

## **IV. Environmental Impact Analysis**

---

### **F.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 facilities in the vicinity of the Project Site and considers factors used by the Los Angeles Fire Department (LAFD) to determine the adequacy of fire protection for a given area, including: fire flow requirements; response distance from existing fire stations; and LAFD's judgment for needs in the area. Emergency access to the Project Site and surrounding uses is also considered. This analysis is based, in part, on information available on LAFD's website; written correspondence from the LAFD Bureau of Fire Prevention and Public Safety dated July 25, 2019, and included in Appendix F; and the *Utility Infrastructure Technical Report: Water*, prepared for the Project by KPFF Consulting Engineers, dated March 19, 2021 (Utility Report), which is included in Appendix I of this Draft EIR.

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

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

###### **(1) Federal**

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 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.

### *(b) 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*

---

<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.

*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>

### (3) 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 conduct fire investigations and protect lives and property in case of disaster or public calamity.

---

<sup>4</sup> *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, 843, 847.

*(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>5</sup> The following objectives serve to fulfill that goal:

- Objective 9.16: Monitor and forecast demand for existing and projected fire facilities and services.
- Objective 9.17: Assure that all areas of the City have the highest level of fire protection and emergency medical services, at the lowest possible cost, to meet existing and future demand.
- Objective 9.18: Phase the development of new fire facilities with growth
- Objective 9.19: Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.

Under the Framework Element, the City standard for response distance from a fire station is 1.5 miles.<sup>6</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 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

---

<sup>5</sup> *City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services.*

<sup>6</sup> *City of Los Angeles General Plan Framework Element, p. 9-5.*

route to the Project Site is Figueroa Street, which is two blocks to the west of the Project Site.<sup>7</sup>

*(d) Central City Community Plan*

As discussed in Section IV.D, Land Use, of this Draft EIR, the Project Site is located within the Central City Community Plan area. The Central City Community Plan, last updated in 2003, includes the following objective and policy that are relevant to fire protection:

- Objective 6.1: To ensure that fire facilities and protective 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 the 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>8</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,

<sup>7</sup> City of Los Angeles General Plan Safety Element, Exhibit H, adopted by the City Council, November 26, 1996.

<sup>8</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; Ordinance Number 185,760, effective October 24, 2018, amended various provisions of the Los Angeles Fire Code to reflect changes consistent with 2016 amendments to the California Fire Code.

fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The 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, there are four categories of fire water flow requirements, all of which must maintain a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system:

- Low Density Residential: 2,000 gallons per minute (gpm) from three adjacent fire hydrants flowing simultaneously
- High Density Residential and Neighborhood Commercial: 4,000 gpm from four adjacent fire hydrants flowing simultaneously
- Industrial and Commercial: 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously
- High Density Industrial and Commercial (Principal Business Districts or Centers): 12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required)

As determined by the LAFD, the required fire water flow for the Project has been set at 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously, which corresponds to the Industrial and Commercial category from LAMC Section 57.507.3.1.<sup>9</sup>

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. As stated above, the LAFD has determined that the Project must adhere

---

<sup>9</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, July 25, 2019. See Appendix F of this Draft EIR.

to requirements under the Industrial and Commercial category from LAMC Section 57.507.3.1. Therefore, the Project 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. In addition, 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, procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations. 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>10</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 to three 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.

---

<sup>10</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.

*(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>11</sup> The Proposition F—Fire Facilities Bond Team consisted of the LAFD, the City Bureau of Engineering, and contracting firm Bovis Lend Lease. This team oversaw the allocation of funds and identified numerous projects to upgrade fire facilities, including construction of new training centers, replacement and construction of new fire stations, and the building of a new Air Operations Helicopter Facility and General Services Helicopter Fleet Maintenance Building.<sup>12</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>13</sup>

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involved the spending of \$600 million to renovate, improve, expand and construct public safety (police, fire, paramedic) facilities.<sup>14</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

<sup>11</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, *Fire Bond Projects*, [www.eng.lacity.org/fire\\_bond](http://www.eng.lacity.org/fire_bond), accessed August 30, 2019.

<sup>12</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, *Fire Bond Projects*, [www.eng.lacity.org/fire\\_bond](http://www.eng.lacity.org/fire_bond), accessed August 30, 2019.

<sup>13</sup> City of Los Angeles Department of Public Works, Bureau of Engineering, *Newsletter No. 20-5*, November 6, 2019.

<sup>14</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*.

renovation of police facilities.<sup>15</sup> As part of Proposition Q, the renovation of 80 fire stations was completed as of May 2014.<sup>16</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 2 acres. Standard fire stations were targeted to be located on 1-acre sites and satellite stations were targeted to be located on 0.75-acre sites. 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>17</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: (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

<sup>15</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>16</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>17</sup> *LAFD, Strategic Plan 2018–2020.*

community services. A total of 1,018 firefighters are always on duty at fire department facilities citywide, including the 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction. In addition, the LAFD is supported by 381 technical and administrative personnel.<sup>18</sup>

As shown in Figure IV.F.1-1 on page IV.F.1-12, there are five LAFD fire stations located within a 2-mile radius of the Project Site. The "first-in" station for the Project Site is Fire Station No. 10, which is located at 1335 S. Olive Street, approximately 1.0 mile southwest of the Project Site.<sup>19</sup> As shown in Table IV.F.1-1 on page IV.F.1-13, Fire Station No. 10 consists of a paramedic rescue ambulance, a Basic Life Support (BLS) rescue ambulance, an assessment light force, and 14 staff.<sup>20</sup>

As identified by the LAFD, secondary fire stations that serve the Project Site include Fire Station Nos. 9, 3, 11, and 4.

Specifically, Fire Station No. 9 is located at 430 East 7th Street, approximately 1.1 miles southeast of the Project Site. This station is equipped with two assessment engines, a BLS truck and rescue ambulance, two paramedic rescue ambulances, a Fast Response Unit, and 19 staff.<sup>21</sup> Fire Station No. 3 is located at 108 North Fremont Avenue, approximately 1.1 miles northwest of the Project Site, and consists of a task force, paramedic rescue ambulance, BLS rescue ambulance, Emergency Lighting Unit, a Command Post Vehicle, medical supply trailer, a back-up Urban Search & Rescue (US&R) Apparatus, and 18 staff.<sup>22</sup> Additionally, Fire Station No. 11 is located at 1819 West 7th Street, approximately 1.2 miles northwest of the Project Site, and consists of an assessment engine, paramedic rescue ambulance, BLS rescue ambulance, light force, and 14 staff.<sup>23</sup> Lastly, Fire Station No. 4 is located at 450 East Temple Street, approximately

<sup>18</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed September 17, 2020.

<sup>19</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, July 25, 2019. See Appendix F of this Draft EIR.

<sup>20</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, July 25, 2019. See Appendix F of this Draft EIR.

<sup>21</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, July 25, 2019. See Appendix F of this Draft EIR.

<sup>22</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, July 25, 2019. See Appendix F of this Draft EIR.

<sup>23</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, July 25, 2019. See Appendix F of this Draft EIR.





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



**Table IV.F.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. 10 1335 S. Olive Street Los Angeles, CA 90015	1.0 mile	<ul style="list-style-type: none"> <li>• Paramedic Rescue Ambulance</li> <li>• BLS Rescue Ambulance</li> <li>• Assessment Light Force</li> </ul>	14 staff
Fire Station No. 9 430 E. 7th Street Los Angeles, CA 90014	1.1 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>	19 staff
Fire Station No. 3 108 N. Fremont Avenue Los Angeles, CA 90012	1.1 miles	<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 Urban Search &amp; Rescue Apparatus</li> </ul>	18 staff
Fire Station No. 11 1819 W. 7th Street Los Angeles, CA 90057	1.2 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. 4 450 E. Temple Street Los Angeles, CA 90012	1.9 miles	<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
<p><i>A Light Force is comprised of a truck company running with a single engine. A Task Force is comprised of a truck company running with two engines.</i></p> <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, July 25, 2019. See Appendix F of this Draft EIR.</i></p>			

1.9 miles east of the Project Site, and consists of an assessment engine, paramedic rescue ambulance, BLS rescue ambulance, an EMS Battalion Captain, and 11 staff.<sup>24</sup>

Specific response times for these stations in 2019 are shown in Table IV.F.1-2 on page IV.F.1-14. For the first-in station, Fire Station No. 10, the average operational response times were as follows for specific types of emergencies: emergency medical

<sup>24</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, July 25, 2019. See Appendix F of this Draft EIR.

**Table IV.F.1-2  
Average Operational Fire Response Times (2019)**

<b>Station</b>	<b>Average Response Time to Emergency Medical Services (Minutes:Seconds)</b>	<b>Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)</b>	<b>Average Response Time to Critical ALS (Minutes:Seconds)</b>	<b>Average Response Time to Structure Fire (Minutes:Seconds)</b>
Fire Station No. 10	6:23	5:48	5:31	4:35
Fire Station No. 9	5:54	5:25	4:48	4:23
Fire Station No. 3	6:44	6:03	5:46	5:05
Fire Station No. 11	6:07	5:34	5:16	4:32
Fire Station No. 4	6:27	6:10	5:35	4:48
Citywide	6:39	6:23	5:45	5:01
<p><i>Response times are based on January to December 2019 data.</i></p> <p><i>Source: LAFD, FireStatLA, <a href="http://www.lafd.org/fsla/stations-map?year=2019">www.lafd.org/fsla/stations-map?year=2019</a>, accessed September 22, 2020.</i></p>				

service incidents—6 minutes 23 seconds; non-emergency medical services—5 minutes 48 seconds; critical advanced life support (ALS) incidents—5 minutes 31 seconds; and structure fires—4 minutes 35 seconds. As shown in the table, response times can differ between fire stations. In comparison, Citywide average operational response times were as follows: emergency medical service incidents—6 minutes 39 seconds; non-emergency medical services—6 minutes 23 seconds; critical ALS incidents—5 minutes 45 seconds; and structure fires—5 minutes 1 second in 2019.<sup>25</sup> According to these LAFD metrics, response times for the Fire Station No. 10 are less than the Citywide response times.

The response times for the stations serving the Project Site are shown in Table IV.F.1-2. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response. 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 the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency

<sup>25</sup> LAFD, FireStatLA, City Wide Response Metrics for 2019, January–December 2019, [www.lafd.org/fsla/stations-map?year=2019#](http://www.lafd.org/fsla/stations-map?year=2019#), accessed September 22, 2020.

response.<sup>26</sup> The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.<sup>27</sup>

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment 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 Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847 ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services.

## (2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with a low-rise four-level parking structure and a surface parking lot. Vehicular access, including emergency vehicle access, to the Project Site is currently provided from four existing driveways with four existing curb cuts: one existing curb cut along Grand Avenue, two existing curb cuts along 8th Street, and one existing curb cut along Hope Street.

## (3) Fire Water Infrastructure

As discussed in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC). Water service is currently provided to the Project Site via an 8-inch water main within the Hope Street right-of-way, a 12-inch water main within the 8th Street right-of-way, and a 12-inch water main within the Grand Avenue right-of-way. Based on the Utility Report included as Appendix I of this Draft EIR, there are no indications of the location or existence of water services to the parking uses on-site.

---

<sup>26</sup> LADOT, *Los Angeles Signal Synchronization Fact Sheet*.

<sup>27</sup> LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, Bulletin No. 133, October 2008.

In addition, there are six existing public fire hydrants in the vicinity of the Project Site. The hydrant locations are: northwest corner of 8th Street and Hope Street; northeast corner of 8th Street and Hope Street; southeast corner of 8th Street and Hope Street; southwest corner of 8th Street and Grand Avenue; southeast corner of 8th Street and Grand Avenue; and northeast corner of 8th Street and Grand Avenue.

#### (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. The Project Site is located in Fire District No. 1, which consists of areas identified by the City that are required to meet additional development regulations to reduce fire hazard-related risks.

### 3. Project Impacts

#### a. Thresholds of Significance

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

***Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (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 factors and considerations identified below from the *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate fire protection services:

- 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 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. The 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.<sup>28</sup> 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 generally be located on parcels that are infill opportunities, similar to existing fire stations in the Project vicinity, and on lots that range from 0.75 to 2 acres in size, as described above; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

### **c. Project Design Features**

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9) and the Fire Code (Chapter 7); and Section 57.507.3.1 of the LAMC regarding fire flow requirements. No project design features are proposed with regard to fire protection.

In addition, as discussed in Section IV.G, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project would implement a Construction Traffic

---

<sup>28</sup> *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal, App. 4th 833, 847.

Management Plan and a Worksite Traffic Control Plan that would include provisions for maintaining emergency access to the Project Site 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. 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>29</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>30</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

<sup>29</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 September 22, 2020.

<sup>30</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 September 22, 2020.

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. Construction activities would 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. As discussed in the impact analysis provided in Section IV.G, 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 would require the following: closure of the right turn lane and bike lane adjacent to the Project Site along Grand Avenue; closure of up to eight feet of the curb lane, relocation of two bus stops along 8th Street, removal of one on-street parking space, and closure of the sidewalk and right-turn lane along 8th Street; and closure of up to eight feet of the curb lane on Hope Street on occasion as needed, which would require the temporary removal of two on-street parking spaces on Hope Street. However, a Construction Traffic Management Plan and a Worksite Traffic Control Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 discussed in Section IV.G, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The plans would be prepared by the Project Applicant for approval by LADOT prior to the issuance of any construction permits and would provide a detour plan, haul routes, and a staging plan. In addition, the plans would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Project Applicant would coordinate plan details with emergency services and affected transit providers to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. 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. Therefore, emergency access to the Project Site would remain unobstructed during construction of the Project.

**Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, (i.e. fire), or the 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. Therefore, impacts to fire protection and emergency medical services during Project**

**construction would be less than significant, and no mitigation measures are required.**

*(b) Operation*

The analysis of the Project's potential operational impacts on LAFD services addresses potential impacts associated with LAFD resources and equipment, response distances and access, and the ability of the water infrastructure system to provide the necessary fire flows.

*(i) Facilities, Equipment, and Response Distance*

The Project Site would continue to be served by Fire Station No. 10, which is the designated "first-in" station for the Project Site, located approximately 1.0 mile southwest of the Project Site at 1335 S. Olive Street. As provided by the LAFD and summarized in Table IV.F.1-1 on page IV.F.1-13, Fire Station No. 10 consists of a paramedic rescue ambulance, a Basic Life Support (BLS) rescue ambulance, an assessment light force (i.e., a truck company with a single engine), and 14 staff.<sup>31</sup> As such, based on criteria regarding response distance per LAMC Section 57.507.3.3, the Project Site is located within the required 1-mile response distance from a fire station with an engine company and within the required 1.5-mile response distance from a fire station with a truck company. Therefore, the LAFD has determined fire protection (based on the response distance from existing fire stations criteria) to be adequate.<sup>32</sup> In addition, as discussed above, the LAFD has identified Fire Station Nos. 9, 3, 11, and 4 as capable of responding to the Project Site.

As discussed in Section II, Project Description, of this Draft EIR, the Project would provide 580 residential units and up to 7,499 square feet of ground floor commercial/retail/restaurant space on a site that is currently occupied by a four-level parking structure and a surface parking lot. Based on a 2.41 persons per household rate provided by the City of Los Angeles and employee generation rates provided by the City of Los Angeles VMT Calculator Documentation Guide, the Project would generate approximately 1,398 residents and 30 employees.<sup>33,34,35</sup> Thus, the Project's development would increase

<sup>31</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, July 25, 2019. See Appendix F of this Draft EIR.

<sup>32</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, July 25, 2019. See Appendix F of this Draft EIR.

<sup>33</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.

the building area and the demand for LAFD fire protection services on-site when compared to existing conditions. The proposed uses would be expected to generate a range of fire service calls similar to other such typical residential and commercial/retail/restaurant uses. 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. Therefore, combined with the features discussed below, 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's 50-story high-rise mixed-used building would reach a maximum height of 592 feet above ground level. 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)(e), or implement one of two alternate options to forgo an emergency helicopter landing facility. The Project would comply with Option 2 of LAFD Requirement No. 10 with approval from the Fire Marshal. In compliance with Option 2, the Project would provide all applicable additional life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways. The Project would also 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 F 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 would be provided that would reduce the demand on LAFD facilities and equipment resulting from the Project. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency

---

<sup>34</sup> As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.

<sup>35</sup> Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 7,499 square feet.

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).

*(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 on 8th Street, Hope Street, and Grand Avenue.

The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access as set forth in the written correspondence from the LAFD included in Appendix F 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 vicinity. 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, 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.

*(iii) Fire Flow*

As discussed in the Utility Report included as Appendix I of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As determined by the LAFD in their written correspondence provided in Appendix F of this Draft EIR, the Project falls within the Industrial and Commercial category, which requires a fire flow of 6,000 gallons per minute to 9,000 gallons per minute with a minimum residual water pressure of 20 pounds per square inch, which translates to 1,500 gallons per minute per hydrant. 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. As described in the Utility Report, there are currently six existing fire hydrants located near the Project Site. Based on the completed IFFAR (see Exhibit 1 of the Utility Report included as Appendix I of this Draft EIR), the six existing public fire hydrants flowing simultaneously can deliver combined flows of 9,000 gallons per minute, which is within the required range of 6,000 gallons per minute to 9,000 gallons per minute. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified by LAFD 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. The Project would also 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.

*(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 (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant and no mitigation measures are required.**

## **(2) Mitigation Measures**

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

## **(3) Level of Significance After Mitigation**

Project-level impacts with regard 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. 10, 9, 3, 11, and 4. The Project, in conjunction with growth forecasted in the City through 2025 (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. As identified in Section III, Environmental Setting, of this Draft EIR, there are 74 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 74 is a conservative assumption, as some of the related projects may not be built out by 2025 (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 74 are fully built out by 2025, unless otherwise noted. As also discussed in Section III, Environmental Setting, of this Draft EIR, the City Planning Department is currently updating the Central City Community Plan in conjunction with the Central City North Community Plan in a combined planning process often referred to as the DTLA 2040 Plan. The DTLA 2040 Plan, which once adopted, will be a long-range plan designed to accommodate growth in Central City until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2025, well before the DTLA 2040 Plan's horizon year. Moreover, 2025 is a similar projected buildout year as many of the related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above,



would account for any overlapping growth that may be assumed by the DTLA 2040 Plan upon its adoption.

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 10, 9, 3, 11, and 4. The increase in development and service populations from the Project and related projects in the Central City Community Plan area would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the 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. Moreover, given that the Project Site is located within an urban area, the related projects identified in the area would also be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Furthermore, each related project and other future development in the Central City 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 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.

The Project and related projects 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>36</sup> Cumulative increases in demand for fire protection services due to related projects would be identified and addressed through the City's annual programming and budgeting processes. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time, as appropriate. LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the Community Plan 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 similar to existing fire stations in the Project vicinity, and on lots that range from 0.75 to 2 acres in size, as

---

<sup>36</sup> *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

described above; and (3) would otherwise have their own CEQA document such as a Mitigated Negative Declaration or could qualify for a categorical exemption.<sup>37</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.

With regard to cumulative impacts on fire protection, consistent with the *City of Hayward v. Board of Trustees of California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b. above, the obligation to provide adequate fire protection and emergency medical 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. If LAFD determines that new facilities are necessary at some point in the future, as discussed above, such facilities would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection services would be less than significant.

**Based on the above, development of the Project and related projects would not result in significant cumulative impacts associated with an increase in fire protection services demand that would require a new fire station, or the expansion of an existing fire station, the construction of which could cause significant environmental impacts. As such, cumulative impacts on fire protection services would be less than significant.**

## (2) Mitigation Measures

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

## (3) Level of Significance After Mitigation

Cumulative impacts with regard to fire protection services 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.

---

<sup>37</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.