IV. Environmental Impact Analysis

L. Public Services

1. Fire Protection

a. Introduction

This section analyzes the Proposed Project's impacts relative to the fire and emergency medical services ("EMS") provided by the City of Los Angeles Fire Department ("LAFD"), including service capacity, fire flow requirements, emergency response times and distances, and fire safety equipment and facilities required by the City Fire Code for new construction. This section is based, in part, on information provided by the LAFD in response letters dated January 29, 2009 and February 5, 2009, which are incorporated in Appendix IV.L-1 of this Draft EIR.

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

b. Environmental Setting

(1) Existing Conditions

(a) City of Los Angeles Fire Department

(i) Operational Characteristics

Within the City of Los Angeles, fire protection and EMS are provided by the LAFD as mandated by Article 10, Section 130 of the City of Los Angeles Charter and Section 22.70 of the Los Angeles Administrative Code. The LAFD's services are determined by ongoing evaluations based on community needs. As development occurs within the City, the LAFD

reviews environmental impact reports and applications for subdivisions and determines the facilities that are needed for the provision of adequate fire protection services. Community needs are evaluated by increases in response time, new equipment, personnel and/or the creation of new fire stations needed to provide fire protection services to neighborhoods within the City.[1]

The LAFD has 3,586 uniformed personnel and 353 non-uniformed support staff. Services provided by the LAFD include: fire prevention, firefighting, EMS, technical rescue, hazardous materials mitigation, disaster response, life safety services, public education, and community service. Of the total uniformed professionally trained LAFD staff, 1,104 firefighters (including 242 paramedic-trained personnel) are on duty at all times at 106 neighborhood fire stations, which serve the LAFD's 471 square-mile jurisdiction within the City of Los Angeles.[2]

(ii) Existing Facilities

The Project Site is located within the LAFD Division 2, which has jurisdiction over a 107-square-mile district which covers south Los Angeles and the southern portion of West Los Angeles, as well as the Los Angeles International Airport and Harbor regions. Division 2 is further broken down into five battalions (Battalions 3, 4, 6, 13, and 18) and 33 neighborhood fire stations. The Project Site is located within Battalion 18.

In its written correspondence (see Appendix IV.L-1 to this Draft EIR), the LAFD indicated that there are three fire stations in Battalion 18 that serve the Project area and would provide fire protection services to the Project Site in the event of a fire or emergency situation. These stations include LAFD Fire Station Nos. 92, 58, and 71. Figure IV.L-1, Existing Fire and Police Station Locations, on page IV.L-3 depicts the location of the existing LAFD stations that would serve the Project Site. The LAFD has indicated staffing and equipment levels and facility space at all three of these stations are adequate to provide services to meet the existing demand. Further, the LAFD has indicated that the response times and distances to the Project Site from all three stations currently meet

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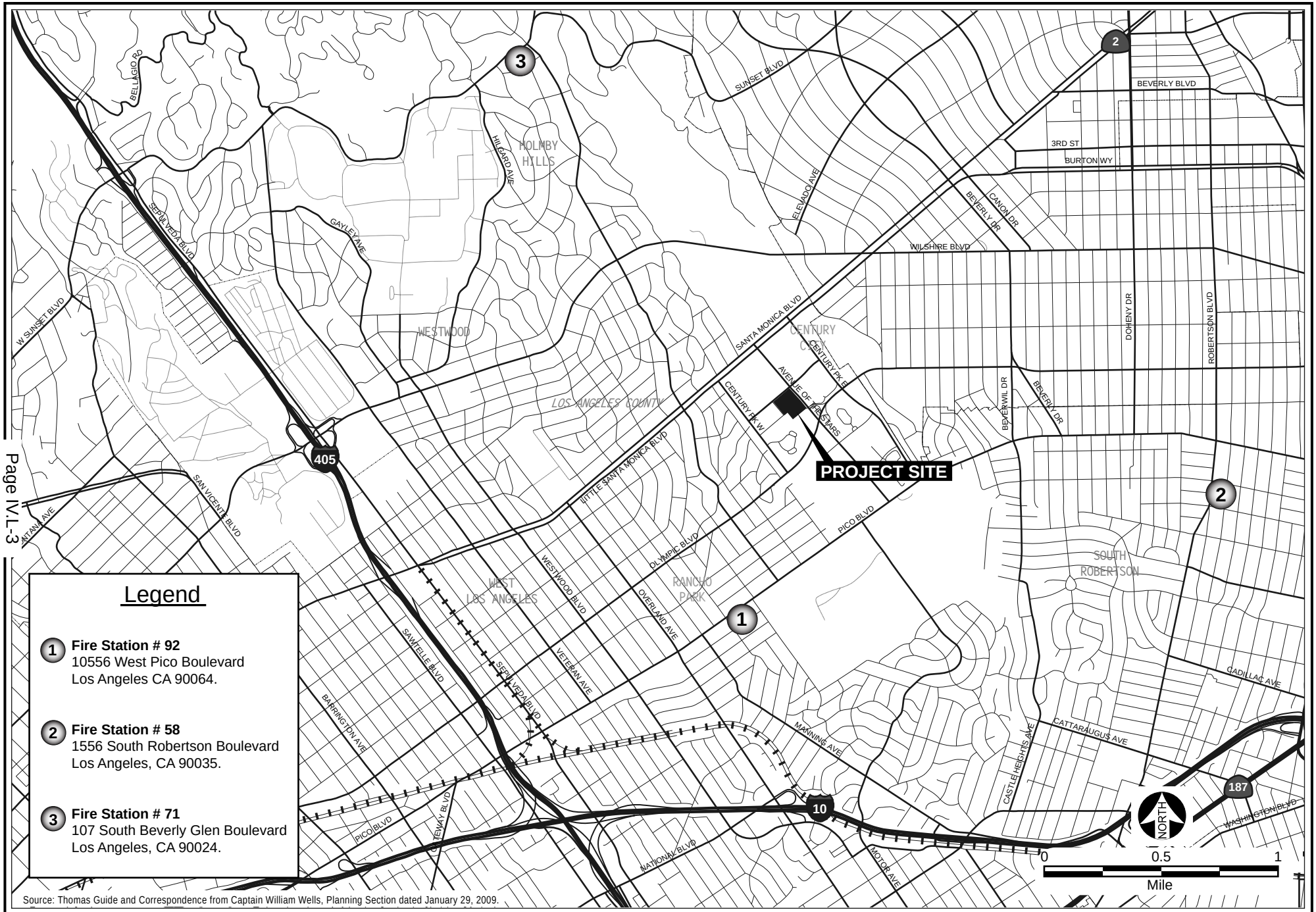
[1] *The City of Los Angeles General Plan Framework, Chapter 9, Infrastructure and Public Services, available online: http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm, accessed May 5, 2010.*

[2] *LAFD, About the LAFD, website: http://www.lafd.org/about.htm, accessed May 5, 2010.*



Source: Thomas Guide and Correspondence from Captain William Wells, Planning Section dated January 29, 2009.

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Figure IV.L-1
Fire Station Locations

LAFD standards.[3] Table IV.L-1, Existing Fire Stations Serving the Project Site, on page IV.L-5 provides a summary of the LAFD fire stations serving the Project Site, followed by a detailed description of each station.

(A) Fire Station 92

Fire Station 92 is located at 10556 West Pico Boulevard in the Century City/Rancho Park community of Los Angeles, and is 1.25 miles southwest of the Project Site. Fire Station 92 would likely be the first to respond to an emergency at the Project Site requiring fire-protection or EMS. As shown in Table IV.L-1, Existing Stations Serving the Project Site, Fire Station 92 is staffed with 12 members at all times. Six members are assigned to the Light Force (Truck and Engine), 4 members are assigned to a Fire Engine, and 2 members are assigned to the Paramedic Rescue Ambulance.

The response time from Fire Station 92 to the Project Site would be approximately 4.9 minutes. The LAFD has indicated that the response time meets the desired response standards of the LAFD.[4] As shown in Table IV.L-2, Existing Fire Stations 2008 Annual Incident Data, on page IV.L-5, Fire Station 92 responded to a total of 2,876 incidents in 2008. Of this total, 800 were to provide basic life services, 1,156 were to provide advanced life services, and 920 were to provide fire-protection services. The LAFD has indicated that there is currently adequate staffing at this station under existing conditions.[5]

(B) Fire Station 58

Fire Station 58 is located at 1556 South Robertson Boulevard in the Pico-Robertson area of Los Angeles, 2.3 miles southeast of the Project Site. As shown in Table IV.L-1, Existing Stations Serving the Project Site, Fire Station 58 is staffed with 12 members at all times. Six members are assigned to Light Force (Truck and Engine), 4 members are assigned to a Fire Engine, and 2 members are assigned to the Paramedic Rescue Ambulance. The response time from Fire Station 58 to the Project Site is approximately 7.0 minutes. The LAFD has indicated that this response time meets the desired response distance standards of the LAFD.[6] As shown in Table IV.L-2, Existing Fire Stations 2008 Annual Incident Data, Fire Station 58 responded to a total of 5,312 incidents in 2008. Of t

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[3] *Written correspondence from Fire Captain William N. Wells, Captain-Paramedic, LAFD Planning Section, January 29, 2009.*

[4] *Ibid.*

[5] *Ibid.*

[6] *Ibid.*

Table IV.L-1
Existing Fire Stations Serving the Project Site

Station No.	Location	Equipment	Personnel	Distance to Project Site (miles)	Response Time to Project Site (minutes)
92	10556 West Pico Boulevard	• 1 Fire Engine • Light Force (Fire Truck and Engine) Company • Paramedic Rescue Ambulance	12 Staff	1.25	4.9
58	1556 South Robertson Boulevard	• 1 Fire Engine • Light Force (Fire Truck and Engine) Company • Paramedic Rescue Ambulance	12 Staff	2.3	7.0
71	107 South Beverly Glen Boulevard	• Single Engine Company • Paramedic Rescue Ambulance	6 Staff	2.5	7.4

Source: Written correspondence from Fire Captain William N. Wells, Captain-Paramedic, LAFD Planning Section, January 29, 2009.

Table IV.L-2
Existing Fire Stations 2008 Annual Incident Data

Station No.	Location	Basic Life Services	Advanced Life Services	Fire Services	Total Station Incidents
92	10556 West Pico Boulevard	800	1,156	920	2,876
58	1556 South Robertson Boulevard	1,596	2,756	960	5,312
71	107 South Beverly Glen Boulevard	360	552	476	1,388

Source: Email correspondence from Fire Captain William N. Wells, Captain-Paramedic, LAFD Planning Section, February 11, 2009.

his total, 1,596 were to provide basic life services, 2,756 were to provide advanced life services, and 960 were to provide fire-protection services. The LAFD has indicated that there is currently adequate staffing at this station under existing conditions.[7]

[7] *Ibid.*

(C) Fire Station 71

Fire Station 71 is located at 107 South Beverly Glen Boulevard in Holmby Hills and is 2.5 miles northwest of the Project Site. As shown in Table IV.L-1 above, Existing Stations Serving the Project Site, Fire Station 71 is staffed with six members at all times. Four of the six members are assigned to the Fire Engine and two members are assigned to the Paramedic Rescue Ambulance. The response time from this fire station to the Project Site is approximately 7.4 minutes. The LAFD has indicated that this response time is adequate and meets the desired response distance standards of the LAFD.[8] As shown in Table IV.L-2, Existing Fire Stations 2008 Annual Incident Data, Fire Station 71 responded to a total of 1,388 incidents in 2008. Of this total, 360 were to provide basic life services, 552 were to provide advanced life services, and 476 were to provide fire-protection services. The LAFD has indicated that there is currently adequate staffing at this station under existing conditions.[9]

(iii) Response Distance and Access

Fire and emergency vehicle access to the Project Site is currently provided by four major roadways in the vicinity of the Project Site; Santa Monica Boulevard to the north, West Olympic Boulevard to the south, and Century Park East and West to the east and west of the Project Site, respectively. Avenue of the Stars and Constellation Boulevard, two secondary roadways, provide access to the Project Site from Santa Monica and Olympic Boulevards. Additionally, emergency access is provided off of Constellation Boulevard via MGM Drive located west of the Project Site and private driveways that provide access to the site.

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

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[8] *Written correspondence from Fire Captain William N. Wells, Captain-Paramedic, LAFD Planning Section, January 29, 2009.*

[9] *Ibid.*

The City of Los Angeles Fire Code specifies the maximum response distances recommended between specific sites and the nearest fire station, based on land use and fire flow requirements. The Project Site is designated as Regional Commercial in the West Los Angeles Community Plan ("Community Plan") which is the highest density commercial land use category in the Community Plan. Pursuant to Section 57.09.07(A) of the Los Angeles Municipal Code ("LAMC"), the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. For high-density commercial land uses, the maximum response distance to a fire station that houses an engine company is 0.75 mile and the maximum response distance to a fire station that houses a truck company is 1 mile (both the engine and truck company requirements apply). The Project Site is within 1.25 miles of Fire Station 92, which houses a truck and engine company; therefore, the Project Site is within the LAMC maximum response distance for residential land uses, but not for commercial land uses. As discussed below, when response distances exceed the specified distances, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems).

(iv) Fire Flow and Hydrant Requirements

In general, the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). Fire flow is normally measured in gallons per minute, as well as the duration of the fire flow. Fire flow requirements can range from 2,000 gallons per minute in low-density residential areas to 12,000 gallons per minute in high-density commercial or industrial areas. Pursuant to Section 57.09.06(A) of the LAMC, a fire flow of 12,000 gallons per minute ("gpm") is required to be available for any city block in high-density commercial areas. A minimum residual water pressure of 20 pounds per square inch ("psi") is required to remain in the water system while the required gpm are flowing, in order to be considered adequate by the City Fire Code standards. The LAFD anticipates that a fire flow of at least 12,000 gpm would be required to be available to the block where the Proposed Project would be located.[10]

Water utilized as part of the Project Site's fire prevention system is provided by the Los Angeles Department of Water and Power ("LADWP"). The Project Site's potable water supply and fire flow are provided by an 8-inch asbestos cement pipe in Constellation

[10] *Email correspondence from Captain Frank K. Comfort, LAFD, Bureau of Fire Prevention, Hydrants and Access/Construction Services, February 05, 2009.*

Boulevard and a 12-inch steel pipe in Avenue of the Stars. As discussed in Section IV.N.2 (Water Supply) of this Draft EIR, both pipes were installed in 1964 with a minimum expected lifespan of 75 years.[11] Service Advisory Requests ("SARs") for fire flow have been prepared for both of the lines that serve the Project Site by LADWP (refer to Appendix IV.N-1 of this Draft EIR). The SARs indicate that the fire service system off the 12-inch line in Avenue of the Stars maintains a maximum system pressure of 55 psi and is capable of providing a maximum fire flow of 6,150 gpm, while the system off the 8-inch line in Constellation Boulevard maintains a maximum system pressure of 59 psi and is capable of providing a maximum fire flow of 3,550 gpm. Therefore, both systems currently exceed the City's minimum residual water pressure requirement of 20 psi and are capable of providing a combined maximum fire flow of 9,700 gpm to the Project Site. As such, existing infrastructure is not adequate to achieve the anticipated fire flow requirement for the Proposed Project of 12,000 gpm. Required improvements and environmental impacts are discussed below under the "Project Impacts" heading.

Requirements for fire hydrant spacing and type of hydrant also vary by type of land development. Pursuant to Section 57.09.06(B) of the LAMC, hydrants in high-density commercial locations such as the Project's must serve a net land area of 40,000 square feet. Additionally, there must be a distance of 300 feet between hydrants on roads and fire lanes and 4" x 4" double fire hydrants must be used.

(2) Regulatory Framework

(a) State of California

(i) State of California Title 24

Title 24 of the California Code Regulations, also known as the California Building Code ("CBC" or "Title 24") contains the design standards that govern the construction of buildings in California to "safeguard life or limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment." The 2007 Edition of the CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. The Triennial 2007 CBC edition became effective January 1, 2008 and is composed of 12 parts. Part 2 of the CBC outlines building design and construction requirements relating to fire, life safety and

[11] *Letter correspondence from Mike Downs, Western District Engineer, Los Angeles Department of Water and Power, October 5, 2009.*

structural safety. Part 7, California Elevator Safety Construction Code, and Part 9, California Fire Code, which provide the standards related to elevator construction and provide overall regulations and design features pertaining to fire safety, have been adopted by reference within the LAMC and City of Los Angeles Fire Code.[12] The 2007 CBC has been adopted by the City of Los Angeles, with amendments, as the City of Los Angeles Uniform Building Code.

(ii) State of California Historical Building Code

Title California Historical Building Code ("CHBC") contains the design standards that govern the construction of buildings in California to "safeguard life or limb, health, property and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment." The intent of the CHBC is to protect California's architectural heritage by recognizing the unique construction challenges inherent in historic buildings and by providing a code to deal with these issues. The CHBC recognizes and endorses the need—on a case by case basis—to find and adopt reasonable alternative or reasonable levels of equivalency for situations where strict compliance with established statues or regulations would negatively affect an historic resource's historic appearance or jeopardize its economic viability. The CHBC is applicable to all issues regarding code compliance for qualified historical buildings or properties, including Fire Code compliance. The CHBC may be used in conjunction with the regular code to provide solutions to facilitate the preservation of qualified historical buildings or properties. The authority for use of the CHBC is vested in Sections 18950 through 18961 of the Health and Safety Code. Section 18954 states, "The building department of every city or county shall apply the provisions of alternative building standards and building regulations adopted by the CHBC Board pursuant to Section 18959.5 in permitting repairs, alterations and additions necessary for the preservation, restoration, rehabilitation, moving or continued use of an historical building or structure."

(b) City of Los Angeles

The City of Los Angeles maintains several regulatory planning documents and codes to ensure adequate fire protection services within the City. These include: The City of Los Angeles General Plan; Chapter 9 of The City of Los Angeles General Plan Framework Element, Infrastructure and Public Services; the City of Los Angeles General

[12] *California Building Standards Commission, California Code of Regulations, Title 24, website: http://www.bsc.ca.gov/title_24/default.htm, accessed May 5, 2010.*

Plan Safety Element, which forms the basis for the LAMC Fire Code; and, the LAMC. A detailed discussion of each of these regulatory mechanisms is discussed below.

(i) Los Angeles General Plan Framework Element

The General Plan Framework Element was adopted by the Council on December 11, 1996, and includes nine chapters; which establish framework elements for; land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation and infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City of Los Angeles General Plan Framework Element, establishes goals, objectives and policies for the provision of infrastructure and public services within the City. The Framework Element also outlines the necessary actions which the City must implement in order for the provision of public services and infrastructure to remain viable, sustainable and able to support the public services needs associated with the growth of the population and economy.

Specifically, Goal 9J of the General Plan Framework Element establishes the primary goal that "every neighborhood has the necessary level of fire protection services, EMS and infrastructure."[13]

Chapter 9 further establishes four objectives for the provision of fire services within the City of Los Angeles to ensure that Goal 9J is met. These objectives are as follows:

Objective 9.16: Monitor and forecast demand for existing and projected fire facilities and services.

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.

Objective 9.18: Phase the development of new fire facilities with growth.

Objective 9.19: Maintain the LAFDs ability to assure public safety in emergency situations.

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[13] *The City of Los Angeles General Plan Framework, Chapter 9, Infrastructure and Public Services, available online: http://cityplanning.lacity.org/cwd/framwk/chapters/09/09.htm, accessed May 5, 2010.*

The above stated objectives provide the basis for the nine corresponding policies related to the provision of fire services under Goal 9J of the General Plan Framework Element. Of these nine policies, those relative to the analysis of Proposed Project's impact on the provision of fire protection services are as follows:

Policy 9.16.1. Collect appropriate fire and population development statistics for the purpose of evaluating fire services needs based on existing and future conditions.

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 EMS when developing general plan amendments and zone changes, or considering discretionary land use permits.

(ii) Los Angeles General Plan Safety Element

The City Council adopted the Safety Element of the General Plan on November 26, 1996. The subject Safety Element replaced three previously adopted elements of the General Plan: the 1975 Safety Element, the 1979 Fire Protection and Prevention Element, and 1974 Seismic Safety Element. All three previously adopted plans were combined into the current Safety Element. The Safety Element, relative to the provision of fire services, outlines a history of fire rescue and the establishment of the Fire Department within the City of Los Angeles. Furthermore, the Safety Element establishes goals and policies regarding emergency response time and minimum standards for LAFD facilities. Specifically, Policy 2.1.6 (Standards/Fire) requires the LAFD to "continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression." Policy 2.1.6 is implemented through the components, requirements and standards of the LAMC Fire Code, which is discussed in detail below, such as peak load water requirements, and other standard code requirements including road widths, access, clearances around structures, and other standards or procedures relative to fire suppression. Additionally, Policy 2.1.6 forms the basis for the LAMC requirements regulating the minimum standards for the location and expansion of fire facilities based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical response within the City of Los Angeles.[14]

[14] *The City of Los Angeles General Plan Safety Element, Section 111, page 3, adopted November 26, 1996, available online: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed May 5, 2010.*

(iii) West Los Angeles Community Plan

The Community Plan was adopted in 1999 as one of 35 community plans that comprise the City's General Plan Land Use Element. The West Los Angeles Community Planning Area ("CPA") encompasses approximately 7.06 square miles and contains a diverse mix of land uses comprised of single- and multi-family residential, commercial/retail, and industrial land uses.

All development within the CPA is subject to the planning guidelines of the adopted Community Plan. The overarching fire protection goal of the Community Plan is to "protect the community through a comprehensive fire and life safety program." To this end, the Community Plan includes the following specific policies:

- Coordinate with the Fire Department the review of significant development projects and General Plan amendments affecting land use to determine the impact on service demands; and

- Assist the Fire Department in locating fire service facilities at appropriate locations throughout the Community.

For further discussion regarding the applicable goals and policies of the Community Plan, see Section IV.I (Land Use Planning) of this Draft EIR.

(iv) City Charter and Los Angeles Administrative Code

The Los Angeles Administrative Code outlines and establishes administrative and organizational procedures for the City of Los Angeles and serves to incorporate and enact the Charter of the City of Los Angeles. Article 5 of the Los Angeles City Charter charges the LAFD with the power and duty to:

(a) control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires;

(b) enforce all ordinances and laws relating to the prevention or spread of fires, fire control and fire hazards within the City, and the waters under the jurisdiction of the City, and vessels or structures thereon, provided however that nothing herein shall require the Fire Department to provide services to, on, in, or for the benefit of any lands, waters, properties or waterfront under the control of the Harbor Department, except pursuant to an agreement by the Board of Harbor Commissioners to reimburse the General Fund for the costs of those services;

(c) conduct fire investigations; and

(d) protect lives and property in case of disaster or public calamity.[15]

(v) Los Angeles Fire Code

The Los Angeles Fire Code is a portion of the LAMC. Chapter V, Public Safety and Protection, Article 7 of the LAMC establishes the Fire Protection and Prevention Code for the City of Los Angeles. Article 7 consists of 141 Divisions which govern and concern fire protection and prevention. According to Article 7, its purpose is to "prescribe laws for the safeguarding of life and property from fire explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises; and to prescribe such other laws as it may be the duty of the Fire Department to enforce."[16] Specifically, Division 9 establishes access, hydrant and fire flow requirements; and Division 118 outlines standards and requirements for new high-rise buildings and incorporates State of California Title 24 requirements. All construction within the City of Los Angeles must comply with the applicable divisions within Chapter V, Article 7 of the LAMC.

As mentioned above, Division 9 of the LAMC Fire code establishes access, hydrant and fire flow requirements within the City. Fire flow, access and hydrant requirements are a function of the land use classifications, zoning requirements and intensity of development. As such, fire flow requirements can range from 2,000 gallons per minute in low-density residential areas to 12,000 gallons per minute in high-density commercial or industrial areas. A minimum residual water pressure of 20 psi is required to remain in the water system while the required gallon per minute is flowing, in order to be considered adequate by the City Fire Code standards. Further, Division 9 also establishes response requirements of the LAFD. Pursuant to Section 57.09.07(A) of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. For high-density commercial land uses, the maximum response distance to a fire station that houses an engine company is 0.75 mile and the maximum response distance to a fire station that houses a truck company is 1 mile (both the engine and truck company requirements apply). When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). Lastly, Division 9 establishes fire access requirements for buildings within the City. Pursuant to

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[15] *Charter of the City of Los Angeles, available online: http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:la_charter, accessed May 5, 2010.*

[16] *LAMC, Chapter 5, Article 7, Section 57.01.02, Purpose.*

Section 57.09.03.B, Division 9 of the LAMC Fire Code, if the exterior wall of a building is more than 150 feet away from a roadway or approved street an approved fire lane should be installed to provide fire access, and said lane would have access within 150 feet of the exterior wall of the building.

Division 118 of the LAMC Fire Code is comprised of twelve sections which provide fire protection and suppression design guidelines for all new high-rise buildings within the City. These sections include the following requirements and design incorporations: fire control room requirements, building communication requirements, LAFD communication systems, elevator system requirements, fire protective signaling systems, emergency smoke control systems, standby and emergency power systems, stair shaft doors, pressurized shaft doors, automatic sprinkler systems and emergency helicopter landing facilities.

LAMC Chapter IX, Article 1, Division 72 Section 91.7201 establishes the geographical boundaries and design requirements of Fire District No. 1 and the Very High Fire Hazard Severity Zone. Inclusion in Fire District 1 is determined by a building's location within the territory bounded by the streets and freeways outlined in Section 91.7201.01. The Project Site is located within the area of Century City deemed to be within Fire District 1 located within the "westerly boundary of the City of Beverly Hills from Santa Monica Boulevard to Olympic Boulevard." Division 72 outlines specific building requirements relative to fire protection and suppression, which buildings located within Fire District 1 must comply with, such as type of construction permitted, and requirements for exterior wall and roof coverings as they relate to the fire resistance and rating of the construction materials. The Project Site is not located within a Very High Fire Hazard Severity Zone.

(vi) City of Los Angeles Fire Facilities Proposition F

In 1990, the City of Los Angeles completed a Facilities Master plan study to evaluate the existing fire service, equipment and facilities of the LAFD. The study found that most of the City's fire stations were not large enough to accommodate the equipment and personnel needed to adequately deploy fire protection services with the City of Los Angeles. As a result of this finding, on November 7, 2000, Proposition F was placed on the ballot and approved by voters within the City. Proposition F provides for the acquisition of $532.6 million in General Obligations Bonds to make needed improvements to Fire Stations and Animal Shelters within the City of Los Angeles. Of those funds approved under Proposition F, $378.6 million of the funds were allocated to the improvement of 19 neighborhood Fire/Paramedic Stations. Additionally, these funds will provide for the "construction of two new state of the art Recruit Training Centers (one with Regional Fire/Paramedic Components), replace six existing Fire Stations with new Regional Fire/Paramedic Stations, add one new Regional Fire/Paramedic Station, convert and expand two existing Fire Stations to Regional Fire/Paramedic Stations, replace nine

existing Fire Stations with new Standard Fire/Paramedic Stations, add one new Satellite Fire/Paramedic Station in the San Pedro area, and build a new Air Operations Helicopter Facility & General Services Helicopter Fleet Maintenance Building."[17] None of the three fire stations that serve the Project Site are planned for improvements under Proposition F.

c. Environmental Impacts

(1) Methodology

The following analysis considers three components: (1) demand for LAFD fire protection services; (2) fire flow infrastructure; and (3) response time and emergency access. The analysis of demand for services discusses the potential increase in demand for fire protection services at the Project Site, and any resulting expansion to existing fire stations or construction of new stations to house equipment and staff to meet the additional demand. The discussion of fire flow infrastructure identifies water supply availability and infrastructure improvements for providing adequate fire protection services to the Project Site. The analysis of response time and emergency access discusses potential access restriction due to construction, as well as implications for reduced emergency access due to roadway congestion.

(2) Thresholds of Significance

The *LA CEQA Thresholds Guide* (2006) requires the public services analysis to address the following three components: (1) demand for LAFD fire protection services; (2) fire flow infrastructure; and (3) response time and emergency access.

The determination of significance with regard to fire protection services shall be made on a case-by-case basis, considering the following factor:

- 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.

[17] *Los Angeles Department of Public Works, Bureau of Engineering, Proposition F – Facilities Bond, website: http://eng.lacity.org/projects/fire_bond/index.htm, accessed May 5, 2010.*

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

(3) Project Design Features

Both Option A and Option B would implement the following Project Design Features (PDFs) which are considered in the analysis of potential Project impacts:

(a) Construction

- A Construction Staging and Traffic Management Plan ("CSTMP") would be prepared for approval by the Los Angeles Department of Transportation ("LADOT") and other appropriate agencies, and implemented during Proposed Project construction. The CSTMP would describe the traffic control measures and devices to be implemented for the various construction phases, along with any sidewalk closures, traffic lane closures, temporary walkway installations, K-rail installations, temporary traffic lane modifications, temporary signal modifications, etc. The CSTMP would also include the name and phone number of a contact person who can be reached 24 hours a day regarding construction traffic complaints or emergency situations. In addition, the CSTMP would take into account and be coordinated with other CSTMPs that are in effect or have been proposed for other projects in Century City.

- A general Construction Management Plan ("CMP") would be prepared and implemented, subject to the approval of LAFD. The CMP would outline best management practices ("BMP") for the handling and storage of all flammable construction materials, specify methods and requirements for cleanup of flammable materials, and show specific well-marked entrances/emergency access points to the Project Site that would remain clear and unobstructed at all times during construction.

- Construction vehicles, including construction personnel vehicles, would not park on public streets, including streets outside Century City.

- Construction vehicles would not stage or queue where they interfere with pedestrian and vehicular traffic or block access to nearby businesses.

- Any staging of construction vehicles on public streets, including streets outside Century City, would be approved by LADOT and, if necessary, other appropriate agencies.

- If necessary, any traffic lane closures would be limited to off-peak traffic periods, as approved by LADOT.

- Flag persons in adequate number would be provided to minimize impacts to traffic flow, and to ensure the safe access into and out of the site.

- To the extent feasible, the delivery of construction materials would be scheduled during the off-peak traffic periods.

- Heavy-duty construction vehicles, except haul trucks, would arrive at the site no sooner than 7:00 A.M. and depart no later than 6:00 P.M.

- The hours and operation of haul trucks transporting demolished materials and excavated soil from the site would be determined and approved by the LADBS.

(b) Operation

- The Proposed Project would comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design would incorporate the standards and requirements as set forth by: Title 24, the City of Los Angeles Safety Element, the LAMC Fire Code, and any additional code requirements established by the LAFD relative to fire prevention, safety, suppression, and emergency access and response, except where such requirements are in conflict with the CHBC. In these cases, a reasonably equivalent alternative to the regular code would be enforced in accordance with the CHBC.

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

    - Access for Fire Department apparatus and personnel to and into all structures shall be required.

    - No proposed development utilizing cluster, group, or condominium design of one or two family dwellings shall be more than 150 feet from the edge of the roadway of an improved street, access road, or designated fire lane.

    - Building designs for multi-residential buildings shall incorporate at least one access stairwell off the main lobby of the building; but in no case greater than 150 feet horizontal travel distance from the edge of the public street, private street, or fire lane.

    - Entrance to the main lobby shall be located off the address side of the building.

    - Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of site of the main entrance stairwell or to the satisfaction of the LAFD.

- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- All structures shall be fully sprinklered pursuant to LAMC Section 57.09.07(A).
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- At least two different ingress/egress roads for each area, which would accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.

(4) Project Impacts

Option A would remove all improvements at the Project Site, including the Existing Hotel and associated buildings, as well as all landscaping, and construct a mixed-use development that would include two 49-story buildings positioned on the north and south sides of an approximately two-acre (including courtyards) publicly accessible plaza that would be surrounded by ground-level retail and restaurant uses. Option A would consist of residential, hotel, and office uses, as well as retail and restaurant uses. Pursuant to the definition of floor area provided by LAMC Section 12.03, Option A would result in a net increase of 884,293 square feet of residential space, a net increase of 114,000 square feet of office space, a net decrease of 419,884 square feet of hotel and hotel amenity space, and a net increase of 106,000 square feet of retail and restaurant space on the Project Site, totaling a net increase of 684,409 built square feet on the Project Site. In terms of hotel rooms, Option A would reduce the number of rooms from 726 in the Existing Hotel to 240 rooms.

Option B would retain and rehabilitate the Existing Hotel into a mixed-use building containing hotel, residential, retail, and restaurant uses ("Rehabilitated Building"). Additional development would be provided surrounding the Rehabilitated Building including two 46-story buildings symmetrically positioned behind (west of) the Rehabilitated Building, and one-story retail and restaurant buildings along Constellation Boulevard and Avenue of the Stars. Pursuant to the definition of floor area provided by LAMC Section 12.03, the Option B With Office Scenario would result in a net increase of 829,948 square feet of

residential space, a net increase of 101,500 square feet of office space, a net decrease of 250,324 square feet of hotel and hotel amenity space, and a net increase of 93,840 (non-hotel) square feet of retail and restaurant space on the Project Site, for a total net increase of 774,964 square feet on the Project Site. The Option B Without Office Scenario would result in a net increase of 935,166 square feet of residential space, no net increase in office space, a net decrease of 250,324 square feet of hotel and hotel amenity space, and a net increase of 93,840 (non-hotel) square feet of retail and restaurant space on the Project Site, for a total net increase of 778,682 square feet on the Project Site.

(a) Construction Impacts – Option A and Option B

Construction of the Proposed Project under both Option A and Option B would increase the potential for accidental on-site fires from such sources as the operation of construction equipment and the use of flammable construction materials. The implementation of BMPs for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Proposed Project under both Option A and Option B. The BMPs that would be implemented during demolition and construction of the Project include: the maintenance of mechanical equipment in good operating condition; and as required by law, careful storage of flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

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

(1) Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD;

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

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

(4) The Proposed Project would implement the construction PDFs listed above, which include the preparation and implementation of a CSTMP which would be coordinated with CSTMPs for other construction projects in Century City.

Based on the above reasons, construction of the Proposed Project under both Option A and Option B would not be expected to affect fire protection service and EMS to the extent that there would be a need for any additional new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Thus, construction-related impacts to fire protection and EMS would be less than significant under both Option A and Option B.

(b) Operational Impacts – Option A and Option B

Both Option A and Option B would result in an increase in built square footage, potential employees, site visitors, and residents on the Project Site. As previously discussed, Option A would result in a net increase of 684,409 square feet on the Project Site. The Option B With Office Scenario would result in a net increase of 774,964 square feet on the Project Site. The Option B Without Office Scenario would result in a net increase of 778,682 square feet on the Project Site. As discussed in Section IV.K (Population and Housing) of this Draft EIR, Option A would increase the resident population of the Project Site by approximately 677 residents while Option B would increase the resident population by approximately 600 residents (under the With Office Scenario) to 808 residents (under the Without Office Scenario).[18] Additional employees would also be introduced to the Project Site through the various commercial uses proposed under both Option A and Option B. As shown in Table IV.I-4 in Section IV.I (Land Use) of this Draft EIR, Option A would result in a net increase of approximately 471 employees on-site. The Option B Without Office Scenario would result in a net increase of approximately 192 employees on-site, and the Option B With Office Scenario would result in an increase of approximately 547 employees on-site. Thus, the total net increase of on-site resident and employee population would be approximately 1,148 persons under Option A (677 residents + 471 employees), 1,000 persons under the Option B Without Office Scenario (808 residents + 192 employees), and 1,147 persons under the Option B With Office Scenario (600 residents + 547 employees). In addition, both Option A and Option B would also increase the number of people on the Project Site who are hotel guests and retail and restaurant visitors. However, the assumption that all residents, employees, and visitors to

[18] *Based on a rate of 2.26 persons per dwelling unit for condominium units and 1.0 person per dwelling unit for housekeeping units. City of Los Angeles Planning Department, Demographics Research Unit, April 9, 2010.*

the Project Site would be present on-site at all times is very conservative. Similarly, many employees located on-site during daytime hours would return to their places of residence after business hours. Overall, the increased number of people on the Project Site including potential employees, site visitors, and residents, as well as the increased amount of built square footage on the Project Site, would generate an increase in the demand for fire protection service and EMS under Both Option A and Option B. The analysis below considers the above mentioned criteria for determining the Proposed Project's impacts to fire protection service and EMS.

(i) Facilities and Equipment

When considering facilities and equipment, the adequacy of fire protection for a given area is based on the LAFD's judgment for needs in that area. As noted above, implementation of the Proposed Project under both Option A and Option B is anticipated to create an increased demand for LAFD services at the Project Site.

The LAFD has indicated that the existing service capabilities are adequate to meet the current demand for LAFD services in the Project area. Furthermore, the LAFD has indicated that the Proposed Project would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.[19]

LAFD currently has a system of rolling brownouts, referred to as the modified coverage plan, under which LAFD temporarily closes 22 fire companies and six ambulance teams on a daily basis to save money. The firefighters from the closed companies are rotated to different companies. Subsequent to receiving LAFD's written correspondence regarding the Project, the City Council passed a new budget which will permanently close 18 fire companies and four ambulances at stations across the City. However, none of the City's 106 stations will be closed. However, the Council restored the 318 firefighter positions that would have been reduced through attrition under the original proposal.

The new budget could result in the downsizing of Fire Station 92. The 5th Council District Office is currently working towards avoiding this outcome, and a formal determination had not been made at the time of public circulation of this Draft EIR. Nonetheless, should Fire Station 92 have its service capabilities reduced, the Proposed Project would continue to be served by Fire Stations 58 and 71. As shown in Table IV.L-1 on page IV.L-5, Fire Station 58 provides the same facilities and equipment mix, and the

[19] *Correspondence from Fire Captain William N. Wells, Captain-Paramedic LAFD, dated January 29, 2009.*

same number of personnel, as Fire Station 92. It is also likely that equipment or personnel subject to the downsizing of Fire Station 92 would be redeployed to Fire Stations 58 and 71. Thus, downsized Fire Station 92, together with Fire Stations 58 and 71, would be able to provide an equivalent level of fire protection service to the Proposed Project. With regard to impacts related to the additional response distance and response time for Fire Stations 58 and 71, refer to the "Response Distance and Emergency Access" heading, below. Thus, operation of the Proposed Project would result in a less than significant impact on LAFD facilities and equipment under both Option A and Option B. No mitigation measures are required.

(ii) Fire Flow

As discussed above, the LAFD anticipates that a fire flow of 12,000 gpm would be required to be available for the Proposed Project block upon implementation of the Proposed Project, pursuant to Section 57.09.06(A) of the LAMC. A minimum residual water pressure of 20 psi is required to remain in the water system while the required gallons per minute are flowing, in order to be considered adequate by the City Fire Code standards. The final fire flow required for the Proposed Project would be established by the LAFD during its review of the Proposed Project plot plan, prior to the issuance of a building permit by the City.

As discussed above, water for fire flows in the vicinity of the Project Site is provided by the LADWP. Refer to Section IV.N-2 (Water Supply) of this Draft EIR for a discussion of water service infrastructure in the project area. All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. As discussed above, SARs for the fire service systems that currently serve the Project Site have been prepared by LADWP (refer to Appendix IV.N-1 of this Draft EIR). The SARs indicate that the fire service system off the 12-inch line in Avenue of the Stars maintains a maximum system pressure of 55 psi and is capable of providing a maximum fire flow of 6,150 gpm, while the system off the 8-inch line in Constellation Boulevard maintains a maximum system pressure of 59 psi and is capable of providing a maximum fire flow of 3,550 gpm. Therefore, both systems currently exceed the City's minimum residual water pressure requirement of 20 psi and are capable of providing a combined maximum fire flow of 9,700 gpm to the Project Site, which is not adequate to achieve the anticipated 12,000 gpm fire flow requirement for the Proposed Project. To provide a fire flow of 12,000 gpm, the LADWP has indicated that a portion of the existing 8-inch line in Constellation Boulevard would need to be replaced with a 12-inch line beginning at the Avenue of the Stars tie-in and extending 375 feet to the west. A SAR has been prepared for a proposed 12-inch line in Constellation Boulevard and is also included in Appendix IV.N-1 of this Draft EIR. The SAR indicates that the proposed line could provide a fire flow of 6,300 gpm for a combined fire flow of 12,450 gpm, which would meet the anticipated fire flow requirement. Accordingly, Mitigation Measure L-1 is included to

ensure that the required upgrade is implemented prior to Proposed Project occupancy. In addition, LADWP is in the design stage with respect to a new regulator pump station for Century City which is anticipated to be completed in 2012 or 2013. LADWP has confirmed that the pump station will alleviate water pressure issues in Century City.[20] Final fire flows would be reviewed through the LADBS's standard review and permitting procedures to ensure that they are adequate and meet the requirements of the LAMC, the Los Angeles Fire Code, and the requirements of the LAFD. Additionally, to ensure adequate fire protection services to the Project Site, as a condition of approval the Project Applicant would be required to submit a plot plan to the LAFD for approval during the City plan check process. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan would ensure adequate fire flow to the Project Site. Thus, with implementation of Mitigation Measure L-1 and standard City review and permitting procedures, the Proposed Project under both Option A and Option B would result in a less than significant impact with respect to fire flow.

Under both Option A and Option B, the Proposed Project would provide flow capacity and fire hydrants in accordance with the LAMC, the Los Angeles Fire Code, and the requirements of the LAFD. Therefore, the Proposed Project would result in a less than significant impact with regard to fire flow under both Option A and Option B. No mitigation measures are required.

(iii) Response Distance and Emergency Access

As previously discussed, the Proposed Project would be served by the same three existing and operational Fire Stations that currently serve the Project Site; Station 92, which is 1.25 miles southwest of the Project Site; Station 58, which is 2.3 miles southeast of the Project Site; and Station 71 which is 2.5 miles northwest of the Project Site. The estimated response times from each station to the Project Site are 4.9 minutes for Fire Station 92, 7.0 minutes from Fire Station number 58, and 7.4 minutes from Fire Station 71. The LAFD has indicated that the response times to the Project Site from the above stated fire stations that serve the existing uses on the Project Site are sufficient to meet the current demand and response distance standards of the LAFD.[21]

Pursuant to Section 57.09.07(A) of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck

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[20] *Letter correspondence from Ronald O. Nichols, General Manager, Los Angeles Department of Water and Power, March 23, 2011. See Appendix IV.N-1 to this Draft EIR.*

[21] *Ibid.*

company is 1.5 miles. For high-density commercial land uses, the maximum response distance to a fire station that houses an engine company is 0.75 mile and the maximum response distance to a fire station that houses a truck company is 1 mile (both the engine and truck company requirements apply). When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). The Project Site is within 1.25 miles of Fire Station 92, which houses a truck and engine company; therefore, the Project Site is within the LAMC maximum response distance for residential land uses, but not for commercial land uses. Furthermore, if Fire Station 92 were to be closed or downsized as discussed above, the Project Site would be outside the LAMC maximum response distances for both residential and commercial land uses. Therefore, each structure would be equipped with a sprinkler system as indicated in the Project PDFs.

Emergency access to the Project Site would be provided by the original circular driveway at the front of the Rehabilitated Building, the two additional private driveways that would extend to the north and south buildings from the original circular driveway, and MGM Drive. While the Proposed Project is anticipated to affect vehicle/capacity ratios and the level of service of roadways in the Project vicinity, the implementation of a Transportation Demand Management program and Project-specific intersection and roadway improvements would help to reduce Project-related traffic impacts on area intersections and roadways under both Option A and Option B. However, based on performance criteria established by the City of Los Angeles Department of Transportation, traffic conditions would not be mitigated to less than significant levels for two intersections under Option A and three intersections under the Option B With Office Scenario, as discussed in Section IV.M, Transportation/Traffic, of this Draft EIR. These effects could potentially affect response times in the area during Project operation. However, increases in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. This impact is not considered significant since emergency response times would not be substantially affected given that there is a significant traffic impact at limited locations, and given the availability of alternative routes within the street pattern in the area surrounding the Project Site. Based on the Project's proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to on-site areas within the established response time.

Therefore, operational impacts with respect to response distance and emergency access under both Option A and Option B would be less than significant. No mitigation measures are required.

(iv) Extended Horizon Analysis

While the Applicant intends to complete construction of the Proposed Project by 2015, it is at least possible that the Proposed Project might not be completed until as late as 2027. As noted in Section II (Project Description) of this Draft EIR, the Applicant requests approval of a Development Agreement ("DA") which would confer on the Applicant a vested right to develop the Proposed Project throughout the term of the agreement. It is expected that the DA would be approved in 2012 and the terms of the agreement would be for a period of 15 years, thereby expiring in 2027. In the unlikely event that the Project buildout year was to be extended by 12 years to coincide with the anticipated expiration of the term of the DA in 2027, the Proposed Project's impacts to fire protection service would remain less than significant under both Option A and Option B. As discussed in Section IV.K (Population and Housing) of this Draft EIR, the population and housing growth from the Proposed Project would be within the Southern California Association of Governments (SCAG)'s forecasted population and housing growth for the City of Los Angeles Subregion for 2015 under both Option A and Option B. As SCAG forecasts increase over time, the Proposed Project would also be within future growth projections for 2025 and 2030, the projection years closest to the conceivable buildout date of 2027.[22] SCAG forecasts form the basis for updating the General Plan Framework, which in turn sets a long-term growth strategy for updating the Community Plans and General Plan Elements. Thus, the Project's consistency with SCAG growth forecasts implies that it would be accounted for in the City's long-term growth planning for fire and other public facilities throughout 2027. Therefore, the conclusions presented above regarding the Proposed Project's impacts to fire protection service would not change if the Project buildout year were to be extended to 2027.

d. Cumulative Impacts

The geographic area for cumulative analysis of fire protection and EMS is the combined service area of Fire Stations 92, 58, and 71 (which currently serve the Project Site). Of the 155 related projects identified in the related projects list (see Section III., Environmental Setting of this Draft EIR), 87 related projects proposing a variety of land uses (residential, retail and commercial, and institutional) are located within the area served by Fire Stations 92, 58, and 71.

[22] *As discussed in Section IV.K (Population and Housing) of this Draft EIR, SCAG forecasts are provided in 5-year increments.*

Operation of the related projects is anticipated to increase the overall demand for fire protection services provided by Fire Stations 92, 58, and 71. Specifically, there would be increased demands for additional LAFD staffing, equipment, and facilities at these stations over time to serve these additional land uses. These needs would be funded via existing mechanisms (i.e., property taxes and government funding), to which the Proposed Project and related projects would contribute.

As noted earlier, the LAFD has indicated that Fire Stations Nos. 92, 58, and 71 would be able to support the projected future demands of the Proposed Project without the need to construct additional facilities. Similar to the Proposed Project under both Option A and Option B, each of the related projects would be subject to Title 24 building code regulations and individually subject to LAFD review and compliance with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles, including the City's Building and Fire Codes. High-rise projects would be required to comply with Division 118 of the LAMC Fire Code, including the installation of sprinkler and other safety systems. Additionally, all related projects would be required to comply with the same construction access requirements to assure that LAFD access remains clear during all demolition and construction activities. Any related project that exceeded the applicable response distance standard of LAMC Section 57.09.07(A) would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. In addition, should Fire Station 92 have its service capabilities reduced, the related projects would continue to be served by Fire Stations 58 and 71. As shown in Table IV.L-1 on page IV.L-5, Fire Station 58 provides the same facilities and equipment mix, and the same number of personnel, as Fire Station 92. It is also likely that equipment or personnel subject to the downsizing of Fire Station 92 would be redeployed to Fire Stations 58 and 71. Thus, downsized Fire Station 92, together with Fire Stations 58 and 71, would be able to provide an equivalent level of fire protection service to the Project area.

Construction of the Proposed Project would occur adjacent to Avenue of the Stars, Constellation Boulevard, MGM Drive, and Century Drive. Three of the related projects, including the New Century project, the Constellation Park project, and The Century project, are located along these roadways near the Project Site. Construction of The Century was completed prior to the circulation of this Draft EIR. Construction of the other two related projects could occur concurrently with the Proposed Project. It is anticipated that both of these related projects, as well as the Proposed Project, would be required to implement CSTMPs. One of the purposes of these plans is to maintain roadway capacity adequate for emergency vehicle access on streets with neighboring construction sites. As noted in the discussion of the Proposed Project's PDFs, the Proposed Project's CSTMP would be coordinated with those of the nearby related projects. Also, emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in lanes of opposing traffic. For these reasons, cumulative impacts associated with

emergency access on the surrounding roadways, due to construction activities, would be expected to be less than significant under Options A and B.

As discussed above, the potential exists for the Project buildout year to be extended by 12 years to coincide with the anticipated expiration of the term of the DA in 2027. In the unlikely event that this was to happen, cumulative impacts to fire protection service would remain less than significant. As discussed in Section IV.K (Population and Housing) of this Draft EIR, the cumulative population and housing growth from the Proposed Project and the related projects in the City of Los Angeles would be within the Southern California Association of Governments (SCAG)'s forecasted population and housing growth for the City of Los Angeles Subregion for 2015 under both Option A and Option B. As SCAG forecasts increase over time, the Proposed Project and the related projects would also be within future growth projections for 2025 and 2030, the projection years closest to the conceivable buildout date of 2027.[23] SCAG forecasts form the basis for updating the General Plan Framework, which in turn sets a long-term growth strategy for updating the Community Plans and General Plan Elements. Thus, the Project and the related projects' consistency with SCAG growth forecasts implies that they would be accounted for in the City's long-term growth planning for fire and other public facilities throughout 2027. Furthermore, all future development projects through 2027 would be subject to discretionary review by the LAFD, would be required to implement measures to ensure that no significant impacts to fire protection services would occur, and would comply with LAMC regulations related to fire safety, access, and fire flow. Therefore, the conclusions regarding cumulative impacts to fire protection service would not change if the Project buildout year were to be extended to 2027.

Overall, the Proposed Project would not have a cumulatively considerable incremental effect upon fire protection services and the Proposed Project's cumulative impact would be less than significant under both Option A and Option B.

e. Mitigation Measures

The following Mitigation Measure is required for both Option A and Option B to mitigate significant impacts related to fire flow:

L-1 In order to allow for a water flow of 12,000 gpm to the Project Site, a 12-inch line on Constellation Boulevard shall be constructed to replace a portion of

[23] *Ibid.*

the existing 8-inch line between Avenue of the Stars and MGM Drive. The upgrade of this waterline on Constellation Boulevard between Avenue of the Stars and Century Park West has already been assigned to the applicant of the adjacent New Century Project as Mitigation Measure I.1-1 of the New Century Plan EIR (State Clearinghouse No. 2006061096). If construction of this improvement has not been completed by Westfield US Holding, LLC ("Westfield") prior to the receipt of a temporary Certificate of Occupancy for the residential component of the Proposed Project, the Project Applicant shall either install its portion of the line or provide payment of fees to the Los Angeles Department of Water and Power for its portion of the construction. If construction of the improvement has been completed by Westfield prior to the receipt of a temporary Certificate of Occupancy for the residential component of the Proposed Project, the Project Applicant shall have no further mitigation responsibilities with regard to water flow to the Project Site. If this requirement is satisfied through the payment of fees to the Los Angeles Department of Water and Power, the Project Applicant's fee shall consist of a fair share contribution subject to the approval of the Los Angeles Department of Water and Power. If this requirement is satisfied through construction by the Project Applicant, the design of the water line shall be subject to the approval of the Los Angeles Department of Water and Power and the Los Angeles Fire Department.

f. Level of Significance After Mitigation

With implementation of Mitigation Measure L-1, the Proposed Project would have a less than significant impact on fire protection services provided by the LAFD under both Option A and Option B.