

IV. Environmental Impact Analysis

L.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; the Utility Infrastructure Technical Report (Utility Report), prepared by KPFF in January 2025, which is included in Appendix M of this Draft EIR; and Inter-departmental correspondence from LAFD to the Department of City Planning (August 13, 2024), which is included as Exhibit 1 of the Utility Report.

2. Environmental Setting

a. Regulatory Framework

There are several plans, policies, and programs regarding fire protection at the federal, State, and local levels. 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
- 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
- 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) and 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 the 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); and
- 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, 2023.¹ 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 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.²

(b) California Fire Service and Rescue Emergency Mutual 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).³ 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 Cal 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.⁴

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.⁵ This section of the CVC states the following:

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

² *Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.*

³ *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.*

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

⁵ *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.*

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 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

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.L.1-1 on page IV.L.1-7. 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.⁶ 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

⁶ *City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services.*

**Table IV.L.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.
<hr/> <p><i>Source: City of Los Angeles, General Plan Framework Element, 2001.</i></p>	

land uses is 1.5 miles.⁷ This is consistent with the specifications for response distances within the LAMC.

(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.L.1-2 on page IV.L.1-8.

⁷ *City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire.*

**Table IV.L.1-2
Relevant General Plan Safety Element Goals, Objectives, and Policies**

Goal/ Objective/ Policy	Description
Policy 1.1.3	Facility/Systems Location and Maintenance. Locate new critical facilities and infrastructure outside of hazard areas, especially VHFHSZs, when feasible. If no feasible alternative site exists, ensure that these facilities incorporate all necessary protections to allow them to continue to serve essential community needs during and after disaster events. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions and the growing climate emergency.
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	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	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.
Policy 2.1.6	Standards/Fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression and safety. <ul style="list-style-type: none"> • Enforce peak water supply/fire flow requirements and ensure that new development is able to sufficiently source water, including in VHFHSZs. • Enforce minimum roadway widths and clearances for evacuation and fire suppression. • 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. • 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.

Table IV.L.1-2 (Continued)
Relevant General Plan Safety Element Goals, Objectives, and Policies

Goal/ Objective/ Policy	Description
	<ul style="list-style-type: none"> 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	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.
<hr/> <p><i>Source: City of Los Angeles, General Plan Safety Element, 2021.</i></p>	

As also noted in the Safety Element, California Government Code Section 65302(g)(1) specifies the need to plan for swift evacuation in the event of a fire or other emergency. In response, the City includes a wide range of physical environments and dramatic differences in population density based on the time of day or day of the week. To better accommodate the variety of evacuation scenarios, the City has developed a dynamic approach to evacuation response, one that can respond to different conditions. As specified in the City's Emergency Operations Plan (EOP) Evacuations Annex, "primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County."⁸ However, in response to a more localized emergency, such as a hillside wildfire, LAFD works in coordination with the Los Angeles Department of Transportation (LADOT) and Los Angeles Police Department to identify the most appropriate local egress option and direct individuals to those routes. Other routes are shared in real time depending on which disaster and suitable evacuation routes are identified.⁹

⁸ *City of Los Angeles. Safety Element of the General Plan, p. 23, 2021.*

⁹ *Los Angeles Safety Element, November 2021, p. 23.*

(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 (Community Plan) area. The Community Plan, adopted on May 13, 1998, includes the following objectives and policies that are relevant to fire protection:

Goal 9: Protect the community through a comprehensive fire and life safety program.

Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.

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.

LAMC 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.

LAMC Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the City of Los Angeles Department of Building and Safety (LADBS): 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.

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

LAMC 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 LADBS and LAFD.

LAMC 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).

LAMC Section 57.4704.5.1 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.

LAMC Section 57.4705.1.6 requires that there to 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.

LAMC 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.

LAMC 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.

LAMC Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential developments to 12,000 gpm for high-density commercial or industrial areas (where local conditions indicate that consideration must be given to simultaneous fires, an 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.

LAMC 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.

LAMC 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.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 miles for stations with an engine company to two miles for a truck company, shall comply with LAMC 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 two 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, the City's

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

Department of Public Works, Bureau of Engineering (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 2 acres.

(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 previous Strategic Plan from 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 organizational 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.

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.*

b. Existing Conditions

(1) Fire Protection Services and Facilities

The LAFD serves as the City’s life safety agency with approximately 3,510 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 LAFD’s approximately 469-square-mile jurisdiction. A total of 1,018 firefighters are on 24-hour duty. In addition, LAFD is supported by 392 technical and administrative personnel.¹³

As shown in Figure IV.L.1-1 on page IV.L.1-15, there is one LAFD fire station located within a two-mile- radius of the Project Site. The closest station to the Project Site is Fire Station No. 78, which is the designated “first-due” station, located approximately 0.9 miles west of the Project Site at 4041 Whitsett Avenue.¹⁴ As provided by the LAFD and summarized in Table IV.L.1-3 on page IV.L.1-16, Fire Station No. 78 consists of an assessment light force, a paramedic rescue ambulance, a basic life support (BLS) rescue ambulance, and a staff of 13.¹⁵

LAFD also identified four additional fire stations beyond a two-mile radius of the Project Site that could serve the Project Site. Fire Station No. 86, which is located approximately 2.1 miles northeast of the Project Site at 4305 Vineland Avenue, consists of an assessment engine, a paramedic rescue ambulance, and a staff of six.¹⁶ Fire Station No. 97, located approximately 2.5 miles southeast of the Project Site at 8021 Mulholland Drive, consists of an assessment engine, a paramedic rescue ambulance, and a staff of six.¹⁷ Fire Station No. 60, which is located approximately 2.6 miles northeast of the Project Site at 5320 Tujunga Avenue, consists of an assessment light force, an engine, a paramedic rescue ambulance, a BLS rescue ambulance, a battalion supervisor, and a staff of 16.¹⁸ Fire Station No. 102, which is located approximately 3.5 miles northwest of the Project Site at

¹³ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed January 15, 2025.

¹⁴ LAFD, *Find Your Station*, www.lafd.org/fire-stations/station-results, accessed January 15, 2025.

¹⁵ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 13, 2024.

¹⁶ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 13, 2024.

¹⁷ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 13, 2024.

¹⁸ Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 13, 2024.

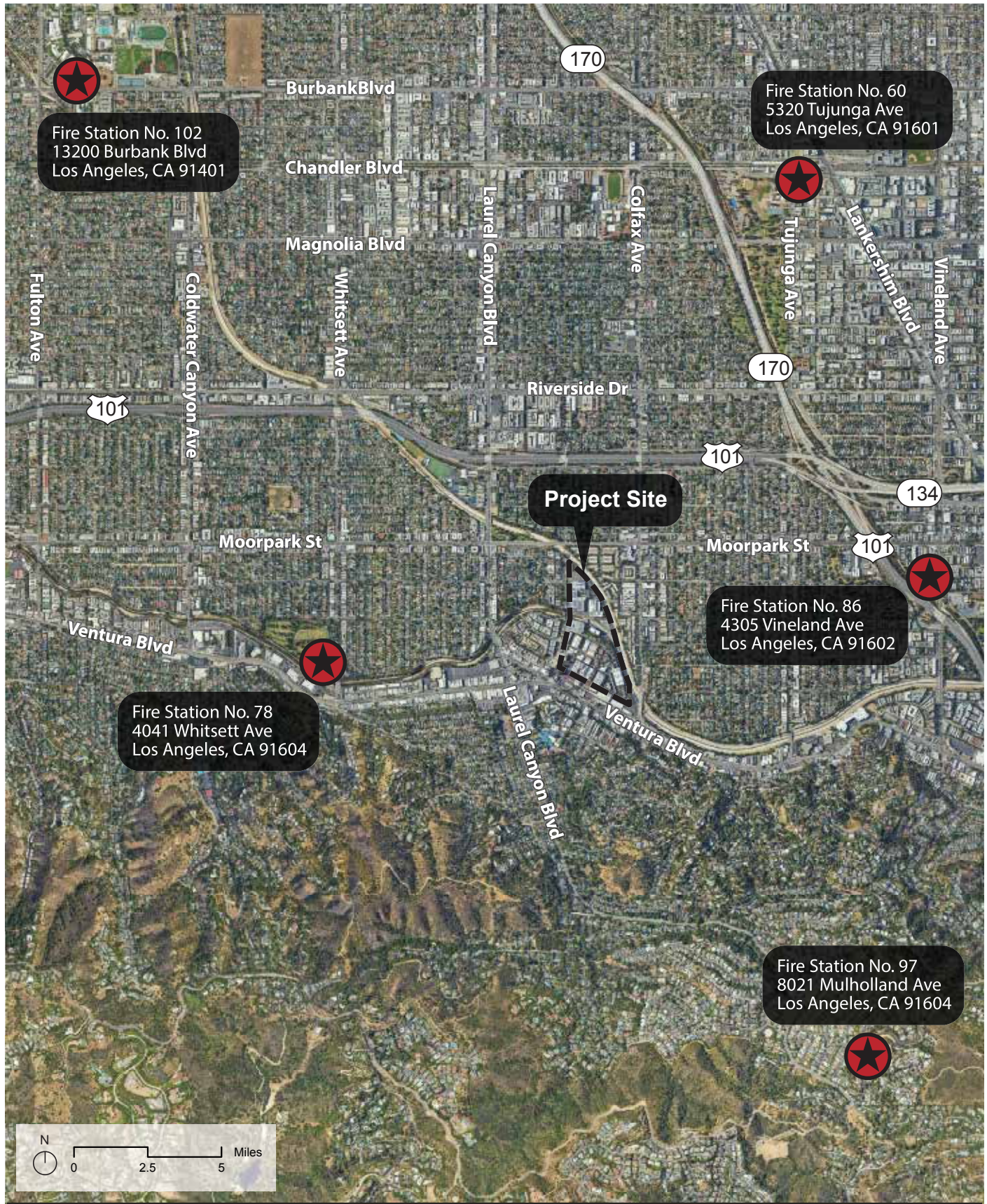


Figure IV.L.1-1
Fire Stations Serving the Project Site

Source: Google Earth Pro, 2024; Eystone Environmental, 2024.

**Table IV.L.1-3
LAFD Stations Located in the Vicinity of the Project Site**

Station No., Location, and Community Served	Distance from Project Site	Equipment/Team	Staffing
Fire Station No. 78 4041 Whitsett Ave. Los Angeles, CA 91604	0.9 miles	<ul style="list-style-type: none"> • Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance 	• 13 staff
Fire Station No. 86 4305 Vineland Ave. Los Angeles, CA 91602	2.1 miles	<ul style="list-style-type: none"> • Assessment Engine • Paramedic Rescue Ambulance 	• 6 staff
Fire Station No. 97 8021 Mulholland Dr. Los Angeles, CA 91604	2.5 miles	<ul style="list-style-type: none"> • Assessment Engine • Paramedic Rescue Ambulance 	• 6 staff
Fire Station No. 60 5320 Tujunga Ave. Los Angeles, CA 91061	2.6 miles	<ul style="list-style-type: none"> • Assessment Light Force • Engine • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Battalion Supervisor 	• 16 staff
Fire Station No. 102 13200 Burbank Blvd. Los Angeles, CA 91401	3.5 miles	<ul style="list-style-type: none"> • Assessment Engine • Paramedic Rescue Ambulance 	• 6 staff
<hr/> <p><i>Source: Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 13, 2024.</i></p>			

13200 Burbank Boulevard, consists of an assessment engine, a paramedic rescue ambulance, and a staff of six.¹⁹

The response times for January 2024 to December 2024, the most recent full year for which data are available, are shown in Table IV.L.1-4 on page IV.L.1-17. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response.²⁰

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit

¹⁹ *Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 13, 2024.*

²⁰ *NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for emergency medical service and fire suppression incidents.*

**Table IV.L.1-4
Average Emergency Medical Service and Structure Fire Response Times**

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 78	7:58	7:53
Fire Station No. 86	7:05	6:50
Fire Station No. 97	9:00	9:30
Fire Station No. 60	7:05	6:38
Fire Station No. 102	7:18	7:16

^a Response times are based on January 2024–December 2024 data.

Source: LAFD: FireStatLA, Station 78 Response Metrics for January–December 2024, www.lafd.org/fsla/stations-map?station=78&year=2024, accessed January 15, 2025; FireStatLA, Station 86 Response Metrics for January–December 2024, www.lafd.org/fsla/stations-map?station=86&year=2024, accessed January 15, 2025; FireStatLA, Station 97 Response Metrics for January–December 2024, www.lafd.org/fsla/stations-map?station=97&year=2024, accessed January 15, 2025; FireStatLA, Station 60 Response Metrics for January–December 2024, www.lafd.org/fsla/stations-map?station=60&year=2024, accessed January 15, 2025; FireStatLA, Station 102 Response Metrics for January–December 2024, www.lafd.org/fsla/stations-map?station=102&year=2024, accessed January 15, 2025.

other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with LADOT, developed a Fire Pre-emption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.²¹ The City has over 205 miles of major arterial routes that are equipped with FPS.²²

According to the LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several, including required fire flow, response distance from existing fire stations, and the LAFD’s judgment for needs in an area, that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies. 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 ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for

²¹ LADOT, *Los Angeles Signal Synchronization Fact Sheet*.

²² LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, *Bulleting No. 133*, October 2008.

additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

With regard to studio and filming activities, such as those that presently occur at the Project Site, LAFD's Film Unit in the Bureau of Fire Prevention and Public Safety handles all fire and life safety oversight for motion picture and television production studios and sound stages, approved production facilities and locations, and commercial digital media production conducted in the City.²³ Filming activities must meet the LAFD Film Unit's Studio/Sound Stage Fire & Life Safety Requirements, and certain special effects, such as pyrotechnics, require a permit.²⁴

(2) Emergency Access and Evacuation

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency access, to the Project Site is provided at five driveways along Radford Avenue, one driveway along Colfax Avenue (also known as the Colfax Gate), and two driveways along the alley just south of the Project Site.

The nearest designated disaster route to the Project Site is Ventura Boulevard, approximately 135 feet south of the Project Site.²⁵ Other designated disaster routes in the vicinity include Laurel Canyon Boulevard approximately 800 feet west of the Project Site and US-101 0.3 miles north of the Project Site.

(3) Fire Water Infrastructure

In addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). As described in the Utility Report, included as Appendix M of this Draft EIR, water service to the Project Site is currently provided via LADWP water lines within streets adjacent to the Project Site. Specifically, as detailed in the Utility Report, there is a distribution water main located in the west side of Radford Avenue, which is 8 inches north of Woodbridge Street and 12 inches south of that point. Additionally, a 26-inch transmission main is located in the east side of Radford Avenue.²⁶

²³ LAFD, *Film Unit*, www.lafd.org/film-unit, accessed January 15, 2025.

²⁴ LAFD Film Unit, *Studio/Sound Stage Fire & Life Safety Requirements*, revised March 2019.

²⁵ City of Los Angeles, *Geohub, Disaster Routes*, <https://geohub.lacity.org/datasets/lacounty::disaster-routes-1/explore?location=34.145360%2C-118.392719%2C15.00>, accessed October 23, 2024.

²⁶ KPFF Consulting Engineers, *Radford Studio Center Project Utility Technical Report: Water, Wastewater, and Energy*, January 2025. Refer to Appendix M of this Draft EIR.

Additionally, according to the Utility Report, there are currently five existing hydrants on Radford Avenue north of Valleyheart Drive (three on the east side and two on the west), and three existing hydrants on the west side of Radford Avenue south of Valleyheart Drive

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or Fire District No. 1.^{27,28} Therefore, the Project Site is not located within a fire hazard area.²⁹

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 if it would:

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., fire), need for new or physically altered governmental facilities, the construction of which could 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 threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G threshold.

The *L.A. CEQA Thresholds Guide* identifies the following factor to evaluate impacts to fire protection:

- 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.

²⁷ City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report for APNs 2368-001-028; 001-029; 001-030; 005-011, January 11, 2024.*

²⁸ *Fire District No. 1 consists of areas identified by the City that are required to meet additional development regulations to mitigate fire hazard-related risks.*

²⁹ Refer to Section VI, *Other CEQA Considerations*, of this Draft EIR for a discussion of wildfire impacts.

b. Methodology

Project impacts regarding fire services are evaluated by the LAFD on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce \ 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 a proposed development 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 a project's effect 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 that project's CEQA document. The ultimate determination of whether a project would result in a significant impact on the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is reasonably foreseeable as a direct or indirect effect of the project. 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 acres and one acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or a Mitigated Negative Declaration (MND). Because there are no current capital improvement plans for the construction or expansion of fire facilities in the Project vicinity, further analysis, including a specific location, would be speculative and beyond the scope of this document.

c. Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.M, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project would implement a Construction Traffic Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (i.e., fire), need for new or physically altered governmental facilities, the construction of which could 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

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in Title 29 CFR, Part 1926, as discussed above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.³⁰ Additionally, in accordance with OSHA provisions, fire suppression equipment (e.g., fire extinguishers) specific to construction activities would be maintained on-site.³¹ As discussed in Section IV.H, Hazards and Hazardous Materials, of this Draft EIR, Project construction would comply with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with applicable regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials, thereby reducing the potential demand on fire protection services at the Project Site during construction.

³⁰ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 15, 2025.

³¹ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 15, 2025.

Construction activities also have the potential to affect the provision of existing LAFD fire protection services by adding construction vehicles to the street network, and by necessitating temporary partial lane closures for installation of required utility and street improvements. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained. In addition, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1, as provided in Section IV.M, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Construction activities would also generate trips associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker trips. Thus, although construction activities would be short-term with varied intensities, Project construction activities could temporarily impact emergency access. However, with implementation of Project Design Feature TR-PDF-1, the majority of construction-related trips, including hauling activities and construction worker trips, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls, such as flag persons, to manage traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of vehicles that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow on adjacent rights-of-way are maintained. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Project construction activities would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. Therefore, impacts on fire protection services during Project construction would be less than significant.

(b) Operation

(i) Facilities and Equipment

Following construction of the Project the Project Site would continue to be served by Fire Station No. 78, which is the designated “first-due” station for the Project, located

approximately 0.9 miles west of the Project Site at 4041 Whitsett Avenue. As provided by the LAFD and summarized in Table IV.L.1-1 on page IV.L.1-7, Fire Station No. 78 is equipped with an assessment light force,³² a paramedic rescue ambulance, a BLS rescue ambulance, and a staff of 13. As further provided by the LAFD in their correspondence, based on the LAMC criteria regarding response distance³³ and fire flow requirements, the first-due engine company should be located within 0.75-miles of the Project Site and the first-due truck company should be located within one mile of the Project Site. Based on the response distances from existing fire stations and the type of equipment available at Fire Station No. 78, the LAFD in their correspondence concludes that fire protection would be considered inadequate.³⁴ Therefore, as stipulated in LAMC Sections 57.507.3.3 and 57.512.2, the Project would be required to include automatic fire sprinkler systems in all structures in addition to the fire protection features listed in LAFD's inter-departmental correspondence regarding the Project (see Exhibit 1 of the Utility Report included as Appendix M of this Draft EIR). Although the Project would be located outside the LAFD-required response distance for a fire station with an engine company, LAFD concludes in its correspondence that inclusion of the following recommendations, along with any additional recommendations made during later reviews of the Project will reduce the impacts to an acceptable level. The recommendations identified by the LAFD include, but are not limited to, the following:

- Requiring clear and unobstructed access for LAFD during demolition;
- Requiring access for LAFD apparatus and personnel to and into all structures;
- Placing approved building identification on new and existing buildings in a position that is plainly legible and visible from the street or road fronting the property
- Installation of one or more Knox Boxes (rapid entry system);
- Prohibiting the construction of a building or portion of a building to be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane;
- Prohibiting the construction of a public or private roadway in the proposed development from exceeding 10 percent in grade;
- Requiring additional vehicular access where buildings exceed 28 feet in height;

³² *The LAFD operates a number of Aerial Ladder Fire Engines, called "Truck Companies." However, these apparatus are rarely assigned to run on their own. When a Truck Company runs with one engine, it is referred to as a Light Force. Source: LAFD, Apparatus, <https://lafd.org/about/about-lafd/apparatus>, accessed September 19, 2024.*

³³ *LAMC Section 57.512.1*

³⁴ *The Project Site would be located outside of the required 0.75-mile response distance for a fire station with an engine company, and it would be located within the required 1.0-mile response distance from a fire station with a truck company.*

- Requiring site plans to include all overhead utility lines adjacent to the site;
- Requiring overhead clearance to be at least 14 feet where access for a given development requires accommodation of Fire Department apparatus;
- Requiring private development to conform to the standard street dimensions shown on Department of Public Works Standard Plan S-470-0.
- Requiring the use of standard cut-corners on all turns

Refer to Exhibit 1 of the Utility Report included as Appendix M of this Draft EIR for a complete list of recommendations provided by the LAFD.

As discussed in Section II, Project Description, of this Draft EIR, the Project would establish the Radford Studio Center Specific Plan (Specific Plan) to allow for the continuation of an existing studio use and the modernization and expansion of media production facilities within the approximately 55-acre Project Site. The Specific Plan would establish standards to regulate land use, massing, design, and development, and permit up to 2,200,000 square feet of sound stage, production support, production office, general office, and retail uses within the Project Site upon build out, as well as associated ingress/egress, circulation, parking, landscaping, and open space improvements. Specifically, the Specific Plan would permit up to 1,667,010 square feet of new development, the retention of 532,990 square feet of existing uses,³⁵ and the demolition of up to 646,120 square feet of existing uses. In addition, the Radford Studio Center Sign District (Sign District) would also be established to permit studio-specific on-site signage.

As such, the Project would increase the demand for LAFD fire protection and emergency medical services. The proposed uses would be expected to generate a range of fire service calls similar to other studio uses, potentially including electrical fires, car fires, etc. However, the Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. Additionally, filming activities would continue to be subject to the LAFD's Studio/Sound Stage Fire & Life Safety Requirements, and special effects such as pyrotechnics would continue to be permitted through LAFD's Film Unit. Accordingly, appropriate safety protocols and equipment would be in place, and the types of fires that could potentially occur within the

³⁵ *Per the proposed Radford Studio Center Specific Plan, floor area shall be defined in accordance with Los Angeles Municipal Code (LAMC) Section 12.03, with the following exceptions: areas related to the Mobility Hub(s); basecamp; outdoor eating areas (covered or uncovered); trellis and shade structures; covered walkways and storage areas; and all temporary uses (e.g., sets/façades) shall not be counted towards floor area. Per the Radford Studio Center Specific Plan definition, the maximum of 2,200,000 square feet of total floor area within the Project Site upon buildout of the Project is equivalent to approximately 2,345,000 square feet based on the LAMC definition.*

Project Site would be adequately suppressed with the fire equipment provided on-site combined with those available at the fire stations nearest the Project Site. Refer to Section IV.H, Hazards and Hazardous Materials, of this Draft EIR for further discussion on the use, handling, storage, and transport of any potentially hazardous materials.

Per LAMC Section 57.4705.4, because the Project includes high-rise buildings as defined by LAFD,³⁶ the Project would be required to provide an emergency helicopter landing facility (EHLF) or implement one of two alternate options to an EHLF with approval of the Fire Marshal. In particular, a proposed development could include (1) provision of a helicopter tactical landing area or (2) additional life safety elements, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways. The Project would not include an EHLF, but would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage, and management of hazardous materials, alarms, and communications systems, etc., including as set forth in the written correspondence from LAFD included as Exhibit 1 of the Utility Report in Appendix M of this Draft EIR. Compliance with applicable Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118 prior to the issuance of a building permit.

Compliance with applicable regulatory requirements and LAFD's recommendations, including installation of automatic fire sprinkler systems and LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that reduce the demand on LAFD facilities and equipment from the Project are provided. As such, compliance with LAFD procedures and Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and, therefore, reduce the need for a new fire station or the expansion, consolidation, or relocation of an existing fire station. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, as listed in Subsection 2.a.(3) above, the City and LAFD would continue to monitor the overall demand for existing and projected fire facilities (Objective 9.16 in the Framework Element, Policy 2.1.6 of the Safety Element, and Policy 9-1.1 of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan) and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 in the Framework Element). Given

³⁶ *A high-rise building is a building of any type of construction having floors (as measured from the top of the floor surface) used for human occupancy located more than 75 feet above the lowest floor level having building access. Source: LAFD, High Rise Retrofit Ordinances #163836 and #165319, https://lafd.org/fire-prevention/fire-development-services/high-rise-retrofit-ordinances-163836-and-165319#:~:text=Definition%3A%20*%20A%20high%E2%80%94rise,BUILDING%20REQUIREMENTS%20AND%20INFORMATION, accessed January 15, 2025.*

these procedures and policy directives, as well as LAFD's continued evaluation of existing fire facilities, Project impacts with regard to LAFD facilities and equipment would be less than significant. In addition, as discussed above, consistent with *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833 and the requirements of the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a(2) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Furthermore, if new facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA, and physical environmental impacts would be addressed, as necessary. **Therefore, given these procedures and policy directives, Project impacts with regard to LAFD facilities and equipment would be less than significant.**

(ii) Emergency Access

As discussed in Section II, Project Description, the Project includes new and restored vehicular and pedestrian access points. As discussed in detail in Section IV.M, Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. Furthermore, the Radford Bridge would improve emergency access in the Project vicinity because emergency vehicles could use the bridge in the event of an emergency. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. **Therefore, impacts with regard to emergency access would be less than significant.**

(iii) Fire Flow

As discussed in the Utility Report included as Appendix M of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Exhibit 1 of the Utility Report, the required fire water flow for the Project Site has been set at 6,000 to 9,000 gallons per minute (gpm) from four to six hydrants flowing simultaneously.

As discussed above, there are currently five existing hydrants on Radford Avenue north of Valleyheart Drive (three on the east side and two on the west), and three existing hydrants on the west side of Radford Avenue south of Valleyheart Drive. Based on correspondence with LADWP, which is also included in Exhibit 1 of the Utility Report, the following upgrades may be required to meet the top end range of 9,000 gpm:

- Upgrade approximately 900 linear feet of water main on Radford Avenue, north of Valleyheart Drive North from an 8-inch to 12-inch pipe.
- Upgrade approximately 1,300 linear feet of water main on Valleyheart Drive South from a 6-inch to 8-inch pipe from Radford Avenue to Laurel Canyon Boulevard.
- Install four new hydrants. Specifically, one new hydrant on Radford Avenue north of Valleyheart Drive for a total of six, and up to three new hydrants on Radford Avenue south of Valleyheart Drive for a total of six.

The above improvements analyzed herein represent the most conservative scenario. Other less impactful options may be considered to demonstrate compliance with LAFD requirements. Additionally, according to the NFPA, the installation of an approved sprinkler system can reduce the required fire flow, thereby reducing the demand on nearby public hydrants. As discussed above, in accordance with LAMC Section 57.512.1, the Project would be required to include automatic fire sprinkler systems in all structures, which would reduce the demand on nearby public hydrants. **Therefore, adequate fire flow to the Project Site would be provided, and impacts with regard to fire flow would be less than significant.**

(iv) Conclusion

Based on the analysis above and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2), it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service levels; adequate services would be provided by a local jurisdiction; and the Project would not inhibit LAFD emergency response. Additionally, with implementation of the recommendations set forth in the written correspondence from the LAFD included as Exhibit 1 of the Utility Report in Appendix M of this Draft EIR, potential impacts to fire protection services would be addressed.

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

(2) Mitigation Measures

Project-level impacts related to fire protection would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to fire protection 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. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2028, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2045. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and Mitigation Monitoring Program (MMP) throughout the term of the Development Agreement. The Specific Plan and MMP would continue to regulate development of the Project Site and provide for the implementation of all applicable project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, the Project's fire protection requirements would not change with a later buildout date, as such requirements are based on full occupancy and operation of the Project regardless of when they occur. While calls for service and surrounding traffic levels (and therefore response times) could potentially increase in future years due to anticipated growth in the surrounding area, as previously discussed, the City is legally obligated to provide adequate fire protection and emergency medical services in accordance with State law. If the number of incidents in a given area increases, it is LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Accordingly, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

The cumulative impact analysis for fire protection services is based on the service areas of Fire Station Nos. 78, 86, 97, 60, and 102. The Project, in conjunction with growth forecasted in the City through 2028 (i.e., the Project's anticipated buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2028 includes specific known development projects, as well as general ambient

growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, there are 13 related projects located in the vicinity of the Project Site. Some of the related projects may not be built out by 2028, may never be built, or may be approved and built at reduced densities. Nevertheless, to provide a conservative analysis, the future baseline forecast assumes that Related Project Nos. 1 through 13 are fully built out by 2028 and are served by the same fire stations as the Project.

As stated in the written correspondence from LAFD included as Exhibit 1 of the Utility Report in Appendix M of this Draft EIR, development of the Project along with other approved and planned projects in the immediate area could have a cumulative impact on fire services resulting in the need for increased staffing, additional fire protection facilities, or the relocation of existing fire protection facilities if the Project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, as previously discussed and as set forth in the City's General Plan Framework Element, the LAFD continually evaluates fire station placement and overall LAFD services for the entire City. In addition, as with the Project, the related projects, and other future development projects in the surrounding area would be required to comply with applicable regulatory requirements related to fire protection including the standard construction permitting process, which includes review by LAFD (or the respective fire department) for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP (or the respective water supplier) to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Each related project and other future development projects would also be reviewed by LAFD (or the respective fire department) to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection and emergency medical services.

Like the Project, the related projects and other future development projects in the City 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. Cumulative increases in the demand for fire protection and emergency medical services due to the related projects and other future development projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies would be allocated according to the priorities at the time. Any requirement for a new fire station or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD will 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, which may become necessary to achieve the required level of service.

Consistent with the California Constitution Article XIII, Section 35(a)(2), discussed in Subsection 2.a.(2) above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatus and possibly station expansions or new station construction, will be identified and allocated according to the priorities at the time. At this time, LAFD has not proposed any new stations or identified any specific station improvements in the Project area either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, 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 acres and one acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or an MND and would not be expected to result in significant impacts. Therefore, development of a station at this scale is not anticipated to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

Based on the above, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, cumulative impacts on fire protection services would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to fire protection would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to fire protection 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.