

## **IV. Environmental Impact Analysis**

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### **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 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 (October 1, 2019) included in Appendix I.1, and the *Utility Infrastructure Technical Report: Water, Wastewater, and Energy*, prepared for the Project by KPFF Consulting Engineers, December 2020 (Utility Report), which is included in Appendix L of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) 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.

## (2) State

### *(a) 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.<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 2016 California Fire Code also went into effect on January 1, 2017.<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.

### *(b) California Vehicle Code*

Section 21806 of the California Vehicle Code pertains to emergency vehicles responding to Code 3 incidents/calls.<sup>3</sup> 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*

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

<sup>2</sup> California Fire Code, (California Code of Regulations, 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.

*highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety.... (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.*

*(c) 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 Trustees 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>

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

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

### (3) City of Los Angeles

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

Section 520 of the City of Los Angeles (City) Charter states that the LAFD's duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.

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

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City 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's 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

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<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.*

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 Beverly which turns into 1st Street approximately 0.3 mile north of the Project Site.<sup>8</sup>

*(d) Central City Community Plan*

As discussed in Section IV.F, Land Use and Planning, of this Draft EIR, the Project Site is located within the boundaries of the Central City Community Plan (Community Plan). The Community Plan, last updated in 2003, includes the following objectives and policies that are relevant to fire protection:

- Objective 6-1: Ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City.
  - Policy 6-1.1: 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.

*(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 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, LAMC Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit

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

<sup>9</sup> LAMC Article 7, Chapter V, 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.

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. LAMC Section 57.5101.1 requires that all new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. 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 57.505.1.2 requires new buildings to have approved identification placed in a position that is plainly legible and visible from the street fronting the property, 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,<sup>10</sup> 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 6,000 gpm to 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>11</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

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<sup>10</sup> The LAMC identifies exceptions to LAMC Section 57.503.1.4. See the LAFD letter on the Project included in Appendix I.1 of this Draft EIR for discussion.

<sup>11</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

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, and confirmed by LAFD, 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.<sup>12</sup> Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

LAMC Section 57.408 addresses emergency planning and evacuation requirements for high-rise buildings, including the creation and filing of an emergency plan; LAFD approval of emergency plans, procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations.<sup>13</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 57.408, 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 57.408.9.3 requires emergency evacuation signs to be posted in elevator lobbies and adjacent to the doorway leading to the exit stairs. LAMC Section 57.408.9.3 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

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<sup>12</sup> *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.*

<sup>13</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.*

compliance with two options.<sup>14</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
- 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.

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<sup>14</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.



- 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.

See the October 1, 2019, LAFD comment letter on the Project, included as Appendix I.1 of this Draft EIR, for a summary of the Fire Code requirements LAFD defined as being applicable to the project.

*(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>15</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 Maintenance Building.<sup>16</sup>

Of the stations nearest to the Project Site (e.g., Fire Station Nos. 3, 4, 9, 10, and 11, all within 1.8 miles or less of the Project Site), Fire Station No. 4, located at 800 North Main Street, was replaced by a new station located at 450 East Temple Street as a result of Proposition F. 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).<sup>17</sup> Fire Station No. 4 is within 1.1 miles of the Project Site.<sup>18</sup> Fire Stations No. 3 and No. 9 within less than 1 mile from the Project Site.

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<sup>15</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 December 4, 2019.

<sup>16</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 December 4, 2019.

<sup>17</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.

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>19</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>20</sup>

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 two 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 two acres.

*(g) Los Angeles Fire Department Strategic Plan 2018–2020<sup>21</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

<sup>18</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

<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.

<sup>20</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>21</sup> LAFD, Strategic Plan 2018–2020.

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.<sup>22</sup>

As shown in Figure IV.I.1- 1 on page IV.I.1-12, there are five LAFD fire stations located within a 2-mile radius of the Project Site. The closest station to the Project Site is Fire Station No. 3, which is the designated "first-in" station, located approximately 0.8 mile north of the Project Site at 108 North Fremont Avenue.<sup>23</sup> As provided by the LAFD and summarized in Table IV.I.1-1 on page IV.I.1-13, Fire Station No. 3 consists of a task force (includes an aerial ladder fire engine/truck company and two single engines),<sup>24</sup> 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 18.<sup>25</sup>

As indicated in Table IV.I.1-1, Secondary fire stations that serve the Project Site include Fire Station No. 9, which is located approximately 0.9 mile south of the Project Site at 430 East 7th Street; Fire Station No. 4, which is located approximately 1.1 miles east of the Project Site at 450 East Temple Street; Fire Station No. 10, which is located approximately 1.4 southwest of the Project Site at 1335 South Olive Street; and Fire Station No. 11, which is located approximately 1.8 miles west of the Project Site at 1819 West 7th Street.<sup>26</sup> Fire Station No. 9 consists of two assessment engines, a BLS truck, two paramedic rescue ambulance, a BLS rescue ambulance, a fast response unit,

<sup>22</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed December 4, 2019.

<sup>23</sup> LAFD, *Find Your Station*, [www.lafd.org/fire-stations/find-your-station](http://www.lafd.org/fire-stations/find-your-station), accessed December 4, 2019.

<sup>24</sup> LAFD, *Apparatus*, [www.lafd.org/about/about-lafd/apparatus](http://www.lafd.org/about/about-lafd/apparatus), accessed November 21, 2019.

<sup>25</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

<sup>26</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.





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



**Table IV.I.1-1  
Los Angeles Fire Department Fire 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 Avenue Los Angeles, CA 90012	0.8 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>	18 staff
Fire Station No. 9 430 E. 7th Street Los Angeles, CA 90014	0.9 mile	<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>	19 staff
Fire Station No. 4 450 E. Temple Street Los Angeles, CA 90012	1.1 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>	11 staff
Fire Station No. 10 1335 S. Olive Street Los Angeles, CA 90015	1.4 miles	<ul style="list-style-type: none"> <li>• Paramedic Rescue Ambulance</li> <li>• BLS Rescue Ambulance</li> <li>• Light Force</li> </ul>	14 staff
Fire Station No. 11 1819 W. 7th Street Los Angeles, CA 90057	1.8 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
<p><i>Source: Correspondence with Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.</i></p>			

and a staff of 19.<sup>27</sup> 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 11.<sup>28</sup> Fire Station No. 10 consists of a paramedic rescue ambulance, a BLS rescue ambulance, an assessment light force, and a staff of 14.<sup>29</sup> Fire

<sup>27</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

<sup>28</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

<sup>29</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

Station No. 11 consists of an assessment engine, a paramedic rescue ambulance, a BLS rescue ambulance, a light force, and a staff of 14.<sup>30</sup>

The response times for the above fire stations from January 2019 to October 2019 are identified in Table IV.I.1-2 on page IV.I.1-15. These response times 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.<sup>31</sup>

Roadway congestion, intersection level of service (LOS), 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 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>32</sup> The City has over 205 miles of major arterial routes that are equipped with FPS.<sup>33</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) and the *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847 ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

<sup>30</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

<sup>31</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.

<sup>32</sup> LADOT, Los Angeles Signal Synchronization Fact Sheet.

<sup>33</sup> LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

**Table IV.I.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	6:44	6:02
Fire Station No. 9	5:53	5:28
Fire Station No. 4	6:26	6:09
Fire Station No. 10	6:25	5:49
Fire Station No. 11	6:07	5:34
<p><sup>a</sup> Response times are based on January 2019–September 2019 data.</p> <p>Source: LAFD, FireStatLA, Station 3 Response Metrics for January–October 2019, <a href="http://www.lafd.org/fsla/stations-map?st=306&amp;year=2019">www.lafd.org/fsla/stations-map?st=306&amp;year=2019</a>, accessed December 4, 2019; FireStatLA, Station 9 Response Metrics for January–October 2019, <a href="http://www.lafd.org/fsla/stations-map?st=356&amp;year=2019">www.lafd.org/fsla/stations-map?st=356&amp;year=2019</a>, accessed December 4, 2019; FireStatLA, Station 4 Response Metrics for January–October 2019, <a href="http://www.lafd.org/fsla/stations-map?st=301&amp;year=2019">www.lafd.org/fsla/stations-map?st=301&amp;year=2019</a>, accessed December 4, 2019; FireStatLA, Station 10 Response Metrics for January–October 2019, <a href="http://www.lafd.org/fsla/stations-map?st=361&amp;year=2019">www.lafd.org/fsla/stations-map?st=361&amp;year=2019</a>, accessed December 4, 2019; FireStatLA, Station 11 Response Metrics for January–October 2019, <a href="http://www.lafd.org/fsla/stations-map?st=366&amp;year=2019">www.lafd.org/fsla/stations-map?st=366&amp;year=2019</a>, accessed December 4, 2019.</p>		

## (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 a driveway along Hill Street.

## (3) Fire Water Infrastructure

As discussed in the Utility Report, included as Appendix L 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). As discussed in the Utility Report, based on a water service map provided by LADWP, there are no existing domestic water or fire water services to the Project Site; however, there are 12-inch water mains in Hill Street and Olive Street, and an 8-inch water line in 4th Street. In addition, there are six existing LADWP fire hydrants in the vicinity of the Project Site: one along Olive Street, one along Hill Street, two along 4th Street, and two along the Angel's Flight funicular.

#### (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>34</sup> Therefore, the Project Site is not located within a fire hazard area.

#### (5) Reorganization by the LAFD<sup>35</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.

The LAFD established a 4-bureau system like LAPD, which includes, 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. The Project Site is located within LAFD's Central Bureau.<sup>36</sup>

### 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***

<sup>34</sup> City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 4, 2019.

<sup>35</sup> LAFD Implements New Bureau Command Structure, January 12, 2015, <http://lafd.org/news/lafd-implements-new-bureau-command-structure>, accessed December 4, 2019.

<sup>36</sup> LAFD, LAFD Bureaus Map, November 2015, [www.lafd.org/lafd-bureaus-map](http://www.lafd.org/lafd-bureaus-map), accessed December 4, 2019.



***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 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 protection 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 (e.g., a physical impact on the environment), 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 a 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 a Mitigated Negative Declaration.

### c. Project Design Features

The Project would incorporate LAFD Code requirements, including those summarized in the Letter from LAFD included as Appendix I.1. No specific project design features are proposed with regard to fire protection. However, as discussed in Section IV.J, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project would implement a Construction Management Plan that would include measures that would ensure emergency access (and minimize impacts to emergency response times) to the Project Site and adjacent properties and minimize impacts to vehicular and other forms of circulation, during construction.

### d. Analysis of Project Impacts

***Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered 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 that could require fire protection and EMS response. 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 CFR, Part No. 1926, as discussed further above in Subsection 2.a.(1). 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>37</sup> Additionally, in accordance with these regulations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.<sup>38</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 and construction impacts on the demand for fire protection and EMS would be less than significant.

Project construction could also potentially impact the provision of existing LAFD services to and within the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. However, construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections) and travel lanes would be maintained in each direction on all public 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.J, Transportation, of this Draft EIR, to ensure that adequate and safe emergency access (and minimize impacts to emergency response times) to the Project Site and adjacent properties during construction.

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 and response times. However, a Construction Management Plan would be implemented to minimize disruptions to through traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses (TR-PDF-1). As described in TR-PDF-1, the majority of construction-related traffic, including delivery, hauling activities and construction worker trips, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related

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<sup>37</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 October 24, 2019.*

<sup>38</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 December 4, 2019.*

conflicts and the slowing of emergency response times. In addition, the Construction Management Plan shall include, but not be limited to the following measures: construction worker and equipment parking would be prohibited on adjacent streets; temporary pedestrian and bicycle traffic controls would be implemented on Olive Street, 4th Street, and Hill Street during the construction period to ensure traffic safety within the public rights-of-way; temporary traffic controls would be implemented to improve traffic flow around the Project Site during the construction period; and construction activity would be contained on-site (except as may be required for improvements to the adjacent sidewalks and off-site utility connections). 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.

Lastly, as indicated in Table IV.I.1-1, four LAFD fire stations are located within 1.5 miles of the Project Site, including Fire Station No. 3, which is the designated “first-in” station, located approximately 0.8 mile north, Fire Station No. 9, which is located approximately 0.9 mile south; Fire Station No. 4, which is located approximately 1.1 miles east; Fire Station No. 10, which is located approximately 1.4 southwest. These four fire stations collectively meet the LAFD's first-in distance standards (a primary metric for adequate determinations) to the Project Site of 1.5 miles for a Truck Company, and Fire Station No. 3 meets the standards of 1.0 mile for an Engine Company. The LAFD also identifies Fire Station No. 11 as serving the Project Site (see Table IV.I.1-1 above) even though this station is located further away from the Project Site than the 1.5-mile standard response distance identified in the City's Framework Element and LAFD's 1.5-mile response distance criteria for an engine company.<sup>39</sup>

**Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. 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 0.8 mile north of the Project Site at 108 North Fremont Avenue. As provided by the LAFD and summarized in

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<sup>39</sup> Correspondence with Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.

Table IV.I.1-1 on page IV.I.1-13, Fire Station No. 3 is equipped with a task force, 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 18.<sup>40</sup> 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, four other LAFD fire stations (Fire Station Nos. 4, 9, 10, and 11), which accommodate a range of engine and truck companies, paramedics, etc., are located within 1.8 miles of the Project Site. Based on these distance criteria, and on the equipment and staffing levels at each of the fire stations set forth in Table IV.I.1-1, the LAFD has determined that existing fire protection resources are adequate to serve the Project.

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes 180 residential for-sale condominiums, 252 residential apartments, two hotels with a combined total of 515 guest rooms and 2,170 square feet of restaurant uses, and 72,091 square feet of general commercial (retail/restaurant) uses. These uses would generate approximately 1,042 residents and approximately 535 employees, for a total service population of 1,577 persons.<sup>41</sup>

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently mostly landscaped and vacant except for the Metro Pershing Square Station located at the southeast corner of the Project Site. Based on the uses currently occupying the Project Site, the Project Site currently generates a low demand for LAFD fire protection services. The Project would increase the building area and both the daytime and nighttime population of the Project Site compared to existing conditions. As such, the Project would increase the demand for LAFD fire protection services within LAFD's Central Bureau (specifically from Fire Station Nos. 3, 4, 9, 10, and 11).

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.

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<sup>40</sup> *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 1, 2019.*

<sup>41</sup> *See Table IV.H-2 in Section IV.H, Population and Housing, of this Draft EIR, for the basis of these estimates.*

As described in Section II, Project Description, of this Draft EIR, the Project would include buildings ranging in height from 494 feet to 854 feet. Thus, the Project is required by LAMC Section 57.4705.4 to provide an emergency helicopter landing facility, as described above in Subsection 2.a.(3)(3), or to implement one of two alternate options to an EHLF. 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., as well as the requirements set forth in the written correspondence from the LAFD included in Appendix I.1 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 in accordance with LAMC Section 57.118, 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 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 6-1 of the Central City Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element).

Given these regulatory requirements and LAFD's determination that existing fire protection resources are adequate to serve the Project, as well as LAFD's continued evaluation of existing fire facilities, the incremental increase in demand for fire protection and EMS resulting from Project operations would not be substantial enough to require a new fire station, or the expansion, consolidation, or relocation of an existing fire station, to maintain existing service levels. **Therefore, 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 under the Project would be provided via two access points, including one along Olive Street and another along 4th Street.

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 I.1 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 have the ability to 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 fire/life safety inspection for new construction projects in accordance with LAMC Section 57.118, 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 provided and/or 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 L of this Draft EIR, domestic and fire water service to the Project Site would 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 I.1 of this Draft EIR, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 gpm to 9,000 gpm from four to six fire hydrants flowing simultaneously with a minimum residual water pressure of 20 pounds psi. 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 (included as Exhibit 1 of the Utilities Report), the six existing public fire hydrants flowing simultaneously can deliver combined flows of 10,900 gpm, which exceeds the required range of 6,000 gpm to 9,000 gpm. 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 above, the six existing fire hydrants located near the Project Site provide sufficient fire flow. 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. Installation of these fire hydrants (and related water infrastructure) if needed would involve minor improvement onsite or adjacent to it that would not result in significant impacts. 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, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. **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, 4, 9, 10, and 11. A number of related projects identified in Section III, Environmental Setting, of this Draft EIR are within the service areas of these fire stations. The Project, in conjunction with growth forecasted in the City through 2026 (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 2026 includes 50 known development projects, growth that may be projected as a result of the land use designation and policy changes contained in the Central City Community Plan Update, as well as general ambient growth, as described in Section III, Environmental Setting, of this Draft EIR. As discussed below, however, the incremental increase in demand on LAFD services would not result in a cumulatively considerable impact.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 50 is a conservative assumption, as some of the related projects may not be built out by 2026 (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 50 are fully built out by 2026, unless otherwise noted.

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 3, 4, 9, 10, and 11. The increase in development and service populations from the Project, related projects, as well as other future development in the Central City 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 I.1 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 subject related projects and other future development projects in the Central City 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, like the proposed Project, each of the related projects and other future development projects in the Central City Community Plan area would be required to comply with regulatory requirements related to fire protection. In addition, the Project, the related projects, and other future development projects in the Central City 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 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>42</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 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.

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 Sections 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant

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<sup>42</sup> *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

impacts.<sup>43</sup> Therefore, the potential development of a station (if needed in the future) 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's contribution to cumulative fire protection impacts would not be cumulatively considerable. The development of the Project and related projects 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. **Therefore, cumulative impacts on fire protection services would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

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

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<sup>43</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.*