IV. Environmental Impact Analysis

H.1 Public Services – Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning dated September 24, 2020, which is included in Appendix I of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

There are several plans, policies, and programs regarding fire protection at the federal, State, and local levels. Described below, these include:

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency Mutual Aid System
- California Vehicle Code, Section 21806
- California Constitution Article XIII, Section 35
- California Governor's Office of Emergency Services
- City of Los Angeles Charter
- City of Los Angeles General Plan Framework Element

- City of Los Angeles General Plan Safety Element
- Wilshire Community Plan
- City of Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA) as well as California OSHA (Cal-OSHA) enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(b) Federal Emergency Management Act

FEMA was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

(c) Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [U.S.C.] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. Section 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the

streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent, if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

(2) State

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.[1] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include: the installation of 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 in wildfire hazard areas. Specific

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

California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.[2]

(b) California Fire Service and Rescue Emergency Mutual Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.[4]

(c) California Vehicle Code, Section 21806

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incident/calls.[5] This section of the CVC states the following:

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

2 Los Angeles Fire Department (LAFD), Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

3 Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised December 2014.

4 LAFD, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

5 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.

accomplished with reasonable safety…. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(d) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Proposition 172 directs 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, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have a "constitutional obligation to provide adequate fire protection services".

(e) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Gov. Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system (see discussion of Mutual Aid Agreements, below).

California Emergency Management Agency (Cal-EMA) maintains oversight of the state's mutual aid system.

(3) Local

(a) City of Los Angeles Charter

Section 520 of the Los Angeles City Charter states that the LAFD shall have the power and duty to control and extinguish injurious or dangerous fires and remove that which is likely to cause those fires; enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City; 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), originally adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.H.1-1, *Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies***, below. Goal 9J of the Framework Element Infrastructure and Public Services Chapter specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure. Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.[6] This is consistent with the specifications for response distances within the LAMC.

[6] City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire.

TABLE IV.H.1-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT INFRASTRUCTURE AND PUBLIC SERVICES GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Policy 9.16.1	Monitor and forecast demand for existing and projected fire facilities and service.
Objective 9.17	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Policy 9.17.2	Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
Policy 9.17.4	Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Objective 9.19	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes, or considering discretionary land use permits.
Policy 9.19.1	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.3	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.

SOURCE: City of Los Angeles, 2001.

(c) City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 26, 1996, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as shown in **Table IV.H.1-2, *Relevant General Plan Safety Element Goals, Objectives, and Policies***. In addition, the City's Safety Element designates disaster routes.

TABLE IV.H.1-2
RELEVANT GENERAL PLAN SAFETY ELEMENT GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
Goal 2	A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Response: Develop, implement, and continue to improve the City's ability to respond to emergency events. [All EOO emergency response programs and all hazard mitigation and disaster recovery programs related to protecting and reestablishing communications and other infrastructure, service and governmental operations systems implement this policy.]
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.] The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: • Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. • Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. • If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress. • The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 gpm would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more gpm, not less than 3 engine companies and 2 truck companies.

TABLE IV.H.1-2
RELEVANT GENERAL PLAN SAFETY ELEMENT GOALS, OBJECTIVES, AND POLICIES

Goal/Objective/Policy	Description
	These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster. [All EOO recovery programs involving cooperative efforts between entities implement this policy.]

SOURCE: City of Los Angeles, 2001.

(d) Wilshire Community Plan

The Land Use Element of the City of Los Angeles General Plan is comprised of 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use at the community level. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to fire protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project is located within the Wilshire Community Plan Area. The Wilshire Community Plan was completed in 1976, revised in 1988, and adopted on September 19, 2001. The Wilshire Community Plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west. The Wilshire Community Plan sets forth

planning goals and objectives to maintain the community's distinctive character. The Wilshire Community Plan provides one goal, two policies, and one objective regarding fire protection.[7] However, the policies do not pertain to private developments and are developed for the City to maintain and evaluate the fire protection by LAFD.

(e) City of Los Angeles Municipal Code

The Los Angeles Fire Code (LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code and the International Fire Code. The City's 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. Specific regulations regarding fire prevention and protection are discussed below.

LAMC Section 57.106.5.2 authorizes the Fire Chief to require drawings, plans, or sketches that may be necessary to identify: (1) occupancy access points; (2) devices and systems within the scope of Chief's Regulation No. 4; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste.

LAMC Section 57.107.6 requires that the installation, alteration, and major repair of the following shall be performed under permit of the Department of Building and Safety: LAFD communication systems; building communication systems; automatic elevators; heliports and emergency helicopter landing facilities; 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.

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 57.118.1.1 requires that all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) must include fire/life safety reviews by the Department of Building and Safety and LAFD.

LAMC Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an

[7] City of Los Angeles Department of City Planning, Wilshire Community Plan, adopted September 19, 2001, pages III-20 and III-21.

emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

LAMC Section 57.4704.4.3.1 requires that all smoke detectors must be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. In addition, no person is permitted to use, maintain, or allow to exist any portable, fuel-burning, unvented room heater in any building classified as residential occupancy, or any compressed gases or liquefied flammable gases.

LAMC Section 57.4705.4 requires each building to have a rooftop emergency helicopter landing facility in a location approved by the Chief.

LAMC Section 57.4705.1.6 requires at least one elevator in each bank of elevators to be available for fire emergency service and to have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floor. The elevator or elevators must be interconnected with the standby power.

LAMC Section 57.503.1.4 requires an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway.

LAMC Section 57.507.3.1 establishes fire water flow standards, which 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. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved hydrant. The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development.

LAMC Section 57.507.3.3 limits the maximum response distances to an LAFD station based on the type of land use. Applicable distances are based on LAFD's comment letter for each individual project.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with LAMC Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

(f) Propositions F and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations that provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least two acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 18 new or replacement/expanded fire/paramedic stations, one regional fire station and training facility, and one emergency air operations and helicopter maintenance facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.[8]

Proposition Q, the Citywide Public Safety General Obligation Bond Program, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[9]

(g) Measure J

Measure J, which was approved by voters at the November 7, 2006 General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.

(h) Los Angeles Fire Department Strategic Plan 2018-2020

The Los Angeles Fire Department Strategic Plan 2018-2020, A Safer City 2.0 (Strategic Plan 2018–2020), is a collaborative effort between LAFD staff, City

8 LAFD, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb-March 2016.

9 City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report – February/March 2016.

leaders, and community members to accomplish the LAFD's organizational vision.[10] 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) providing public safety and emergency service; (2) embracing a healthy, safe, and productive work environment; (3) capitalizing on advanced technology; (4) enhancing LAFD sustainability and community resiliency; and (5) increasing opportunities for personal growth and professional development.

b) Existing Conditions

(1) Fire Protection Facilities

The LAFD provides the City with fire prevention, fire suppression, life safety and emergency medical services. The LAFD is a full-spectrum life safety agency that serves a population of approximately four million people. The LAFD's 3,246 uniformed personnel and 353 civilian support staff provide technical rescue, hazardous material mitigation, disaster response, public education, and community services. There are a total of 1,018 uniformed firefighters, including 270 serving as firefighters/paramedics, on 24-hour duty at 106 fire stations across the LAFD's 471-square-mile jurisdiction.[11]

The LAFD emergency services are divided across four geographic bureaus including Central, South, Valley, and West. The Project Site is located in LAFD's Operations South Bureau, which encompasses the southern portion of Los Angeles Battalions 6, 13 and 18 and the headquarters are located at San Pedro City Hall at 638 S. Beacon Street, Suite 374. Communities within the Operations South Bureau include Berth 194, Century City, Coliseum Area, Crenshaw, Crenshaw/Baldwin Hills, Fairfax, Fish Harbor, Fort MacArthur Area, Harbor City, Harbor Gateway, Mid-City, North San Pedro, Palms, Pico/Robertson, Ports O'Call/Cruise Terminal, San Pedro, San Pedro South Shores, South Los Angeles, Southwest LA/Hyde Park, Terminal Island, Watts, and Wilmington.[12]

As shown in **Figure IV.H.1-1, *Fire Station Boundaries***, there are two fire stations that provide primary fire protection services to the Project Site and surrounding area. **Table IV.H.1-3, *Fire Stations Located in the Project Vicinity***, includes the location, distance/direction from the Project Site, average response times, and equipment for each of the fire stations.

[10] LAFD, A Safer City 2.0 Strategic Plan 2018-2020, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed January 23, 2020.

[11] LAFD, Department Overview – Our Mission, http://www.lafd.org/about/about-lafd/our-mission, accessed January 23, 2020.

[12] LAFD, South Bureau, https://www.lafd.org/about/south-bureau, accessed January 23, 2020.

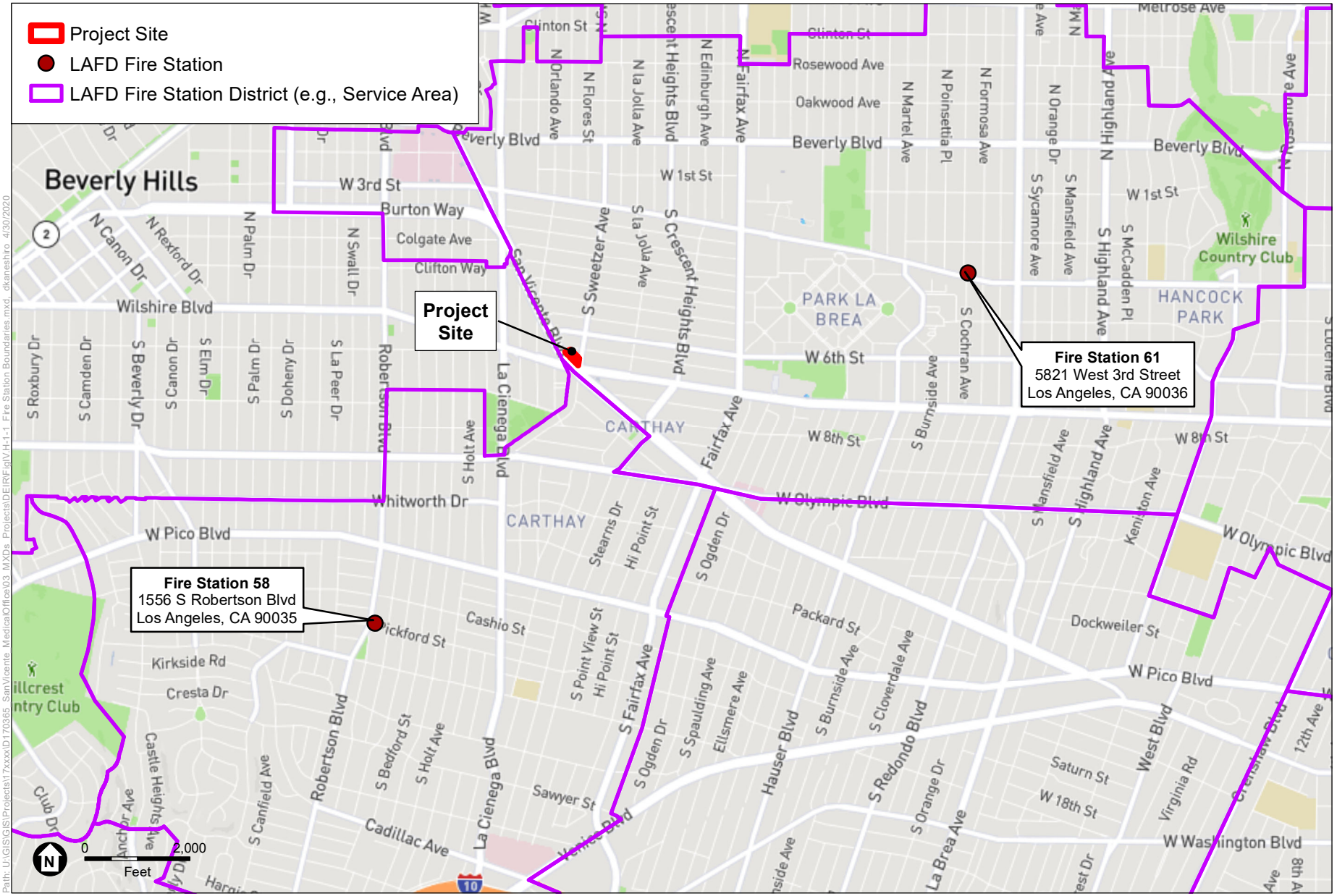

Figure IV.H.1-1
Fire Station Boundaries

TABLE IV.H.1-3
FIRE STATIONS LOCATED IN THE PROJECT VICINITY

Fire Station/Location	Driving Distance/ Direction from Project Site	Average Response Times[a,b,c]		Equipment	Staffing
		EMS	Non-EMS		
Fire Station 58 1556 South Robertson Boulevard	1.9 miles southwest	7:03	7:02	One fire engine, one basic life support ambulance, and one advance life support ambulance	8
Fire Station 61 5821 West 3rd Street	2 miles northeast	6:58	6:32	Two fire engines, one ladder truck, and two ambulances	14

[a] LAFD, FireStatLA, http://www.lafd.org/fsla/stations-map, accessed January 23, 2020.

[b] Average Response times from January through December of 2019 provide the most accurate annual average. Average Response Times include call processing, turn out, and travel time. The Citywide average response time from January through December 2019 is 6:39 for EMS and 6:23 for non-EMS.

[c] Non-EMS = Fire and other services. EMS = Emergency Medical Services.

SOURCE: LAFD, FireStatLA, http://www.lafd.org/fsla/stations-map, accessed January 23, 2020; Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated September 24, 2020. Provided in Appendix I-1 of this Draft EIR.

As shown in Table IV.H.1-3, Fire Station 61 at 5821 West 3rd Street is located nearest to the Project Site, approximately two miles northeast using driving distance as a measurement, and Fire Station 58 at 1556 South Robertson Boulevard is also within a similar proximity to the Project Site, approximately 2.1 miles southwest using driving distance as a measurement. Per the City's Zone Information and Map Access System (ZIMAS) website, Fire Station 61 is the first-due fire station for the Project Site. Fire Station 58 would provide back-up response to the Project Site.

According to the City's Fire Code (LAMC Section 57.507.3.3), the first-due Engine Company should be within one mile of the Project Site and the first-due Truck Company should be within 1.5 miles for a high density residential and commercial neighborhood. As indicated in Table IV.H.1-3, Fire Station 61, which is the first-due fire station and includes an Engine Company and Truck Company, is located approximately 1.5 miles from the Project Site with a driving distance of

approximately two miles. Fire Station 58, which would provide back-up response to the Project Site and includes an Engine Company, is located approximately 1.17 miles from the Project Site with an approximate driving distance of approximately 2.1 miles.

Specific response times for the stations for January through December 2019 are included in Table IV.H.1-3. Fire Station 61, the closest station to the Project Site, had an average response time of 6:58 and 6:32 for EMS and non-EMS incidents, respectively. Fire Station 58 had an average response time of 7:03 and 7:02 for EMS and non-EMS incidents, respectively. The Citywide average response times between January and December 2019 were 6:39 and 6:23 for EMS and non-EMS incidents, respectively.

As LAFD has not formally established response times standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standards of five minutes for EMS response and 5:20 minutes for fire suppression response (as established for fire department turnout time and travel time, which does not include call intake, processing, or transfer, or dispatch), this discussion regarding response times is for informational purposes only.[13] 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 Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[14] The City has over 205 miles of major arterial routes that are equipped with FPS.[15]

According to the LAFD, although response time is considered to assess the adequacy of fire protection 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 judgement 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 of*

[13] 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, https://www.nfpa.org/Codes-and-Standards/ARCHIVED/Safer-Act-Grant/NFPA-1710, accessed October 29, 2020.

[14] Los Angeles Department of Transportation (LADOT), Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

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

Trustees of California State University (2015) 242 Cal.App.4th 833 ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection.

The LAFD has recently been taking a number of steps to improve their related systems, processes and practices, which in turn serve to reduce response times. Upgrades recently completed or pending include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident.[16]

(2) Emergency Access

As described in **Chapter II, *Project Description***, of this Draft EIR, the Project Site is currently developed with a 5,738 square-foot vacant educational building, an 8,225 square-foot Big 5 Sporting Goods store, and associated surface parking.[17] Vehicular access, including emergency vehicle access, to the Project Site is provided from the frontage road of South San Vicente Boulevard and can either be accessed via 6th Street or Sweetzer Avenue, and Orange Street via ingress and egress driveways.

The Project Site is accessible by emergency vehicles from a number of major roadways (e.g., Wilshire Boulevard, South San Vicente Boulevard, South Sweetzer Avenue) serving the Project Site. Fire Station 61, the first-due fire station, includes both an Engine Company and Truck Company and has access to the Project Site from the northeast via West 3rd Street to South Sweetzer Avenue, or from South Cochran Avenue to Wilshire Boulevard.

(3) Fire Water Infrastructure

In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type of occupancy, and degree of fire hazard. Fire flow requirements vary from 2,000 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 psi.[18]

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16 LAFD, A Safer City 2.0 Strategic Plan 2018-2020, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed January 23, 2020.

17 The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

18 City of Los Angeles, Los Angeles Municipal Code, Ordinance No. 182,822, Section 57.507.3.1, Fire-Flow Requirements.

There are several existing public fire hydrants in the immediate vicinity of the Project Site. There are three existing public fire hydrants located along South San Vicente Boulevard and Orange Street. The closest existing public fire hydrant is located at the northeast corner of the intersection of South San Vicente Boulevard and Orange Street; another one located approximately 165 feet northeast of the Project Site on the northwest corner of the intersection of South Sweetzer Avenue and Orange Street; and one located at the northeast corner of the intersection of South Sweetzer Avenue and South San Vicente Boulevard. In addition, there are several other hydrants located within 500 feet of the Project Site in all directions.[19] The Project Site currently connects to domestic and fire water service off South Sweetzer Avenue.

(4) Fire Hazard Areas

The Project Site is located in an urbanized area with no natural vegetation. The Project Site is currently developed with a 5,738 square-foot vacant educational building, an 8,225 square-foot Big 5 Sporting Goods store, and associated surface parking.[20] Surface parking is located on the eastern portion of the Project Site and at the center of the Project Site between the two buildings, and to the rear of the Big 5 Sporting Goods store. There are no State responsibility areas or lands classified as Very High Fire Hazard Severity Zones on or near the Project Site.[21]

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 services if it would:

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

19 KPFF Consulting Engineers, 656 South Vicente Boulevard Utility Technical Report: Water, Wastewater, July 9, 2019.

20 The 5,738 square-foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

21 City of Los Angeles Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, accessed February 2019.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factor to evaluate fire protection services impacts include whether 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.

The deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact, but rather a social and/or economic impact.[22] Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact related to fire protection and emergency medical services will result from the construction of new or expanded fire protection and emergency medical facilities. 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 and one acre in size, and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

b) Methodology

Fire protection needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the Project. Changes in these factors resulting from the Project may increase the demand for services. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis, including review of the Project's emergency features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities. Beyond the standards included in the Fire Code, consideration is given to the size of the Project, uses proposed, fire flow necessary to accommodate the Project, distance of engine and truck companies (the distance standard is one mile for an Engine Company and 1.5 miles for a Truck Company) from the Project Site, fire hydrant sizing and placement standards, access, and the Project's potential to use or store hazardous materials. Based on these factors, a determination is made as to whether the LAFD would require the addition of a new or physically altered

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

facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. As part of the analysis, the LAFD was consulted and their responses were incorporated regarding the Project.

c) Project Design Features

No specific project design features are proposed with regard to fire protection. Refer to Project Design Features TRAF-PDF-2, Construction Traffic Management Plan, and TRAF-PDF-3, Construction Worker Parking Plan, in **Section IV.I, *Transportation***, of this Draft EIR. No additional fire protection-related project design features are applicable to the Project.

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, 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

Fires associated with construction activities could be caused by exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources, including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with OSHA, Fire Code, and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, Project construction would comply with applicable existing codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials.

Project construction activities could also potentially affect emergency response times and emergency access to the Project Site and the vicinity due to Project construction traffic and temporary street closures. The Project would be required to implement Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan, to minimize disruptions to traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. As described in Project Design Feature TRAF-PDF-2, a detailed Construction Traffic Management

Plan will include, but not be limited to, a traffic control plan to route vehicular traffic, bicyclists, and pedestrians around potential closures; ensure that access will remain unobstructed for land uses in proximity to the Project Site; and coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses and residences. Additionally, as part of Project Design Feature TRAF-PDF-3, Construction Worker Parking Plan, alternate parking location(s) and the method of transportation to and from the Project Site would be identified to reduce parking on or near the Project Site and emergency access to the Project Site would be maintained throughout construction.

The Project Site is located in an established urban area that is well served by an existing road network. As shown in the City of Los Angeles Safety Element, South San Vicente Boulevard and Wilshire Boulevard, which are located directly adjacent to the Project Site to the west and south, respectively, are Selected Disaster Routes that could be utilized during a disaster event.[23] As such, the Project is largely accessible from the adjacent roadways. Emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Although minor traffic delays due to temporary lane closures needed to facilitate specific construction activities could occur, particularly during the construction of utilities and street improvements, impacts to fire protection services would be considered less than significant for the following reasons:

1. Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD (refer to Project Design Feature TRAF-PDF-2 in **Section IV.I, *Transportation***, of this Draft EIR);
2. Construction impacts are temporary in nature and do not cause lasting effects; and
3. Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic, in accordance with Section 21806 of the CVC. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

As the Project is anticipated to maintain emergency access during construction, which is temporary in nature, and emergency vehicles have options for avoiding traffic, Project construction would not result in substantial adverse impacts to emergency response times and emergency access, which would consequently not

[23] City of Los Angeles Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit H – Critical Facilities and Lifeline Systems in the City of Los Angeles.

affect service ratios, response times, other performance objectives for fire protection.

(i) Conclusion

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, 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. Therefore, impacts to fire protection and emergency medical services during Project construction would be less than significant.

(b) Operation

(i) Facilities and Equipment

As detailed in Table IV.H.1-3, above, Fire Station 58, located approximately 1.9 miles southwest of the Project Site using driving distance as a measurement, is the first-due fire station to respond to an emergency on the Project Site. In additionally, Fire Station 61, is located approximately two miles northeast of the Project Site using driving distance as a measurement, and would provide back-up response to the Project Site. LAMC Section 57.507.3.3 provides for the following response distances, which, if exceeded, require the installation of an automatic fire sprinklers system: one mile for an Engine Company and 1.5 miles from a Truck Company for a high-density residential and commercial development. Both Fire Station 61 and Fire Station 58 do not meet either distance standards for an Engine Company or Truck Company.

As discussed in **Chapter II, *Project Description***, of this Draft EIR, the Project would replace the existing uses on the Project Site with a 12-story medical office/retail-commercial building, which would result in a net increase of 566 employees, as calculated in the Initial Study, which is provided in Appendix A of this Draft EIR.[24] Thus, the Project would increase intensity of the Project Site and increase the Project's Site's demand for fire protection services compared to existing conditions.

The Project would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements, including: the provision of fire resistant doors, materials, walkways, stairwells, and elevator systems (including emergency and fire control elevators); installation of a fire sprinkler suppression system, smoke detectors, signage, fire alarms, building emergency communication systems, smoke control systems; implementation of an Emergency Safety Plan;

[24] As provided in Table 3 of the Initial Study for the Project, the number of proposed uses was calculated to have 614 employees less the number of existing uses, which was calculated to have 48 employees, results in a net increase of 566 employees on the Project Site.

compliance with LAFD fire apparatus and personnel access requirements; and water systems and roadway improvements improved to the satisfaction of the LAFD. In addition, the Project would comply with LAFD's preliminary recommendations contained in correspondence provided in Appendix I-1 of this Draft EIR. These recommendations address access for LAFD during demolition and within the proposed structure; installation of a Knox Box; required building identification; building setbacks; fire lane width; LAFD approval of plot plans showing fire hydrants and access; LAFD approval of any electric gates; emergency responder radio coverage; ; and LAFD review and approval of final plans and specifications. Compliance with applicable Los Angeles Building Code and Fire Code requirements and recommendations would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements and recommendations, including LAFD's fire/life safety 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 without creating the need for new or expanded fire facilities.

(ii) Response Distance and Emergency Access

As previously discussed, the required response distance for the Project Site is one mile to a fire station with an Engine Company and 1.5 miles to a fire station with a Truck Company. Both Fire Station 61, the first-due fire station to respond to an emergency on the Project Site, and Fire Station 58, which would provide back-up response to the Project Site, do not meet either distance standards for an Engine Company or Truck Company; therefore, the installation of automatic fire sprinklers would be required.

As described in **Chapter II, *Project Description***, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided from South San Vicente Boulevard and Orange Street via ingress and egress driveways. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access to within and in the vicinity of the Project Site. As such, emergency access to the Project Site would be maintained at all times.

It is acknowledged that the Project would increase traffic on surrounding roadways. However, the area surrounding the Project Site includes an established street system, consisting of primary and secondary arterials, and collector and local streets that provide regional, sub-regional, and local access and circulation within the local 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. In addition, emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel (including bypassing of signalized intersections), driving in the lanes of opposing traffic pursuant to Section 21806 of the CVC and multiple station response. Furthermore, because of the grid-like pattern of the local street system, each of the fire stations that serve the Project Site have multiple routes available to respond to emergency calls at the Project Site. Additionally, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding Project Site access, including providing adequate emergency vehicle access. Compliance with applicable Los Angeles Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Therefore, based on the considerations above, despite the Project increase in traffic, the Project would not significantly impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

(iii) Fire-Flow and Demand

Based on the Utility Report prepared for the Project, and included as Appendix D of the Initial Study, which is provided in Appendix A of this Draft EIR, the LAFD has determined that the required fire-flow for the Project, which falls within the industrial and commercial category, would be from 6,000 to 9,000 gpm (total) from four to six fire hydrants flowing simultaneously with a residual water pressure of 20 psi.[25] This translates to a required flow of 1,500 gpm for each of four hydrants, or 1,000 gpm for each of six hydrants flowing simultaneously.

An Information of Fire Flow Availability Request (IFFAR) were submitted to the Los Angeles Department of Water and Power (LADWP) to confirm adequate fire flow pressure for the Project from the existing infrastructure. LADWP indicated in the IFFAR results that the existing public water system can supply 6,300 gpm from six hydrants flowing simultaneously, with a residual pressure greater than 20 psi.[26] Refer to the IFFAR results in Exhibit 2 as provided by LADWP, which confirm that the Project has adequate fire flow available to comply with LAMC Section 57.513. The Project would be designed to comply with applicable regulatory requirements of the Fire Code, and development plans would be subject to review and approval by the LAFD. At the time of review, should LAFD determine additional hydrants or

[25] KPFF Consulting Engineers, 656 South Vicente Boulevard Utility Technical Report: Water, Wastewater, July 9, 2019, page 14.

[26] KPFF Consulting Engineers, 656 South Vicente Boulevard Utility Technical Report: Water, Wastewater, July 9, 2019, Exhibit 2, IFFAR, page 19.

a higher gpm is required, the Project would install additional hydrants or improve the public water system, as necessary.

The Project would also incorporate a fire sprinkler suppression system, which would be subject to fire department review and approval of the design and permitting of the Project. As noted, a Fire Service Advisory Request (SAR) was submitted to LADWP in order to make sure the existing infrastructure that the Project Site is currently connected to could meet the demands of the Project. The SAR for the domestic and fire water service off South Sweetzer Avenue shows that a static pressure of 61 psi and a flow of up to 2,500 gpm can be delivered with a residual pressure of 60 psi.[27]

Therefore, the Project would comply with applicable regulatory requirements of the Fire Code, and development plans would be subject to review and approval by the LAFD.

(iv) Conclusion

Based on the above, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered 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. Therefore, impacts to fire protection and emergency medical services during Project operation would be less than significant.

(2) Mitigation Measures

Impacts regarding fire protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding 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.

e) Cumulative Impacts

(1) Impact Analysis

Impacts to LAFD services and facilities for each of the related projects would be addressed as part of each related project's development review process conducted by the City. Each related project would be subject to the City's routine permitting process, which would include a review by the LAFD to ensure that

[27] KPFF Consulting Engineers, 656 South Vicente Boulevard Utility Technical Report: Water, Wastewater, July 9, 2019, Exhibit 1, SAR, page 17.

sufficient measures are implemented to reduce potential impacts to fire protection services.

Chapter III, *Environmental Setting*, of this Draft EIR, identifies four related projects (two in the City of Los Angeles, one in the City of Beverly Hills, and the Metro Purple Line Extension which is in both the City of Los Angeles and the City of Beverly Hills). Of the four related projects, three are located within the City and within the service areas of the LAFD. While the remaining related project is located within the City of Beverly Hills, based on the Mutual Aid Plan, as jurisdictions around the City of Los Angeles may be impacted by LAFD services, this related project was considered in this cumulative analysis. . The related projects located within the City are located within the fire station service areas of the same LAFD Fire Stations that would serve the Project (i.e., Fire Stations No. 61 and 58).

(a) Construction

As with the Project, each related project would 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. However, similar to the Project, 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. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with applicable federal, state and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

In the event that Project construction occurs concurrently with related projects in proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Traffic Management Plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-ways. Since the Project would not require substantial narrowing of adjacent public rights-of-ways that may be hazardous to roadway travelers, the Project would not have significant impacts on access and safety. Similar to the Project, each related project would implement similar design features during construction and would be subject to the City's routine construction permitting process, or equivalent permitting process for the related project in the City of Beverly Hills, which includes a review by LAFD to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and related projects would not significantly impact LAFD

response times within the Project Site vicinity as drivers of fire and emergency vehicles have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes opposing traffic, pursuant to Section 21806 of the CVC. Finally, the Project in and of itself would not cause a significant impact to fire protection services during construction.

(b) Operation

Similar and in addition to the Project, the increase in development, which includes an increase of 143 dwelling units, 11,685 square feet of retail uses, and 200 hotel rooms, and service population from these related projects would generate the need for additional fire protection and EMS from the fire stations identified above.

As stated by LAFD, the development of the Project and the related projects may result in the need for increased staffing for existing facilities, additional fire protection facilities, and relocation of present fire protection facilities.[28] With regard to facilities and equipment, similar to the Project, the related projects would be required to implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire-flow, storage and management of hazardous materials, and alarm and communications systems. Compliance with applicable Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided and reduce demand on LAFD facilities and equipment. As with the Project, other related projects may also include the installation of automatic fire sprinklers to enhance fire safety that would further reduce the demand placed on the LAFD facilities and equipment.

The Project, as well as the 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 by the City. 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.

With regard to response distance, given that the related projects are generally located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or

[28] Ralph M. Terrazas, Fire Chief, and Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department (LAFD), correspondence dated September 24, 2020. Provided in Appendix I-1 of this Draft EIR.

more existing fire stations. Additionally, in accordance with Fire Code requirements, if a related project would not be within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Project, the related projects would be required to comply with all applicable Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review prior to the issuance of a building permit.

With regard to response times, the Project and related projects would introduce new uses that would generate additional traffic in the Wilshire Community Plan area. Traffic from the Project and related projects has the potential to increase emergency vehicle response times due to travel time delays caused by the additional traffic. However, as with the Project, related projects are expected to include design features and mitigation measures that would serve to reduce traffic impacts. Furthermore, as previously stated, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, despite the cumulative increase in traffic, the Project and related projects would not significantly impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection service 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, as appropriate.[29] At this time, LAFD has not identified that it will be constructing a new station in the area impacted by this Project due to projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to two acres in size (such as the five stations identified as serving the Project Site), and (3) would likely qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts. Further analysis, including a specific location for a new fire station or expansion or alteration of the existing fire stations which would service

[29] City of Los Angeles, Budget for the Fiscal Year 2018-19, modified and adopted by City Council on May 25, 2018.

the Project Site and the related projects' sites, would be speculative and, therefore, beyond the scope of this Draft EIR.

(c) Conclusion

Based on the above, the Project's contribution to cumulative impacts associated with the provision of new or physically altered fire facilities, the construction of which would result in substantial adverse environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts 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.

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