IV. Environmental Impact Analysis
I.2 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR provides an analysis of the proposed Project's potential impacts on fire protection and emergency medical services. The analysis includes a description of the existing fire protection and emergency medical services within the Project area and addresses service capacity, fire flow, emergency response times, emergency access, and fire safety equipment. This analysis is based, in part, on information provided by the Los Angeles County Fire Department (LACFD), included in Appendix G of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) National Regulations

(a) National Fire Protection Association

The National Fire Protection Association (NFPA) Standard 1710 calls for response time targets of 4 minutes or less for the arrival of the first arriving engine company at a fire suppression incident and 8 minutes or less for the deployment of a full crew.[1] NFPA 1710 also establishes emergency medical services (EMS) response times of 4 minutes or less for a first responder and 8 minutes or less for a full company. Based on this guidance and local conditions, the LACFD has established its own response time standards, discussed below.

(b) Occupational Safety and Health Administration

The federal and California Occupational Safety and Health Administrations 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. The fire-related requirements of the Occupational

[1] *National Fire Protection Association, NFPA 1710 Implementation Guide, 2002.*

Safety and Health Administration (OSHA) are specifically contained in Subpart F, Fire Protection and Prevention. 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 operate the on-site fire-fighting equipment, and keeping storage sites free from accumulation of unnecessary combustible materials.

(2) State Regulations

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations, Title 24) is a compilation of building standards, including fire safety standards for new buildings, which are provided in the California Fire Code (California Code of Regulations, Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2016 edition of the California Building Code became effective on January 1, 2017.[2] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2016 California Fire Code also went into effect on January 1, 2017.[3] 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 West Hollywood Municipal Code (WHMC) with local amendments, as discussed below.

(b) Standardized Emergency Management System Regulations

The Standardized Emergency Management System (SEMS) regulations are described in CCR, Title 19, Division 2, Chapter 1. The California Emergency Services Act 2015 Edition (ESA) requires the SEMS to manage multiagency and multi-jurisdictional responses to emergencies in California and coordinate among all levels of government and

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[2] *California Building Code, Title 24, Part 2.*

[3] *California Fire Code, Title 24, Part 9.*

affected agencies.[4] The system unifies all elements of California's emergency management community into a single integrated system and standardizes key elements. The SEMS establishes organizational levels for managing emergencies, standardized emergency management methods, and standardized training for responders and managers. When fully activated, the SEMS activities occur at five levels: field response, local government, operational areas (Countywide), Mutual Aid Regions, and state level.

As required by state law, both the County of Los Angeles and the City of West Hollywood (City) have adopted the SEMS.[5] Per Section 2.80.110 of the WHMC, the West Hollywood Emergency Plan is in compliance with the SEMS. The Public Safety Administrator of the City, with assistance from designated staff, is responsible for updating and maintaining the City's Emergency Plan and keeping it in compliance with the SEMS.

(3) County of Los Angeles

(a) Los Angeles County Fire Code and Building Code

The Los Angeles County Fire Code (County Fire Code; County Code Title 32) and Building Code (County Building Code; County Code Title 26) establish standards for the construction, design, and distribution of fire suppression facilities. The requirements address such issues as fire flow, minimum distance to fire stations, and public and private fire hydrants. In addition, fire prevention issues addressed in the County Fire Code include provisions for access roads, adequate road widths, and clearance of brush around structures located in hillside areas that are considered wildland fire risk areas. Furthermore, the County Water Code (County Code, Title 20, Division 1) specifies that water storage facilities be placed in a manner that ensures gravity emergency fire flow in the event power lines are damaged. As discussed below, the WHMC incorporates the County Fire Code by reference.

With respect to fire flows, water pressure, and hydrant spacing, the County Fire Code requirements vary based on land use, building size, density, and terrain. Accordingly, the LACFD's Land Development Unit has set requirements for the proposed Project as follows:

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[4] *Governor's Office of Emergency Services, Standardized Emergency Management System, www.caloes.ca.gov/cal-oes-divisions/planning-preparedness/standardized-emergency-management-system, accessed August 18, 2016.*

[5] *County of Los Angeles, Los Angeles County Operational Area Emergency Response Plan, Standardized Emergency Management System (SEMS).*

- The maximum fire flow for the proposed Project is up to 8,000 gallons per minute (gpm) at 20 pounds per square inch (psi) residual pressure for a four-hour duration.

- The final fire flow requirement will be based on the size of building(s), its relationship to other structures, property lines, and the type(s) of construction.

- A reduction in required fire flow may be allowed if the structure(s) is equipped with an approved automatic fire sprinkler system; however, the resulting fire flow cannot be less than 2,000 gpm at 20 psi for a two-hour duration.

- The required fire hydrant spacing is 300 feet.[6]

Based on the County Fire Code requirements, the proposed Project also must comply with applicable regulations related to specific fire and life safety requirements during construction, ingress/egress including specifications for streets and driveways, all weather access, access road maintenance, maximum allowable grades, turning radii, building access, fire sprinkler systems, and fire hydrant installations. Additionally, all access devices/gates shall meet requirements related to width, positioning, and type. Compliance with applicable requirements is determined through the LACFD's fire exhibit approval process.

(b) County of Los Angeles Fire Department

The LACFD provides structural fire protection and rescue services to unincorporated portions of the County and contract cities, including the City.[7] The mission of the LACFD is to protect lives, the environment, and property by providing prompt, skillful, and cost-effective fire protection and life safety services.

The LACFD consists of the Fire Prevention Division, Health Hazardous Materials Division, and the Lifeguard Division.[8] The Fire Prevention Division focuses on educating the community about the benefits of proper safety practices and identifying and eliminating all types of hazardous conditions, which pose a threat to life, the environment and property. The Fire Prevention Division includes the Regional Units, which are responsible for

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[6] *Written correspondence, Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 16, 2016.*

[7] *City of West Hollywood, Public Safety, Emergency Services/Disaster Preparedness, www.weho.org/services/public-safety/emergency-services-disaster-preparedness, accessed August 18, 2016.*

[8] *County of Los Angeles Fire Department, Our Services, www.fire.lacounty.gov/, accessed August 18, 2016.*

conducting field inspections of new construction, annual business inspections, inspection of fire extinguishing systems and minor plan checks for buildings.

In addition to County Fire Code and Building Code requirements, the LACFD has established optimal response time standards to adequately meet the fire protection needs of the areas it protects. As of 2014, the standards for response times are:[9]

- 5 minutes or less for urban areas;
- 8 minutes or less for suburban areas; and
- 12 minutes or less for rural areas.

(4) City of West Hollywood

(a) West Hollywood General Plan 2035

The West Hollywood General Plan 2035 (General Plan) serves as a guiding document for the development of the City through 2035. The General Plan provides goals, policies, and guidelines to inform the management of physical, social, and economic resources in the City as well as long term strategies to address the unique needs and characteristics of the City. It also encompasses issues related to infrastructure, governance, land use, circulation, housing, conservation, open space, noise, social services, arts and culture, and safety. The Safety and Noise Element of the General Plan describes specific goals and policies related to fire protection and public safety. Policies relevant to the proposed Project are as follows:

- SN-6.1: Provide sufficient law enforcement, fire protection, and emergency medical services to meet the needs of a changing population.
- SN-6.2: Cooperate and collaborate with neighboring jurisdictions, social services, and internal departments to maximize public safety and emergency services.
- SN-6.3: Continue to support the County's existing mutual aid and automatic aid agreements for additional fire and police resources needed during an emergency, as feasible.
- SN-7.1: As appropriate, utilize urban design features to enhance public safety, to facilitate "eyes on the street" and to create defensible space in project design.

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[9] *County of Los Angeles General Plan Update Draft EIR, Environmental Analysis, Public Services, Fire Protection and Emergency Services, June 2014.*

As appropriate, utilize best practices in lighting, vegetation, active public spaces, and visual transparency in the urban landscape to achieve improved public safety in project design.

- SN-7.3: Provided that it serves the best interests of the community, continue to contract with Los Angeles County for the provision of police services and remain part of the Consolidated Fire Protection District of the County of Los Angeles for fire/emergency services, and annually review the services regarding the responsiveness to community needs, effectiveness, and efficient resource allocation.

- SN-7.4: Promote community-based programs in fire safety and emergency preparedness, including neighborhood-level programs and programs with businesses.

- SN-7.5: As feasible, require new development to incorporate appropriate safety monitoring features.

- SN-8.1: Coordinate the provision of law enforcement and fire protection/ emergency medical services with all public safety service providers monitoring their adequacy and responsiveness to community needs.

(b) West Hollywood Municipal Code

The WHMC includes provisions for new construction projects within the City. It contains, by reference, Title 32, Fire Code, of the Los Angeles County Code, which constitutes an amended version of the California Fire Code, 2016 Edition of the California Building Code building construction standards. Title 14, Fire Protection (also known as the Fire Code), of the WHMC 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.

The WHMC also establishes standards for the construction, design, and distribution of fire suppression facilities. The requirements address such issues as fire flow, minimum distance to fire stations, and public and private fire hydrants. In addition, fire prevention issues addressed in the West Hollywood Fire Code include provisions for access roads, adequate road widths, and clearance of brush around structures located in hillside areas that are considered wildland fire risk areas.

Pursuant to Section 14.08.010 of WHMC, occupants of all high rise buildings should be instructed annually on procedures to be followed in the event of fire, earthquake, or other emergency. Documentation of occupant instruction shall be maintained by the fire

safety director of each high-rise building, and shall be available for inspection by the Fire Marshal. Instruction for all new occupants shall occur within 14 days of their assuming occupancy of the building. In addition to the above general instruction, the owner(s) of each high-rise structure in the City shall be responsible for having all building staff personnel, including at least one representative from each independent tenant, receive two hours of training on usage of portable extinguishers, two hours of training on high-rise fire survival strategies, and two hours of training for earthquake preparedness.

b. Existing Conditions

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

The City contracts with the LACFD for fire protection services. The LACFD provides fire prevention, fire protection, and emergency services to approximately 4.0 million residents in 58 incorporated cities and all of the unincorporated areas of Los Angeles County.[10] The LACFD currently consists of 9 divisions, 22 battalions, 171 fire stations and 9 fire suppression camps. In addition, the LACFD includes 171 fire stations, 230 fire engines (including 500 series), 5 light forces, 25 quints,[11] 94 paramedic squads, 35 patrols, 11 wildland fire suppression camps, 8 bulldozers, 7 helicopters, 3 Urban Search and Rescue (USAR) teams, 1 USAR Task Force, 97 Lifeguards vehicles and rescue boats, 23 Prevention Offices, 12 Forestry Units and numerous other response vehicles and facilities.[12]

The Project Site is located within Battalion 1 of the LACFD. Battalion 1 includes a total of six fire stations, of which Station No. 7 and Station No. 8 are located within the City. The two stations within the City are staffed by 19 Firefighters and a Battalion Chief who work 24 hour shifts. As shown in Figure IV.I.2-1 on page IV.I.2-8, there are two fire stations located within a 2-mile radius of the Project Site. The closest station to the Project Site is Fire Station No. 7, which is the designated "first in" station.[13] It is located at 861 North San Vicente Boulevard, approximately 0.2 mile southeast of the Project Site. Fire Station No. 8, which serves as a secondary fire station to the Project Site, is located at 7643 Santa Monica Boulevard, approximately 1.7 miles east of the Project Site.

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[10] *County of Los Angeles Fire Department, County of Los Angeles Fire Department 2014 Strategic Fire Plan, June 2014.*

[11] *A quint is a combination fire engine and ladder truck.*

[12] *County of Los Angeles Fire Department, County of Los Angeles Fire Department 2014 Strategic Fire Plan, June 2014.*

[13] *Telephone Conversation with Mike Urbano, Captain, Fire Station 8, County of Los Angeles Fire Department, September 16, 2016.*

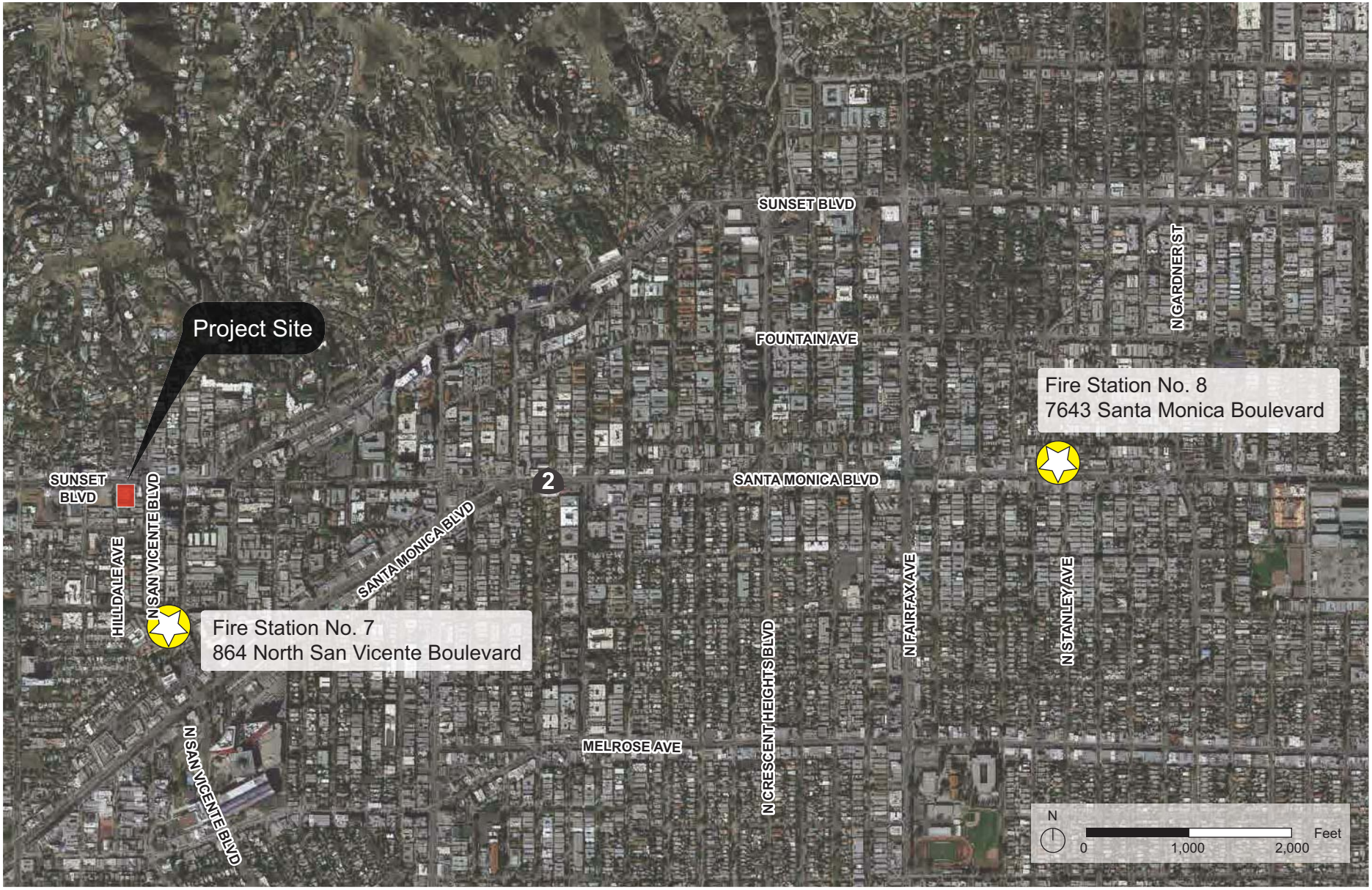

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Figure IV.I.2-1
Fire Stations in the Vicinity of the Project Site

Source: Google Earth, 2016; Eyestone Environmental, 2016.

As shown in Table IV.I.2-1 on page IV.I.2-10, Fire Station No. 7 consists of one fire captain, one firefighter specialist, two firefighter paramedics and a 2-person paramedic squad, and Fire Station No. 8 consists of one fire captain, one firefighter specialist, one firefighter paramedic, one firefighter, a 2-person paramedic squad, and a 7-person light force.[14] A "light force" consists of an engine and a truck responding as a unit.

According to the LACFD, with Fire Station No. 7 less than 0.5 mile from the Project Site, a response time of two to three minutes would be anticipated and well within the LACFD's response time standard of five minutes or less in urban areas.[15]

(2) Emergency Access

The area surrounding the Project Site includes a mature street system consisting of freeways, primary and secondary arterials, and collector and local streets which provide regional, sub-regional, and local access and circulation within the vicinity of the Project Site. 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. As discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, under existing conditions, five of the eight study intersections currently operate at LOS D or better during both the A.M. and P.M. peak hours. The remaining three intersections are currently operating at LOS F during both the A.M. and P.M. peak hours.

As discussed in greater detail in Section IV.J, Traffic, Access, and Parking of the Draft EIR, primary access to the Project Site would be accessible from the vehicle entrance on Hilldale Avenue. Emergency vehicles would be allowed to park temporarily along the curbs on Sunset Boulevard and Hilldale Avenue. The proposed Project would also be required to comply with all applicable code and ordinance requirements for fire and emergency vehicle access and would be subject to review and approval by the City's Building and Safety Division and the LACFD to ensure that any concerns about emergency access are adequately addressed.

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[14] *Written correspondence, Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 16, 2016.*

[15] *Written correspondence, Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 16, 2016.*

Table IV.I.2-1
County of Los Angeles Fire Department Fire Stations Located in the Project Vicinity

Station No., Location, and Community Served	Distance from Project Site	Staffing
Fire Station No. 7 864 North San Vicente Boulevard, West Hollywood	0.2 mile	• 1 Fire Captain • 1 Firefighter Specialist • 2 Firefighter Paramedics • 2-Person Paramedic Squad
Fire Station No. 8 7643 Santa Monica Boulevard, West Hollywood	1.7 miles	• 1 Fire Captain • 1 Firefighter Specialist • 1 Firefighter Paramedic • 1 Firefighter • 2-Person Paramedic Squad • 7-Person Light Force

Source: Written correspondence, Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 16, 2016.

(3) Fire Water Infrastructure

As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in addition to providing domestic water service, the City of Beverly Hills also provides water for firefighting services for the portion of the City that includes the Project Site. There is an existing 6-inch water line in Hilldale Avenue west of the Project Site and an existing 8-inch water line in Sunset Boulevard north of the Project Site. These lines feed the two fire hydrants serving the Project Site: Fire Hydrant 9002 located immediately in front of the Project Site on Sunset Boulevard and Fire Hydrant 5039 located southwest of the Project Site on Hilldale Avenue.

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, based on Figure 10-1 in the Safety and Noise Element of the General Plan, the Project Site is not located within a City-designated Very High, High, or Moderate Fire Hazard Severity Zone.[16]

[16] *City of West Hollywood, West Hollywood General Plan 2035, Safety and Noise Element, September 6, 2011.*

(5) Project Site

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a 19,670 square-foot, two-story commercial building with surface parking and two levels and a partial level of subterranean parking. This commercial building contains retail and office uses along with a gym/fitness center and generates a small demand for fire protection services from the LACFD.

3. Project Impacts

a. Methodology

Fire service needs are determined based on the size of the service population and the geographic area served, the number and types of calls for service, and the characteristics of a project and its surrounding community. The LACFD evaluates impacts regarding fire services on a project-by-project basis, taking into account a project's land use(s), fire protection needs, design features that would reduce or increase the demand for fire protection services, and whether the project site meets the recommended response time requirements. Additionally, the LACFD considers a project's fire flow requirements, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials on-site. The determination of significance relative to impacts on fire protection and emergency medical services is based on the evaluation of existing fire protection and emergency medical services available to service the Project Site, and any potential expected future changes to existing levels of service. Consultation with the LACFD is conducted to accurately determine a project's effect on fire protection and emergency medical services.

b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a sample question that addresses impacts with regard to fire protection service. Therefore, in the context of this question from the CEQA Guidelines, a significant impact related to fire protection would occur if the proposed Project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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.

c. Project Design Features

Project Design Feature I.2-1: All areas of the building will be covered by a hydraulically designed automatic sprinkler system. This system will include a sprinkler water storage tank located in the parking structure and a pump. The system will be designed in accordance with National Fire Protection Association (NFPA) 13, which covers the design and installation of fire sprinkler systems, and applicable building and fire codes.

Additionally, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, pursuant to Project Design Feature J-1, the Applicant would implement a Construction Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

(1) 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 has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. 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.[17] Additionally, in accordance with the provisions of the OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[18] Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to

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[17] *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.*

[18] *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.*

expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction of the proposed Project could also potentially impact the provision of LACFD services in the vicinity of the proposed Project as a result of construction impacts to the surrounding roadways. Specifically, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction of the proposed Project would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, such activities could temporarily increase response times for emergency vehicles along Sunset Boulevard and other main connectors due to travel time delays caused by traffic during the proposed Project's construction phase. However, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, construction-related traffic, including hauling activities and construction worker trips, would be scheduled so as to occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature J-1, as identified in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Hilldale Avenue would continue to be blocked off to thru-traffic immediately south of the proposed Project's driveway; however, if necessary, emergency vehicles have the ability to move the existing bollards and chain to access Hilldale Avenue south of the Project Site. The proposed Project would also employ temporary traffic controls, such as flag persons, to control 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 traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. As concluded in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, the proposed Project's construction activity and worker trips would not result in significant impacts during the excavation, grading, and building phases of construction. Thus, construction-related traffic generated by the proposed Project would not significantly impact emergency vehicle response times within the vicinity of the proposed Project as the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic as allowed by Section 21806 of the California Vehicle Code.

Based on the above, construction of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities 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 construction of the proposed Project would be less than significant, and no mitigation measures are required.

(2) Operation

The analysis of the proposed Project's potential operational impacts on LACFD services addresses potential impacts associated with LACFD resources and equipment, response distances, access, response times, and the ability of the fire water infrastructure system to provide the necessary fire flows. The proposed Project would not include residential development that would generate a new residential population in the applicable Fire Station service area. The proposed Project would, however, generate additional numbers of visitors, guests, and employees at the Project Site. As such, increased intensity of land uses on the Project Site would be expected to increase the frequency of fire protection services and emergency response calls.

(a) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 7, the "first-in" station for the Project Site, located approximately 0.2 mile southeast of the Project Site. As shown in Table IV.I.2-1 on page IV.I.2-10, Fire Station No. 7 is staffed with one fire captain, one firefighter specialist, two firefighter paramedics and a two-person paramedic squad. In addition, Fire Station No. 8, located approximately 1.7 miles east of the Project Site, would continue to be available to serve the Project Site in the event of an emergency. Fire Station No. 8 houses one fire captain, one firefighter specialist, one firefighter paramedic, one firefighter, and a seven-person light force. It is not expected that current stations and staff levels would be changed in the future; however, LACFD will continue to evaluate its service needs on an annual basis and expand as necessary to keep pace with projected growth, including growth associated with the proposed Project. Furthermore, the proposed Project would be located within close proximity of Fire Station No. 7, which was built in 2001. As of September 2016, there are no plans to construct new or expand existing fire stations near the Project Site.[19]

In addition, the proposed Project would implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire

[19] *Written correspondence, Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 16, 2016.*

flow, storage and management of hazardous materials, alarm and communications systems, etc. The proposed Project would also implement applicable design features regarding high-rise structures in accordance with the City's Fire Code. Furthermore, as provided in Project Design Feature I.2-1, above, the proposed Project would include the installation of automatic fire sprinklers throughout the proposed building, which would reduce the demand placed on the LACFD.

The Applicant would also submit an emergency response plan for LACFD approval. Emergency access also would be maintained on-site in accordance with Fire Code requirements. Compliance with the applicable regulatory requirements listed above would ensure that adequate fire prevention features would be provided that would reduce the demand on LACFD facilities and equipment. In addition, in accordance with the fire protection-related goals, objectives, and polices set forth in the Safety and Noise Element of the City's General Plan, the City, along with LACFD, would continue to monitor the demand for existing and projected fire facilities and coordinate the development of new fire facilities to be phased with growth.

(b) Response Distance, Emergency Access, and Response Times

As previously discussed, the proposed Project would increase the intensity of land uses and introduce new visitors, guests and employees to the Project Site. As such, a typical range of fire service calls would be expected to increase, including garbage bin fires, car fires, electrical fires, etc. These types of fires would be adequately suppressed with the types of fire equipment found at the County fire stations. The proposed Project would not include any unique or especially hazardous uses, such as industrial facilities, that utilize 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.

The adequacy of fire protection for a given area is typically based on response times from existing fire stations and required fire flows, as well as the LACFD's judgment for needs in the area. Fire Station No. 7, which would serve as the first-in fire station to the Project Site, and Fire Station No. 8 would serve as the second-in fire station. As provided by the LACFD, due to the Project Site's proximity to Fire Station No. 7, response times to the Project Site are expected to be between two and three minutes and well within the LACFD's guidelines for response times, which are set forth above.[20] Therefore, the proposed Project would not require new or physically altered LACFD facilities.

[20] *Written correspondence, Kevin T. Johnson, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 16, 2016.*

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided from Hilldale Avenue via one driveway similar to existing conditions. In addition, as discussed in Section IV.J, Traffic, Access, and Parking of the Draft EIR, emergency vehicles would be allowed to park temporarily along the curbs on Sunset Boulevard and Hilldale Avenue. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, traffic generated by the proposed Project would not result in significant impacts to Project area intersections, including intersections along the County-designated disaster route on Santa Monica Boulevard. In addition, the proposed Project's driveway and internal circulation would be designed to incorporate all applicable County Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. The proposed Project also would not include the installation of barriers that could impede emergency vehicle access. Hilldale Avenue would continue to be blocked off to thru-traffic immediately south of the proposed Project's driveway; however, if necessary, emergency vehicles have the ability to move the existing bollards and chain to access Hilldale Avenue south of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained. The increase in traffic generated by the proposed Project would also not significantly impact emergency vehicle response times to the Project Site and surrounding uses, including along County-designated disaster routes, since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, Project-related traffic is not anticipated to impair the LACFD from responding to emergencies at the Project Site or the surrounding area.

Overall, impacts with regard to response distance, emergency access, and response times would be less than significant.

(c) Fire Flow

As described in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by the City of Beverly Hills. The proposed Project would be required to meet LACFD fire flow requirements. As identified in Project Design Feature I.2-1, all areas of the building would be fully covered by an automatic sprinkler system. Per Table B105.1 of the Los Angeles County Fire Code, with the allowable 50-percent reduction in required flow for fully sprinklered buildings, the fire flow requirement for the proposed Project would be 4,000 gpm. Flow testing was performed by the City of Beverly

Hills on the fire hydrants closest to the Project Site.[21] Fire hydrant 9002, located at the corner of Sunset Boulevard and Hilldale Avenue was found to have an available water flow of 4,638 gpm at 20 pounds per square inch of pressure (psi). Fire hydrant 5039 located on Hilldale Avenue south of the Project Site was found to have an available water flow of 5,733 gpm at 20 psi. Therefore, the proposed Project's fire flow demands could be met by existing infrastructure.

Sunset Boulevard and Hilldale Avenue would serve as fire lanes for the proposed Project and are within 150 feet of each corner of the building. Fire Hydrant 9002 at the intersection of Sunset Boulevard and Hilldale Avenue is within 150 feet of the access point along each side of the building. Therefore, fire access to the proposed Project is available with the existing infrastructure.

(d) Conclusion

Based on the analysis above, operation of the proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, or result in substantial adverse physical impacts associated with the provision of physically altered facilities in order to maintain service. In addition, the proposed Project would generate revenues to the City's General Fund, which would continue to support the funding of fire protection services, fire prevention, and public safety outreach performed by the LACFD.[22] These new revenues, as well as the project design feature identified above and the proposed Project's adherence to building and fire regulations would help offset the Project-related increase in demand for LACFD and emergency services. Therefore, impacts to fire protection and emergency medical services during the proposed Project's operation would be less than significant, and no mitigation measures are required.

4. Cumulative Impacts

As identified in Section III, Environmental Setting, of this Draft EIR, a total of 191 related projects are located in the vicinity of the Project Site. Of the 191 related projects, 46 of the related projects are located within the City, which is served by LACFD Station Nos. 7 and 8.[23] A map of the related project locations is provided in Figure III-1 in Section III, Environmental Setting, of this Draft EIR

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[21] *KPFF, Memo to City of West Hollywood, 8920 Sunset—Fire Flow/Access Requirements, May 19, 2016.*

[22] *City of West Hollywood, Operating Budget and Capital Work Plan, Two Fiscal Years: 2016–2017 and 2017–2018.*

[23] *The neighboring cities of Los Angeles and Beverly Hills operate their own fire departments. Therefore, related projects in those cities would not be expected to impact LACFD services.*

The proposed Project would not develop residential units and, thus, would not generate a residential population. Therefore, the proposed Project would not contribute to a cumulative increase in the residential service population of LACFD. However, the proposed Project would generate an increase in the non-residential population, which in conjunction with growth forecasted in the City through 2020 (i.e., the first year of occupancy), would generate an increased demand for fire protection service, thus potentially resulting in cumulative impacts on fire protection facilities.

The increase in development and residential service populations generated by the proposed Project and related projects would result in a cumulative increase in the demand for LACFD services and could have a cumulative impact on fire services. Specifically, such would be the case if the proposed Project and other developments in the service area (i.e., those served by LACFD Station Nos. 7 and 8), do not comply with fire department requirements for design and construction. Accordingly, this would result in a significant impact to acceptable service ratios, response times, or other applicable performance objectives for fire protection and/or emergency medical services.

However, similar to the proposed Project, the related projects would be reviewed by the appropriate LACFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project would be required to comply with regulatory requirements related to fire protection and emergency medical services. In addition, the proposed Project and each related project would be subject to their local jurisdiction's standard construction permitting process, which typically includes a review by the LACFD or the appropriate local fire department (i.e., Beverly Hills Fire Department or Los Angeles Fire Department) for compliance with building and site design standards related to fire life safety, as well as coordinating with the applicable water district (i.e., City of Beverly Hills and Los Angeles Department of Water and Power) to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Through annual budgeting processes, the LACFD and local fire departments would also continue to monitor population growth and land development in the region and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through regular budgeting efforts, each fire department's resource needs would be identified and allocated according to the priorities at the time.

Based on the above, the cumulative impacts on fire protection and emergency medical services would be less than significant, and no mitigation measures would be required.

5. Mitigation Measures

With the implementation of Project Design Feature I.2-1 and compliance with regulatory requirements, Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant. Therefore, no mitigation measures are required.

6. Level of Significance After Mitigation

Project-level and cumulative impacts with regard to fire protection and emergency medical services would be less than significant without mitigation.