. Provided in Appendix M of this Draft EIR.

to meet the proposed fire suppression demands in compliance with LAFD, Los Angeles Department of Building and Safety (LADBS) and LADWP requirements.

The Project would comply with applicable regulatory requirements of the City Fire Code, and development plans would be subject to review and approval by the LAFD.

The Project would comply with the applicable OSHA and City Building Code and Fire Code requirements, including: the provision of fire resistant doors, materials, walkways, stairwells, and elevator systems (including emergency and fire control elevators); installation of a fire sprinkler suppression system, smoke detectors, signage, fire alarms, building emergency communication systems, smoke control systems; implementation of an Emergency Safety Plan; compliance with LAFD fire apparatus and personnel access requirements; and water systems and roadway improvements improved to the satisfaction of the LAFD. In addition, the Project would comply with LAFD's preliminary recommendations contained in correspondence provided in Appendix J of this Draft EIR. The LAFD recommended a variety of fire prevention and protection features including, but not limited to, building identification, emergency access lanes, building setbacks, fire hydrants, and private roadway widths.

Compliance with applicable City Building Code and Fire Code requirements and recommendations would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118. LAFD review and approval of final plans and specifications will be required prior to the issuance of a building permit to ensure the recommendations provided in Appendix J are included in the Project.

Compliance with applicable regulatory requirements and recommendations, including LAFD's fire/life safety and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities.

(ii) *Emergency Access*

As described in Chapter II, *Project Description*, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided from Universal Hollywood Drive via ingress and egress driveways. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to within and in the vicinity of the Project Site. In addition, the Project includes the installation of a service road along the eastern side of the Project Site and emergency response vehicles could utilize the service road for access. The design of the service road includes a turnaround which would accommodate fire trucks/engines and would be located at the terminus of the service road in the southern portion of the Project Site. Additionally, the main access road to the Hotel includes a circular turnaround at South Plaza. As such, emergency access to the Project Site would be maintained at all times.

It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of primary and secondary arterials, and collector and local streets that provide regional, sub-regional, and local access and circulation within the local Project vicinity. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to Section 21806 of the California Vehicle Code and multiple station response. Furthermore, each of the fire stations that serve the Project Site have multiple routes available to respond to emergency calls at the Project Site. Additionally, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

(iii) Conclusion

Based on the above, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, impacts to fire protection and emergency medical services during Project operation would be less than significant.

(2) Mitigation Measures

Impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Impacts to LAFD services and facilities for each of the related projects would be addressed as part of each related project's development review process conducted by the City. Each related project would be subject to the City's routine permitting process, which would include a review by the LAFD to ensure that sufficient measures are implemented to reduce potential impacts to fire protection services.

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 15 related projects (one in the County of Los Angeles and 14 in the City of Los Angeles). While the related project located within the County of Los Angeles is not located in the jurisdiction of the City, based on the Mutual Aid Plan, as jurisdictions around the City of Los Angeles may be impacted by LAFD services, this related project was considered in this cumulative analysis as the Project. The related projects located within the City are located within the fire station service areas of the same LAFD Fire Stations that would serve the Project (i.e., Fire Stations 76 and 86). Additionally, the Los Angeles County Fire Department Station 51 is located within 0.8 miles of Related Project 1, which is within the County of Los Angeles.²⁴

(a) Construction

As with the Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions, in combustible materials and coatings, and lighted cigarettes. However, similar to the Project, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health regulations for construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

In the event that Project construction occurs concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-ways. Since the Project would not require substantial narrowing of adjacent public rights-of-ways that may be hazardous to roadway travelers, the Project would not

²⁴ LA County Fire, Search Results for 91608, <https://locator.lacounty.gov/fire/Search?find=&near=91608&cat=&tag=&loc=&lat=34.13&lon=-118.35>, accessed 07 October 2022.

have significant impacts on access and safety. Similar to the Project, each related project would implement similar design features during construction and would be subject to the City's routine construction permitting process, or equivalent permitting process for the related project in the County of Los Angeles, which includes a review by LAFD to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and related projects would not significantly impact LAFD response times within the Project Site vicinity as drivers of fire and emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes opposing traffic, pursuant to Section 21806 of the California Vehicle Code. Finally, the Project in and of itself would not cause a significant impact to fire protection services during construction.

(b) Operation

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

As stated by LAFD, the development of the Project and the related projects may result in the need for increased staffing for existing facilities (such as Paramedic Rescue Ambulance and EMT and Rescue Ambulance resources), additional fire protection facilities, and relocation of present fire protection facilities.²⁵ However, with regard to facilities and equipment, similar to the Project, the related projects would be required to implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire-flow, storage and management of hazardous materials, and alarm and communications systems. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided and reduce demand on LAFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic fire sprinklers to enhance fire safety that would further reduce the demand placed on the LAFD facilities and equipment.

The Project, as well as the related projects, would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other

²⁵ Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated September 28, 2022. Provided in Appendix J of this Draft EIR.

special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

With regard to response distance, given that the related projects are generally located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. Additionally, in accordance with Fire Code requirements, if a related project would not be within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Project, the related projects would be required to comply with all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review prior to the issuance of a building permit.

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

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection service is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time, as appropriate.²⁶ At this time, LAFD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 2 acres in size (such as the five stations identified as serving the Project Site), and (3) would likely qualify for a Categorical Exemption under CEQA

²⁶ City of Los Angeles, Budget for the Fiscal Year 2018-19, modified and adopted by City Council on May 25, 2018.

Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location for a new fire station or expansion or alteration of the existing fire stations which would service the Project Site and the related projects' sites, would be speculative and, therefore, beyond the scope of this Draft EIR.

(c) *Conclusion*

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

(2) Mitigation Measures

Cumulative impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.