

IV. Environmental Impact Analysis

I.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on fire protection services. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site and considers the following factors used by the Los Angeles Fire Department (LAFD) to determine the adequacy of fire protection services for a given area: fire flow requirements, response distance from existing fire stations; and LAFD's judgment for needs in the area. Emergency access to the Project Site and surrounding uses is also considered. This analysis is based, in part, on information available on LAFD's website, written correspondence from the LAFD (August 28, 2017) included in Appendix H of this Draft EIR, and on the *Water and Sewer Infrastructure Assessment Report* (Utility Report), prepared for the Project by Fuscoe Engineering, (March 2017, revised January 2018), which is included in Appendix O of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

(a) 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 federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(b) California Building Code and California Fire Code

The California Building Code (California Code of Regulations, Title 24, Part 2) 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, 2017.¹ The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2016 California Fire Code also went into effect on January 1, 2017.² Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.

(c) California Vehicle Code

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

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

¹ California Building Code, (California Code of Regulations, Title 24, Part 2).

² California Fire Code, (California Code of Regulations, Title 24, Part 9).

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

driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety.... (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(d) California Constitution Article XIII, Section 35

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

In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁴ The *Hayward* ruling also concluded that “assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings” and the “need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate.”⁵

(2) City of Los Angeles

(a) City of Los Angeles Charter

Section 520 of the Los Angeles City Charter states that the LAFD’s duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the

⁴ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

⁵ *Ibid.*

prevention or spread of fires, fire control, and fire hazards within the City, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles (City) General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood have the necessary level of fire protection service, emergency medical service, and infrastructure.⁶ Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. The City of Los Angeles General Plan Safety Element, discussed below, recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies. Under the Framework Element, the City standard for response distance from a fire station is 1.5 miles.⁷ This is consistent with the specifications for response distances within the LAMC, discussed below.

(c) City of Los Angeles General Plan Safety Element

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

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

⁷ *City of Los Angeles General Plan Framework Element, p. 9-5.*

nearest disaster route to the Project Site is Lincoln Boulevard, located approximately 900 feet west of the Project Site.⁸

(d) Palms–Mar Vista–Del Rey Community Plan

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project Site is located within the Palms–Mar Vista–Del Rey Community Plan area. The Palms–Mar Vista–Del Rey Community Plan (Community Plan), adopted on September 16, 1997, and most recently amended on September 7, 2016, includes the following objective and policies that are relevant to fire protection:

- Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.
- Policy 9-1.1: Coordinate with the Fire Department and review of significant development projects and General Plan amendments affecting land use to determine the impact on service demands.
- Policy 9-1.2: Encourage the Fire Department to locate fire service facilities in appropriate locations throughout the community to maintain safety.

(e) Los Angeles Municipal Code

The LAMC includes provisions for new construction projects within the City. The LAMC contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code) of the LAMC 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.⁹

LAMC Section 57.106.5.2 specifically provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and

⁸ *City of Los Angeles General Plan Safety Element, Exhibit H, adopted by the City Council, November 26, 1996.*

⁹ *LAMC Article 7, Chapter 5, Former Article 7 Repealed and Replaced by Ordinance Number 182,822, effective January 10, 2014, known as the Los Angeles Fire Code. This version of the Los Angeles Fire Code incorporates by reference portions of the 2013 edition of the California Fire Code and the 2012 edition of the International Fire Code.*

(5) hazardous materials/waste. In addition, LAMC Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

The LAMC also addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute in low density residential areas to 12,000 gallons per minute in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds per square inch remaining in the water system. As determined by the LAFD in their written correspondence included in Appendix H of this Draft EIR, the Project would be considered under the Industrial and Commercial category, which has a minimum required fire flow of 6,000 to 9,000 gallons per minute from four to six hydrants flowing simultaneously.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses considered under the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on Table 57.507.3.3 provided in LAMC Section 57.507.3.3, the maximum response distance for land uses in the Industrial and Commercial category from fire stations with an engine company is 1 mile and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

(f) City of Los Angeles Propositions

The City Fire Facilities Bond (Proposition F), approved by voters in November 2000, allocated \$378.6 million to build 19 new or replacement neighborhood fire/paramedic stations.¹⁰ The Proposition F—Fire Facilities Bond Team oversees allocation of funds and consists of the LAFD, the Bureau of Engineering, and Bovis Lend Lease. The team identified numerous projects to upgrade fire facilities including construction of new training centers, replacing and constructing new fire stations, and building a new Air Operations Helicopter Facility and General Services Helicopter Fleet Maintenance Building.

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involves the spending of \$600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities.¹¹ Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, replacement of one new police station and jail, construction of two bomb squad facilities, construction of one new Metro detention center, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of one new Valley Traffic Division and Bureau Headquarters, renovation of fire facilities, and renovation of police facilities.¹²

Measure J, which was approved by voters at the November 7, 2006, election, is a Charter amendment and ordinance that involves technical changes to Proposition F. Under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations was required to take place on single sites of at least 2 acres. Measure J allows new regional fire stations funded by Proposition F and located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres.

(g) Los Angeles Fire Department Strategic Plan 2018–2020¹³

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to

¹⁰ City of Los Angeles Department of Public Works, Bureau of Engineering, *Proposition F, Facilities Bond*, www.eng.lacity.org/fire_bond, accessed September 26, 2017.

¹¹ City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, *City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014*.

¹² City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, *City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014*.

¹³ LAFD, *Strategic Plan 2018–2020*.

accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development. With implementation of specific strategies, the Strategic Plan 2018–2020 will also align its progress with City of Los Angeles Mayor Eric Garcetti's four priority outcomes to provide a safe city, a well-run city government, a livable and sustainable city, and a prosperous city.

b. Existing Conditions

(1) Fire Protection Services, and Facilities

The LAFD serves as the City's life safety agency with approximately 3,246 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across the LAFD's 471-square-mile jurisdiction. At any given time, a total of 1,018 firefighters, including 270 paramedics, are on 24-hour duty. In addition, the LAFD is supported by 353 technical and administrative personnel.¹⁴

As provided in Figure IV.I.1-1 on page IV.I.1-9, the LAFD has identified five fire stations located in the vicinity of the Project Site that could provide fire protection services to the Project Site. Fire Station No. 63 located at 1930 Shell Avenue is approximately 1.4 miles northwest of the Project Site and is the closest station to the Project Site. Fire Station No. 63 is the designated "first in" station to the Project Site.¹⁵ As shown in Table IV.I.1-1 on page IV.I.1-10, Fire Station No. 63 consists of a task force truck and engine company, a paramedic rescue ambulance, and 12 staff. Secondary fire stations that could serve the Project Site include Fire Station No. 67, which is located approximately 1.7 miles south of the Project Site at 5451 Playa Vista Drive.¹⁶ Fire Station No. 67 is equipped with an assessment engine, a basic life support rescue ambulance, and 12 staff.

The LAFD has identified three additional fire stations beyond a 2-mile radius of the Project Site that could be available to provide fire protection services to the Project Site.

¹⁴ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed February 7, 2019.

¹⁵ LAFD, *FireStatLA*, www.lafd.org/fsla/stations-map, accessed October 25, 2017.

¹⁶ LAFD, *FireStatLA*, www.lafd.org/fsla/stations-map, accessed October 25, 2017.

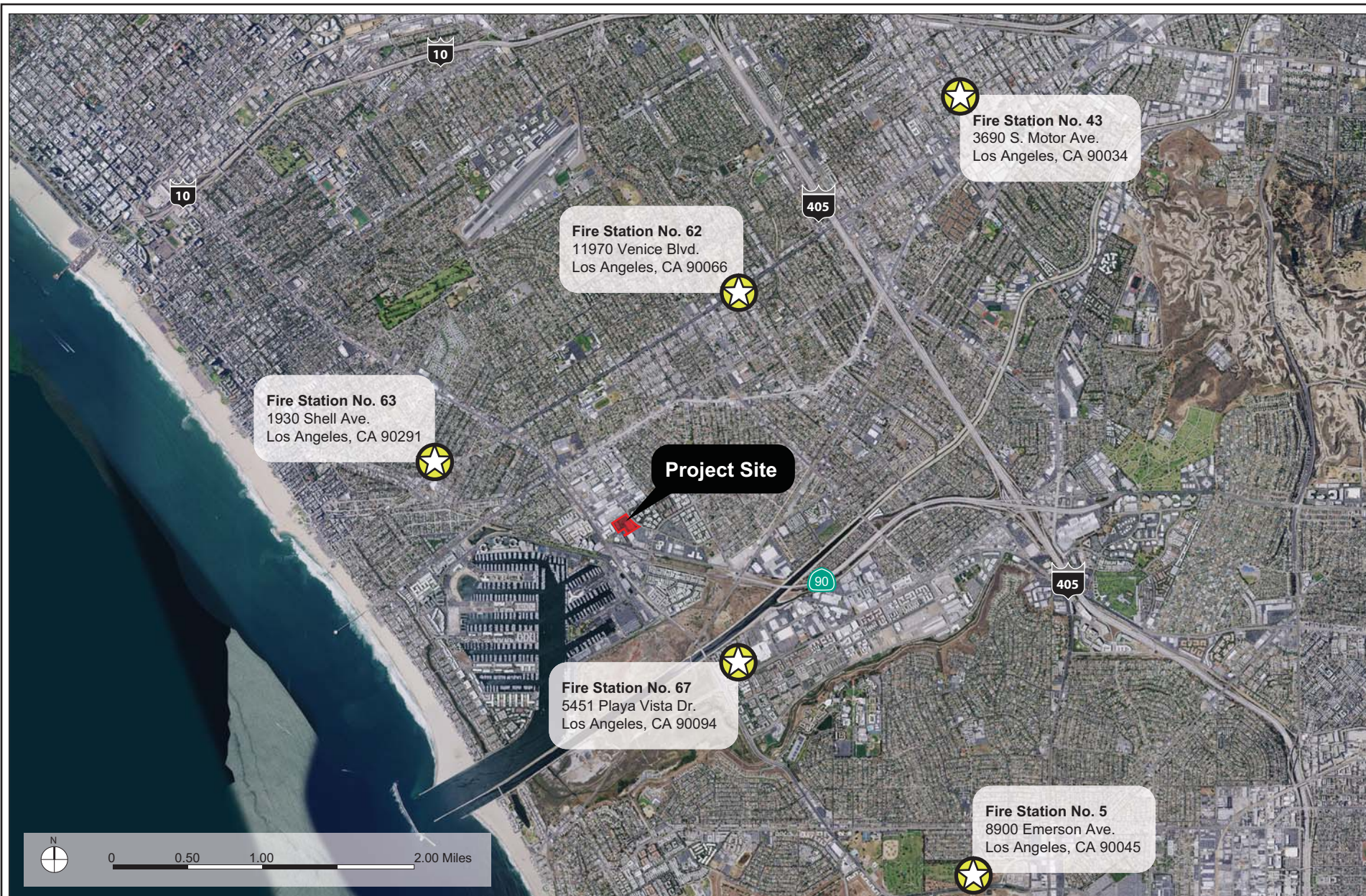


Figure IV.I-1
Fire Stations in the Vicinity of the Project Site

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

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 63 1930 Shell Ave. Los Angeles, CA 90291	1.4 miles	<ul style="list-style-type: none"> • Task Force Truck and Engine Company • Paramedic Rescue Ambulance 	• 12 staff
Fire Station No. 67 5451 Playa Vista Dr. Los Angeles, CA 90094	1.7 miles	<ul style="list-style-type: none"> • Assessment Engine • BLS Rescue Ambulance 	• 12 staff
Fire Station No. 62 11970 Venice Blvd. Los Angeles, CA 90066	2.2 miles	<ul style="list-style-type: none"> • Single Engine Company • EMT Rescue Ambulance 	• 6 staff
Fire Station No. 5 8900 Emerson Ave. Los Angeles, CA 90045	3.6 miles	<ul style="list-style-type: none"> • Task Force Truck and Engine Company • Paramedic Rescue Ambulance • Battalion 4 Headquarters 	• 14 staff
Fire Station No. 43 3690 S. Motor Ave. Los Angeles, CA 90034	3.9 miles	<ul style="list-style-type: none"> • Single Engine Company • Paramedic Rescue Ambulance 	• 6 staff
<hr/> <i>Source: Correspondence with LAFD, Ralph M. Terrazas, Fire Chief, August 28, 2017.</i>			

Fire Station No. 62, which is located approximately 2.2 miles north of the Project Site at 11970 Venice Boulevard, is equipped with a single engine company, an EMT rescue ambulance, and a staff of six. Fire Station No. 5, which is located approximately 3.6 miles southeast of the Project Site at 8900 Emerson Avenue,¹⁷ is equipped with a task force truck and engine company, a paramedic rescue ambulance, 14 staff, and serves as the Battalion 4 headquarters. Fire Station No. 43, which is located approximately 3.9 miles northeast of the Project Site at 3690 South Motor Avenue,¹⁸ is equipped with a single engine company, a paramedic rescue ambulance, and a staff of six.

The response times shown in Table IV.I.1-2 on page IV.I.1-11 are provided for informational purposes since LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.¹⁹ Roadway congestion, intersection level of service (LOS),

¹⁷ LAFD, FireStatLA, www.lafd.org/fsla/stations-map, accessed October 25, 2017.

¹⁸ LAFD, FireStatLA, www.lafd.org/fsla/stations-map, accessed October 25, 2017.

¹⁹ NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 (Footnote continued on next page)

**Table IV.I.1-2
Average Emergency Medical Service and Structure Fire Response Times**

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 63	4:28	4:36
Fire Station No. 67	5:03	4:36
Fire Station No. 62	4:31	4:30
Fire Station No. 5	5:10	5:25
Fire Station No. 43	3:59	4:12
<p>^a Response times are based on January 2018–September 2018 data.</p> <p>Source: LAFD, FireStatLA, Fire Station 63 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=591&year=2018, accessed February 25, 2019; LAFD, FireStatLA, Fire Station 67 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=611&year=2018, accessed February 25, 2019; LAFD, FireStatLA, Fire Station 62 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=586&year=2018, accessed February 25, 2019; LAFD, FireStatLA, Fire Station 5 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=296&year=2018, accessed February 25, 2019; and LAFD, FireStatLA, Fire Station 43 Response Metrics for 2018, www.lafd.org/fsla/stations-map?st=506&year=2018, accessed February 25, 2019.</p>		

weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.²⁰ The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.²¹ Although response times can be considered to assess the adequacy of fire protection and emergency medical services, LAFD utilizes a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847 ruling, the City is meeting its

Edition. Response time is turnout time plus travel time for emergency medical service and fire suppression incidents.

²⁰ LADOT, Los Angeles Signal Synchronization Fact Sheet.

²¹ LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by three shopping center buildings that together comprise approximately 100,781 square feet. Vehicular access to the Project Site, including emergency access, is located along Maxella Avenue and Glencoe Avenue.

(3) Fire Water Infrastructure

As discussed in Section IV.L.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC). Based on the Utility Report included in Appendix O of this Draft EIR, water service is currently provided to the Project Site via a 12-inch water main in Maxella Avenue, a 12-inch line in Glencoe Avenue, and an 8-inch line that runs along the southeastern portion of the Project Site. In addition, there are currently six existing fire hydrants located within 400 feet of the Project Site boundary, including two hydrants along Maxella Avenue and four hydrants on Glencoe Avenue. All six hydrants are served by existing 6-inch water lines.²²

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.²³ Therefore, the Project Site is not located within a fire hazard area.

²² Fuscoe Engineering, *Paseo Marina—Water and Sewer Infrastructure Assessment Report*, March 3, 2017.

²³ City of Los Angeles Department of City Planning, *ZIMAS, Parcel Profile Report*, <http://zimas.lacity.org/>, accessed October 25, 2017.

3. Project Impacts

a. Thresholds of Significance

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

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

For this analysis, the Appendix G Threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold question.

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate fire protection:

- A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

b. Methodology

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

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities would be needed. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

c. Analysis of Project Impacts

(1) Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant would implement a work site traffic control plan that would include provisions for maintaining emergency access to the Project Site during construction.

(2) Project Impacts

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

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal

Regulations, Part No. 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration.²⁴ Additionally, in accordance with the provisions of the Occupational Safety and Health Administration, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.²⁵ Construction of the Project 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 construction activities associated with the Project to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction of the Project could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, as discussed in Section IV.J, Transportation/Traffic, 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 temporary lane closures, roadway/access improvements, and the construction of utility line connections. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, a work site traffic control plan would also be implemented during construction of the Project pursuant to Project Design Feature TR-PDF-1 in Section IV.J, Transportation/Traffic, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Construction activities would also generate 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, Project construction activities could temporarily impact emergency access along Lincoln Boulevard, and other main connectors due to

²⁴ 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, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed September 26, 2017.

²⁵ 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, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed September 26, 2017.

travel time delays caused by traffic during the Project's construction phase. However, as discussed in Section IV.J, Transportation/Traffic, of this Draft EIR, construction of the Project would generate fewer trips than the trips generated by the existing uses. In addition, construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. The 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 potentially 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 right-of-ways. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, construction of the Project would not require a new fire station or the expansion of an existing facility in order to maintain service. Therefore, impacts to fire protection services during construction of the Project would be less than significant, and no mitigation measures are required.

(b) Operation

(i) Facilities and Equipment

As detailed above in the Regulatory Framework discussion, pursuant to Section 57.507.3.3 of the LAMC, land uses in the Industrial and Commercial category, such as the Project, require a response distance of 1 mile from a fire station with an engine company and a response distance of 1.5 miles from a fire station with a truck company. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. As discussed above, Fire Station No. 63, which would serve as the "first-in" fire station to the Project Site, is located approximately 1.4 miles northwest of the Project Site, and is equipped with a task force truck and engine company, a paramedic rescue ambulance, and 12 staff. Based on the Project's categorization as an Industrial and Commercial land use and distance from the nearest fire station (1.4 miles), the Project would be located outside of the required 1-mile response distance from a fire station with an engine company but would be located within the 1.5-mile response distance from a fire station with a truck company. Therefore, as stipulated in Section 57.507.3.3 of the LAMC, the Project would be required to construct all structures with automatic fire sprinkler systems.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by three shopping center-related buildings that together comprise

approximately 100,781 square feet. Since the Project Site does not contain any housing units, there are currently no residents on the Project Site that would require LAFD fire protection services. The existing commercial uses generate a daytime employee population of approximately 273 employees.²⁶

The Project would include the development of 658 new multi-family residential units and up to 27,300 square feet of neighborhood-serving retail and restaurant uses, which would generate new residential and employee populations in the service area of Fire Station No. 67. Development of 658 multi-family residential units would result in a net increase of approximately 1,599 residents.²⁷ In addition, the Project's commercial uses would generate approximately 73 employees.²⁸ Overall, the Project would generate an on-site fire service population of approximately 1,399 net new persons (residents and employees). Therefore, the Project's population would increase the demand for LAFD fire protection services.

The proposed uses would be expected to generate a range of fire service calls similar to other such uses, including kitchen/house fires, garbage bin fires, car fires, electrical fires, etc. These types of fires would be adequately suppressed with the fire equipment typically found at fire stations. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment typically found at fire stations.

Additionally, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as set forth in the written correspondence from the LAFD included in Appendix H of this Draft EIR. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

²⁶ Based on the employee generation rate for "Neighborhood Shopping Center" land uses as provided by the Los Angeles Unified School District, 2016 Developer Fee Justification Study, Table 15, March 2017, the rate of 0.00271 employees per square foot is applied.

²⁷ Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimates (2012–2016) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 22, 2018.

²⁸ Based on the employee generation rate for "Neighborhood Shopping Center" land uses as provided by the Los Angeles Unified School District, 2016 Developer Fee Justification Study, Table 15, March 2017, the rate of 0.00271 employees per square foot is applied.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the General Plan Safety Element, and the Palms–Mar Vista–Del Rey Community Plan, as listed in the Regulatory Framework discussion above, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 9-1.1 of the Palms–Mar Vista–Del Rey Community Plan), and coordinate the development of new fire facilities to be phased with growth (refer to Objective 9.18 of the Framework Element). **Given these procedures and policy directives, as well as LAFD's continued evaluation of existing fire facilities, Project impacts with regard to LAFD facilities and equipment would be less than significant.**

(ii) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, to the Project Site would be provided via five driveways. Emergency vehicles could also access the Project Site via the east–west paseo off Glencoe Avenue. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access as set forth in the written correspondence from the LAFD included in Appendix H of this Draft EIR. Additionally, the area surrounding the Project Site includes an established 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 Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Furthermore, drivers of emergency vehicles can avoid traffic by using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. **Overall, emergency access to the Project Site and**

surrounding area would be maintained, and impacts with regard to emergency access would be less than significant.

(iii) Fire Flow

As discussed in Section IV.L.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 LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Appendix H of this Draft EIR, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 gallons per minute to 9,000 gallons per minute from four to six adjacent fire hydrants flowing simultaneously with a minimum residual water pressure of 20 pounds per square inch remaining in the water system. As discussed in the Utility Report, a Service Advisory Request application was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. LADWP has indicated that the existing public water system would provide adequate water pressure for both fire and domestic services with more than the required residual pressure of 20 pounds per square inch available in the water system.

Additionally, as set forth in LAMC Section 57.507.3.2, land uses considered under the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. As previously described, there are currently six existing fire hydrants located within 400 feet of the Project Site. Two hydrants are located along Maxella Avenue and four hydrants are located on Glencoe Avenue. Based on consultation with LADWP, LADWP's initial review of the Project determined that [no] additional fire hydrants would be required to provide adequate fire coverage. If later required by the LAFD during their fire/life safety plan review, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

Based on the above, LADWP would be able to supply sufficient flow and pressure to satisfy the Project's fire suppression needs. Therefore, the Project would meet fire flow requirements, and impacts with regard to fire flow would be less than significant.

(iv) Conclusion

Based on the analysis above, operation of the Project would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Additionally, as concluded in the written correspondence from the LAFD included in Appendix H of this Draft EIR, with the implementation of the recommendations set forth therein along with any additional recommendations that could be made during later reviews of the Project as part of the normal building permit process, potential impacts to fire protection services would be addressed. **Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Impacts to fire protection services during operation of the Project would be less than significant, and no mitigation measures are required.**

d. Cumulative Impacts

The geographic context for the cumulative impact analysis for fire protection services is the service areas of Fire Station Nos. 63, 67, 62, 5, and 43. The Project, in conjunction with growth forecasted in the City through 2023 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2023 includes 39 known development projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR.

A number of the identified related projects and ambient growth projections would fall within the service areas of Fire Station Nos. 63, 67, 62, 5, and 43. The increase in development and service populations from the Project and related projects would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects would be reviewed by the LAFD on a project-by-project basis to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection. Furthermore, each related project would be required to comply with regulatory requirements related to fire protection. Additionally, the Project and each related project would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current standards for the type and intensity of land uses involved. The Project and related projects also would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout

the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time, as appropriate.

Based on the above, the Project's contribution to cumulative impacts to fire protection would not be cumulatively considerable. As such, cumulative impacts on fire protection would be less than significant.

e. Mitigation Measures

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

f. Level of Significance After Mitigation

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