

## **IV. Environmental Impact Analysis**

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### **K.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 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 Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, from the LAFD Bureau of Fire Prevention and Public Safety (December 11, 2020) included in Appendix L, and the *Utility Technical Report: Water, Wastewater, and Energy*, prepared for the Project by KPFF Consulting Engineers, February 2021 (Utility Report), which is included in Appendix S.2 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 (OSHA and CalOSHA), respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of OSHA 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 [CCR], 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 (CCR, 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 2019 edition of the California Building Code became effective on January 1, 2020.<sup>1</sup> 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 2019 California Fire Code also went into effect on January 1, 2020.<sup>2</sup> 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 (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.<sup>3</sup> This section of the CVC states the following:

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

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<sup>1</sup> California Building Code (CCR, Title 24, Part 2).

<sup>2</sup> California Fire Code, (CCR, Title 24, Part 9).

<sup>3</sup> 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.

*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.<sup>4</sup> 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.”<sup>5</sup>

## (2) City of Los Angeles

### *(a) City of Los Angeles Charter*

Section 520 of the City’s Charter states that the LAFD’s duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City, as well as to

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

<sup>5</sup> *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

conduct fire investigations and protect lives and property in case of disaster or public calamity.

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

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City 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 services, and infrastructure.<sup>6</sup> 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 services, 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's 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.<sup>7</sup> 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 Safety Element designates disaster routes. The nearest designated disaster route to the Project Site is Sunset Boulevard, which is adjacent to the Project Site.<sup>8</sup>

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

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

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

*(d) Central City North Community Plan*

As discussed in Section IV.H, Land Use and Planning, of this Draft EIR, the Project Site is located within the Central City North Community Plan area. The Central City North Community Plan (Community Plan), adopted on December 15, 2000, includes the following objectives and policies that are relevant to fire protection:

- Objective 9-1: Ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City North.
  - Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine impact on service demands.
  - Policy 9-1.2: Encourage the Fire Department to locate fire services facilities in appropriate locations throughout the community in order 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 Safety Element. LAMC Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code) sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials.<sup>9</sup>

Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. 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

<sup>9</sup> Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.

fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable.

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 (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. As determined by the LAFD, the required fire water flow for the Project has been set at 9,000 gpm from four to six hydrants flowing simultaneously with a residual pressure of 20 psi, which corresponds to the Industrial and Commercial land use category.<sup>10</sup>

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. As stated above, the Project would be considered under the Industrial and Commercial category, and therefore would require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch double fire hydrants 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. If required by the LAFD, 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.

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 the Project (Industrial and Commercial land use 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. LAMC Section 57.409 addresses emergency planning and evacuation requirements for high-rise buildings, including the creation and filing of an emergency plan; LAFD approval of emergency plans,

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<sup>10</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations.<sup>11</sup> The LAMC classifies high-rises as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access. As set forth in LAMC Section 57.409, all emergency plans, procedures, and evacuation signs must be completed and submitted to the LAFD for inspection and approval prior to implementation. Additionally, LAMC Section 57.409.8.3 requires emergency evacuation signs to be posted in elevator lobbies and adjacent to the doorway leading to the exit stairs. LAMC Section 57.409.9.3 requires residential high-rise buildings to conduct mandatory fire drills at least annually under the direction of a designated Fire Safety Director. In addition, LAMC Section 57.4705 addresses specific fire safety requirements for new high-rises, including those related to an elevator system, vertical exit enclosures, portable fire extinguishers in each residential occupancy unit, and standby power for window washing equipment. In accordance with LAMC Section 57.4705.1.6, at least one elevator in each bank of elevators must be available for fire emergency service. LAMC Section 57.4705.1.7 further requires that at least one elevator car serving all building levels must be available for emergency use. Any new high-rise building must also include an automatic sprinkler system.

LAMC Section 57.4705.4 requires all high-rise buildings to provide a rooftop emergency helicopter landing facility (EHLF), unless certain life safety features, as specified in LAFD Requirement No. 10, are provided and approved by the Fire Marshal in compliance with two options.<sup>12</sup> Option 1 (EHLF Equivalency—HTLA) pertains to the provision of a Helicopter Tactical Landing Area (HTLA) in lieu of the emergency helicopter landing facility. An HTLA is defined by the LAFD as a “designated load bearing area with dimensions that will be less than those required for the load bearing area of an EHLF but with sufficient safety area around the HTLA to provide clearance for the helicopter.” LAFD Regulation No. 10 specifies HTLA and life safety feature requirements under different high-rise building height categories: over 75 feet, but less than 120 feet; over 120 feet, but less than 240 feet; over 240 feet, but less than 420 feet; and over 420 feet, but less than 1,000 feet. For Option 1, life safety features include:

- Two Fire Service Access Elevators
- Two stairways with roof access
- Enclosed elevator lobbies

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<sup>11</sup> *The LAMC classifies high-rise buildings as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access.*

<sup>12</sup> *Los Angeles Fire Department, Office of the Fire Marshal, Los Angeles Fire Department Requirement No. 10: Emergency Helicopter Landing Facilities (EHLF) Requirements, revised November 17, 2014.*

- Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor

Option 2 (EHLF Equivalency—No EHLF and No HTLA) applies when all life safety elements included in Option 1 have been provided along with additional life safety features included in Option 2. For Option 2, the additional life safety features include:

- An automatic sprinkler system installed throughout the high-rise building. In light and ordinary hazard areas, other than parking garages, listed quick-response sprinklers, including extended coverage quick-response sprinklers, shall be used throughout the system. The National Fire Protection Agency (NFPA) 13 reduction to the hydraulic design area of operation for quick-response sprinkler systems shall not be permitted. Note: To meet the intent of this life safety feature it will typically require larger size branch lines for the automatic sprinkler system with quick response sprinkler heads.
- A Video Camera Surveillance System with cameras located in all Fire Service Access Elevator Lobbies and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft. LAFD video surveillance shall be usable from the LAFD's "fire control room" and installed with system cabling "survivability" requirements similar to NFPA Standard 72 for fire alarm systems. System cameras are required to be active during a fire alarm condition within the building.
- For high-rise buildings over 420 feet: egress stairways with a capacity, in inches, calculated by multiplying the occupant load served by a means of egress capacity factor of 0.3 inch per person. However, the capacity shall not be less than specified elsewhere in the building and fire codes.

*(f) City of Los Angeles Propositions*

Proposition F, the City Fire Facilities Bond, approved by voters in November 2000, allocated \$378.6 million to build 19 new or replacement neighborhood fire/paramedic stations.<sup>13</sup> The Proposition F Fire Facilities Bond Team consists of the LAFD, the City Bureau of Engineering, and a contracting firm Bovis Lend Lease. This team oversees allocation of the funds and has 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

<sup>13</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, [https://eng.lacity.org/fire\\_bond](https://eng.lacity.org/fire_bond), accessed November 3, 2020.

Maintenance Building.<sup>14</sup> As reported in November 2019, BOE completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.<sup>15</sup>

Of the stations nearest to the Project Site, as discussed below, Fire Station No. 4 located at 800 North Main Street was replaced by a new station located at 450 East Temple Street. The previous Fire Station No. 4 was overcrowded and had antiquated main systems. The new station enhances LAFD's ability to provide adequate emergency response in the service area, which encompasses a 2-mile radius around the station. The 2-mile service area radius, which is the maximum desired travel distance for LAFD truck company services for neighborhood land uses, encompasses Downtown Los Angeles (generally bounded by Dodger Stadium and Elysian Park to the north, South Union Avenue to the west, East Washington Boulevard to the south, and North Evergreen Avenue to the east) and is within 1.5 miles of the Project Site.<sup>16</sup>

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 public safety (police, fire, paramedic) facilities.<sup>17</sup> Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five police stations, replacement of one police station and jail, construction of two bomb squad facilities, replacement of one jail, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of the Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities.<sup>18</sup> As part of Proposition Q, the renovation of 80 fire stations was completed in May 2014.<sup>19</sup>

<sup>14</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, *Proposition F, Facilities Bond*, [www.eng.lacity.org/fire\\_bond](http://www.eng.lacity.org/fire_bond), accessed November 3, 2020.

<sup>15</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, *Newsletter No. 20-5*, November 6, 2019.

<sup>16</sup> City of Los Angeles Citywide General Plan Framework EIR, *Fire/Emergency Medical Services, Figure F-3 Fire Department Truck Company Service Areas for Neighborhood Land Uses in the City of Los Angeles*, January 19, 1995.

<sup>17</sup> 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*.

<sup>18</sup> 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*.

<sup>19</sup> 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*.

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 2018–2020<sup>20</sup>*

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 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 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 3,435 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 469-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 381 technical and administrative personnel.<sup>21</sup>

As shown in Figure IV.K.1-1 on page IV.K.1-11, there are three LAFD fire stations located within a 2-mile radius of the Project Site. The closest station to the Project Site is

<sup>20</sup> LAFD, *Strategic Plan 2018–2020*.

<sup>21</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed November 3, 2020



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

Fire Station No. 3, which is the designated “first-in” station, located approximately 0.7 mile southwest of the Project Site at 108 North Fremont Avenue.<sup>22</sup> As provided by the LAFD and summarized in Table IV.K.1-1 on page IV.K.1-13, Fire Station No. 3 consists of a task force (includes an aerial ladder fire engine/truck company and two single engines), a paramedic rescue ambulance, a basic life support (BLS) rescue ambulance, an emergency lighting unit, a command post vehicle, a medical supply trailer, a back-up Urban Search and Rescue (US&R) apparatus, and a staff of 16.<sup>23</sup>

Secondary fire stations that serve the Project Site include Fire Station No. 20, which is located approximately 1.4 miles northwest of the Project Site at 2144 Sunset Boulevard and Fire Station No. 4, which is located approximately 1.5 miles southeast of the Project Site at 450 East Temple Street.<sup>24</sup> Fire Station No. 20 consists of an assessment light force, a paramedic rescue ambulance, a BLS rescue ambulance, and a staff of 10. Fire Station No. 4 consists of an assessment engine, a paramedic rescue ambulance, an emergency medical services (EMS) Battalion Captain, a BLS rescue ambulance, and a staff of nine.<sup>25</sup>

The LAFD also identified two additional fire stations beyond a 2-mile radius of the Project Site that could serve the Project Site. Fire Station No. 11, which is located approximately 2.1 miles west of the Project Site at 1819 West 7th Street, consists of an assessment engine, a paramedic rescue ambulance, a BLS rescue ambulance, a light force, and a staff of 14.<sup>26</sup> Fire Station No. 9, located approximately 2.4 miles south of the Project Site at 430 East 7th Street, consists of two assessment engines, a BLS truck, two paramedic rescue ambulances, a BLS rescue ambulance, a fast response unit, and as staff of 22.<sup>27</sup>

The response times for January 2019 to November 2019 are shown in Table IV.K.1-2 on page IV.K.1-14. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA)

<sup>22</sup> LAFD, *Find Your Station*, [/www.lafd.org/fire-stations/station-results](http://www.lafd.org/fire-stations/station-results), accessed November 3, 2020.

<sup>23</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

<sup>24</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

<sup>25</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

<sup>26</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

<sup>27</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

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

<b>Station No., Location, and Community Served</b>	<b>Distance from Project Site</b>	<b>Equipment</b>	<b>Staffing</b>
Fire Station No. 3 108 N. Fremont Ave. Los Angeles, CA 90012	0.7 mile	<ul style="list-style-type: none"> <li>• Task Force</li> <li>• Paramedic Rescue Ambulance</li> <li>• BLS Rescue Ambulance</li> <li>• Emergency Lighting Unit</li> <li>• Command Post Vehicle</li> <li>• Medical Supply Trailer</li> <li>• Back-up US&amp;R Apparatus</li> </ul>	• 16 staff
Fire Station No. 20 2144 Sunset Blvd. Los Angeles, CA 90026	1.4 mile	<ul style="list-style-type: none"> <li>• Assessment Light Force</li> <li>• Paramedic Rescue Ambulance</li> <li>• BLS Rescue Ambulance</li> </ul>	• 10 staff
Fire Station No. 4 450 E. Temple St. Los Angeles, CA 90012	1.5 mile	<ul style="list-style-type: none"> <li>• Assessment Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• EMS Battalion Captain</li> <li>• BLS Rescue Ambulance</li> </ul>	• 9 staff
Fire Station No. 11 1819 W. 7th St. Los Angeles, CA 90057	2.1 miles	<ul style="list-style-type: none"> <li>• Assessment Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• BLS Rescue Ambulance</li> <li>• Light Force</li> </ul>	• 14 staff
Fire Station No. 9 430 E. 7th St. Los Angeles, CA 90014	2.4 miles	<ul style="list-style-type: none"> <li>• 2 Assessment Engines</li> <li>• BLS Truck</li> <li>• 2 Paramedic Rescue Ambulances</li> <li>• BLS Rescue Ambulance</li> <li>• Fast Response Unit</li> </ul>	• 22 staff
<p><i>Source: Correspondence with Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.</i></p>			

standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.<sup>28</sup>

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

<sup>28</sup> NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for emergency medical service and fire suppression incidents.

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

<b>Station</b>	<b>Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)</b>	<b>Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)</b>
Fire Station No. 3	6:42	5:42
Fire Station No. 20	6:32	5:57
Fire Station No. 4	6:27	6:06
Fire Station No. 11	6:04	5:19
Fire Station No. 9	6:02	5:40
<p><sup>a</sup> Response times are based on January 2020–September 2020 data.</p> <p>Source: LAFD: FireStatLA, Station 3 Response Metrics for January–September 2020, <a href="http://www.lafd.org/fsla/stations-map?station=3&amp;year=2020">www.lafd.org/fsla/stations-map?station=3&amp;year=2020</a>, accessed November 3, 2020; FireStatLA, Station 20 Response Metrics for January–September 2020, <a href="http://www.lafd.org/fsla/stations-map?station=20&amp;year=2020">www.lafd.org/fsla/stations-map?station=20&amp;year=2020</a>, accessed November 3, 2020; FireStatLA, Station 4 Response Metrics for January–September 2020, <a href="http://www.lafd.org/fsla/stations-map?station=4&amp;year=2020">www.lafd.org/fsla/stations-map?station=4&amp;year=2020</a>, accessed November 3, 2020; FireStatLA, Station 11 Response Metrics for January–September 2020, <a href="http://www.lafd.org/fsla/stations-map?station=11&amp;year=2020">www.lafd.org/fsla/stations-map?station=11&amp;year=2020</a>, accessed November 3, 2020; FireStatLA, Station 9 Response Metrics for January–September 2020, <a href="http://www.lafd.org/fsla/stations-map?station=9&amp;year=2020">www.lafd.org/fsla/stations-map?station=9&amp;year=2020</a>, accessed November 3, 2020.</p>		

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.<sup>29</sup> The City has over 205 miles of major arterial routes that are equipped with FPS.<sup>30</sup>

According to the LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's 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, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire

<sup>29</sup> LADOT, *Los Angeles Signal Synchronization Fact Sheet*.

<sup>30</sup> LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, Bulletin No. 133, October 2008.

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, vehicular access, including emergency vehicle access, to the Project Site is currently available via driveways along White Knoll Drive and Alpine Street.

## (3) Fire Water Infrastructure

As discussed in the Utility Report, included as Appendix S.2 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 (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via LADWP water lines within adjacent streets. Specifically, according to the Utility Report, there is an 8-inch water main along Sunset Boulevard, a 31-inch and an 8-inch water main along Beaudry Avenue, and an 8-inch water main along White Knoll Road. In addition, there are eight existing LADWP fire hydrants surrounding the Project Site. There are three fire hydrants located on Sunset Boulevard; one at the northeast intersection of White Knoll Drive, one at the southeast corner of the intersection with Beaudry Avenue, and one at the northwestern side of Sunset Boulevard across the Project Site. There are three more hydrants on Beaudry Avenue; two at the two intersections of Alpine Street and one at the intersection of Bartlett Street. The other two hydrants are located on White Knoll Drive, at the northwest corner of the intersection of Marview Avenue and at the northwest intersection of White Knoll Drive.

## (4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.<sup>31</sup> Therefore, the Project Site is not located within a fire hazard area.<sup>32</sup>

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<sup>31</sup> *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 1111 W. Sunset Boulevard, <http://zimas.lacity.org/>.*

<sup>32</sup> *Refer to Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of wildfire impacts.*

### (5) Reorganization by the LAFD<sup>33</sup>

In January 2015, the LAFD initiated a major reorganization of the Department's Emergency Services Bureau, creating four distinct geographic bureaus, each with a Deputy Chief reporting directly to the LAFD Chief Deputy of Emergency Operations. The objective of this reorganization was for each new Bureau Commander and their staff to establish a more effective and responsive business model than was previously possible through the traditional rotating shift, platoon duty system. The bureaus were organized to operate during normal weekday business hours and allow bureau commanders and staff to be available 24 hours each day to respond to significant emergencies.

As the LAFD has established an organizational model aligned with that of the LAPD, the four bureaus include Central Bureau (at Fire Station No. 3), South Bureau (at San Pedro City Hall complex), Valley Bureau (at Fire Station No. 88), and West Bureau (at Fire Station No. 82 Annex). The new four-bureau system, similar to that of the LAPD, makes the LAFD more effective and responsive to community needs.

## 3. Project Impacts

### a. Thresholds of Significance

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

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

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

<sup>33</sup> LAFD Implements New Bureau Command Structure, January 12, 2015, <http://lafd.org/news/lafd-implements-new-bureau-command-structure>, accessed November 3, 2020.

- 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 and emergency medical services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's 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 an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is reasonably foreseeable direct or indirect effect of the project. There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire and emergency facilities, that in the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration.

## **c. Project Design Features**

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.L, Transportation, of this Draft EIR, pursuant to Project Design

Feature TR-PDF-1, the Project would implement a construction management plan that would include provisions for maintaining emergency access to the Project Site during construction.

## d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. Both development scenarios are evaluated in the following analysis.

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

### (1) Impact Analysis

#### (a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 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 OSHA.<sup>34</sup> Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on site.<sup>35</sup> Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing 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.L, Transportation, of this Draft EIR, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on White Knoll Drive, Alpine Street, Beaudry Avenue, and Sunset Boulevard. 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 Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.L, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Construction activities would also generate 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. However, with implementation of Project Design Feature TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M.

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<sup>34</sup> *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, [www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10671](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671), accessed November 3, 2020.*

<sup>35</sup> *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, [www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10671](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671), accessed November 3, 2020.*

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 interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

**Based on the above, 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 during Project construction would be less than significant.**

*(b) Operation*

*(i) Facilities and Equipment*

The Project Site would continue to be served by Fire Station No. 3, which is the designated “first-in” station for the Project Site, located approximately 0.7 mile southwest of the Project Site at 108 North Fremont Avenue. As provided by the LAFD and summarized in Table IV.K.1-1 on page IV.K.1-13, Fire Station No. 3 is equipped with a task force (includes an aerial ladder fire engine/truck company and two single engines), a paramedic rescue ambulance, a BLS rescue ambulance, an emergency lighting unit, a command post vehicle, a medical supply trailer, a back-up US&R apparatus, and a staff of 16. As such, based on the LAMC criteria regarding response distance, the Project Site is located within the required 1-mile response distance from a fire station with an engine company and within the 1.5 miles response distance from a fire station with a truck company. In addition, the LAFD has determined fire protection (based on the response distance from existing fire stations criteria) to be adequate.<sup>36</sup>

The Mixed Use Development Scenario is anticipated to generate approximately 2,359 persons on-site, including 1,777 residents<sup>37</sup> and 582 employees.<sup>38</sup> The No-Hotel

<sup>36</sup> Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, December 11, 2020.

<sup>37</sup> Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

Development Scenario is anticipated to generate approximately 2,486 persons, including 1,994 residents<sup>39</sup> and 492 employees.<sup>40</sup> As such, the No-Hotel Development Scenario is anticipated to generate a greater number of persons on-site. It is noted, however, that the Mixed Use Development Scenario would generate a greater overall visitor population associated with the proposed hotel and additional commercial uses not proposed under the No-Hotel Development Scenario.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied with four vacant buildings and the Elysian apartment building, which is on the Project Site, but not part of the Project. Given that most of the buildings within the Project Site are vacant, the Project Site currently generates a low demand for LAFD fire protection services. The Project would increase the building area and daytime population of the Project Site compared to existing conditions. As such, the Project 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. 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 found at the fire stations nearest the Project Site.

As described in Section II, Project Description, of this Draft EIR, the Project would include buildings ranging in height from 91 feet to 572 feet. Thus, the Project is required by

<sup>38</sup> Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.5 employee per room for “Hotel” land use is applied to the 180 hotel rooms, the rate 0.002 employee per square foot for “General Retail” land use is applied to the 18,200 square feet of commercial uses, the rate 0.004 employee per square foot for “Supermarket” land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for “Health Club” land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 35,000-square-foot restaurant, and the rate 0.004 employee per square foot for “General Office” land use is applied to the 48,000 square feet of office uses.

<sup>39</sup> Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

<sup>40</sup> Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.002 employee per square foot for “General Retail” land use is applied to the 18,200 square feet of commercial uses, the rate 0.004 employee per square foot for “Supermarket” land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for “Health Club” land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 35,000-square-foot restaurant, and the rate 0.004 employee per square foot for “General Office” land use is applied to the 48,000 square feet of office uses.

LAMC Section 57.4705.4 to provide an emergency helicopter landing facility, as described above in Subsection 2.a.(3)(e), or to implement one of two alternate options to an EHLF. At this time, the Applicant anticipates providing an emergency helicopter landing facility in accordance with LAMC Section 57.4705.4. The Project would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as set forth in the written correspondence from the LAFD included in Appendix L of this Draft EIR. Compliance with applicable City Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and 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.

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 that would reduce the demand on LAFD facilities and equipment resulting from the Project are provided. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Central City North Community Plan, as listed in the regulatory framework 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 Objective 9-1 of the Central City North Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). As discussed in the IV.J, Population and Housing, of this Draft EIR, the Project would not induce substantial unplanned population growth. Furthermore, if new facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA, and physical environmental impacts would need to be mitigated when feasible. **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 discussed in Section II, Project Description, of this Draft EIR, vehicular access, including emergency access to the Project Site, would be provided via six vehicular access points as follows:

1. Sunset Boulevard, intended to serve commercial and office uses;

2. White Knoll Drive, providing access to the Elysian Parking Facility and fire and emergency vehicle access;
3. Alpine Street, providing secondary commercial and residential access and primary service access;
4. Beaudry Avenue, providing primary residential access;
5. Beaudry Avenue, providing inbound access to the Sunset Building pick-up/drop-off area; and
6. Sunset Boulevard, providing right-in/right-out access to and from the Sunset Building pick-up/drop-off area.

As discussed in detail in Section IV.L. Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable 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. In addition, the Project would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained and the Project would not result in inadequate emergency access during operation of the Project. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

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 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. 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 the Utility Report included as Appendix S.2 of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by

LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Appendix L of this Draft EIR, the required fire water flow for the Project Site has been set at 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 psi, which corresponds to the Industrial and Commercial land use category. In addition, all hydrants must be spaced to provide adequate coverage of building exterior.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) 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. Based on the completed IFFAR (see Exhibit 1 of Appendix S.2 of this Draft EIR), six of the eight existing public fire hydrants (two on Sunset Boulevard, two on Beaudry Avenue, one on Alpine Street, and one on White Knoll Drive) flowing simultaneously can deliver combined flows of 9,000 gpm, which meets the required fire flow set for the Project Site. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified for the Project in accordance with LAMC Section 57.507.3.1.

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 double fire hydrants 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 described in the Utility Report, there are currently six existing fire hydrants located near the Project Site. 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 at this time. 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. Furthermore, in accordance with LAMC Section 57.4705.4, the Project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting of the Project and would reduce or eliminate the public hydrant demands. **Therefore, through LAFD and LADWP requirements, the Project's impacts with respect to fire flow would be less than significant.**

#### *(iv) Conclusion*

Based on the analysis above and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2) to provide these services, it is reasonable to conclude that Project operation would not require the addition of a new fire

station or the expansion, consolidation, or relocation of an existing facility in order to maintain service; such services will be provided by a local jurisdiction; and would not inhibit LAFD emergency response. **Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (i.e., fire), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Project-level impacts related to fire protection were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

# e. Cumulative Impacts

## (1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection services is the service areas of Fire Station Nos. 3, 20, 4, 11, and 9. The Project, in conjunction with growth forecasted in the City through 2028 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection services.

Cumulative growth in the greater Project area through 2028 includes 89 known development projects, growth that is anticipated by the City and will be incorporated into the Central City North Community Plan update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing, as well as general ambient growth, as described in Section III, Environmental Setting, of this Draft EIR.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 89 is a conservative assumption, as some of the related projects may not be built out by 2028 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 89 are fully built out by 2028, unless otherwise noted.

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 3, 20, 4, 11, and 9. The increase in development and service populations from the Project, related projects, as well as other future development in the Central City North Community Plan area would result in a cumulative increase in the demand for LAFD services. As concluded in the written correspondence from the LAFD included in Appendix L of this Draft EIR, development of the Project, as well as the related projects could have a cumulative impact on fire services, such as requiring increased staffing; additional fire protection facilities; and the relocation of present fire protection facilities, if the Project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects and other future development projects in the Central City North Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project and other future development projects in the Central City North Community Plan area would be required to comply with regulatory requirements related to fire protection. In addition, the Project, related projects, and other future development projects in the Central City North Community Plan area 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 code standards for the type and intensity of land uses involved.

Like the Project, the related projects and other future development projects in the Central City North Community Plan area would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.<sup>41</sup> Cumulative increases in demand for fire protection and emergency medical services due to related projects and other future development projects in the Central City North Community Plan area would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD 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.

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<sup>41</sup> *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

Additionally, consistent with the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b.(1) above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts.<sup>42</sup> Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

**Based on the above, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered government facilities (i.e., fire), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on fire protection would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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

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<sup>42</sup> Although an EIR was prepared for the construction of LAFD Fire Station No. 39, the EIR concluded there would be no significant impacts. See Notice of Determination for Van Nuys Fire Station 39.