

IV. Environmental Impact Analysis

J.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 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 and inter-departmental correspondence from LAFD to the City of Los Angeles (City) Department of City Planning on August 6, 2021, which is included in Appendix K of this Draft EIR. Additional technical information used in the analysis is based on the Utility Infrastructure Technical Report: Water, Wastewater and Energy (Utility Report) prepared for the Project, included in Appendix O.¹

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

¹ KPFF Consulting Engineers, TVC 2050 Project—Utility Infrastructure Technical Report: Water, Wastewater and Energy, March 2022.

- California Fire Service and Rescue Emergency Aid System
- California Vehicle Code
- 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
- Community Plan
- 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 Administration (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 Part 1926, Subpart F, Fire Protection and Prevention. 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 firefighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(b) Federal Emergency Management Act

The Federal Emergency Management Agency (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

The Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Native American tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 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 Disaster Mitigation 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 the Disaster Mitigation 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); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation 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 general 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, 2020.² 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 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.³

(b) California Fire Service and Rescue Emergency 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 (Cal 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).⁴ The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, 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, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All Cal 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 Cal OES.⁵

² California Building Code (CCR, Title 24, Part 2).

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

⁴ Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.

⁵ Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.⁶ 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 accomplished with reasonable safety. (b) The operator of every street car shall immediately stop the street car, clear of any intersection, and remain stopped until the authorized emergency vehicle has passed. (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: “[t]he 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 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. 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.”

⁶ 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.

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

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City 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.J.1-1 on page IV.J.1-7. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection

Table IV.J.1-1
Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies

Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	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 9.17.2	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.
Policy 9.17.4	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.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	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.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.
<hr/> <p><i>Source: City of Los Angeles, General Plan Framework Element, 2001.</i></p>	

service, emergency medical service, and infrastructure.⁷ 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.⁸ This is consistent with the specifications for response distances within the LAMC.

⁷ City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services.

⁸ City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire.

(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.J.1-2 on page IV.J.1-9. In addition, the City's Safety Element designates disaster routes. As discussed in the Initial Study prepared for the Project, included as Appendix A to this Draft EIR, the nearest disaster routes within the Project area are Beverly Boulevard adjacent to the Project Site's northern property line and La Cienega Avenue, approximately 1.0 mile to the west.

(d) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. 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 City's 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.

As discussed in Section IV.H, Land Use and Planning, of this Draft EIR, the Project Site is located within the Wilshire Community Plan (Community Plan) area. The Community Plan, adopted on September 19, 2001, includes the following objectives and policies that are relevant to fire protection:

Objective 9-1: Maintain fire facilities and protective services that are sufficient for the existing and future population and land use.

Policy 9-1.1: Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.

Policy 9-1.2: Assist the City of Los Angeles Fire Department in locating fire service facilities at appropriate locations throughout the Wilshire Community Plan Area.

Table IV.J.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	<p>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.]</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.</p>
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.

Table IV.J.1-2 (Continued)
Relevant General Plan Safety Element Goals, Objectives, and Policies

Goal/ Objective/ Policy	Description
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.]
<hr/> Source: <i>City of Los Angeles, General Plan Safety Element, 2006.</i>	

(e) 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 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste.

LAMC Section 57.108.7 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: LAFD communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

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 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 57.4704.5.1 requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

LAMC Section 57.4705.1.6 requires there must be at least one elevator which shall be available for fire EMS and shall 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 floors. The elevator(s) must be interconnected with standby power.

LAMC Section 57.4705.4 requires each building to have a rooftop emergency helicopter landing facility in a location approved by the Fire Chief, 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.⁹

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 (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required), with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in

⁹ 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.

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 2.0 miles for a truck company, shall comply with Section 57.507.3.3.

LAMC Section 57.512.2 provides that 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 to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 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 19 new or replacement neighborhood Fire/Paramedic Stations and an 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.¹⁰ Also, as reported in November 2019, the Bureau of Engineering (BOE) completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.¹¹

¹⁰ Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb–March 2016.

¹¹ City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.

Proposition Q, the Citywide Public Safety Bond Measure, 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.¹²

(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, is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development.

¹² City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report—February/March 2016.

b. Existing Conditions

(1) Fire Protection Services and Facilities

LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across LAFD's 469-square-mile jurisdiction. At any given time, a total of 1,018 firefighters are on 24-hour duty. In addition, LAFD is supported by 381 technical and administrative personnel.¹³

As shown in Figure IV.J.1-1 on page IV.J.1-15, there are two LAFD fire stations located within a two-mile radius of the Project Site. The closest station to the Project Site is Fire Station No. 61, which is the designated "first-in" station, located approximately 1.2 miles southeast of the Project Site at 5821 West 3rd Street.¹⁴ As provided by LAFD and summarized in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 61 consists of a task force (including an aerial ladder fire engine/truck company and two single engines), a paramedic rescue ambulance, a basic life support (BLS) rescue ambulance, and a staff of 14.¹⁵ A secondary fire station that serves the Project Site is Fire Station No. 41, which is located approximately 1.9 miles north of the Project Site at 1439 North Gardner Street.¹⁶ Fire Station No. 41 consists of an engine, a paramedic rescue ambulance, a Brush Patrol apparatus, and a staff of 6.¹⁷

LAFD also identified three additional fire stations beyond a two-mile radius of the Project Site that could serve the Project Site. Fire Station No. 27, which is located approximately 3.0 miles northeast of the Project Site at 1327 North Cole Avenue, consists of a task force, a paramedic rescue ambulance, a BLS rescue ambulance, an Urban Search and Rescue apparatus, and a staff of 16.¹⁸ Fire Station No. 58, which is located approximately 3.3 miles southwest of the Project Site at 1556 South Robertson Boulevard, consists of an assessment engine, two paramedic rescue ambulances, a BLS rescue

¹³ LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed March 11, 2022.

¹⁴ LAFD, Find Your Station, www.lafd.org/fire-stations/station-results, accessed March 11, 2022.

¹⁵ Written correspondence from Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.

¹⁶ Written correspondence from Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.

¹⁷ Written correspondence from Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.

¹⁸ Written correspondence from Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.

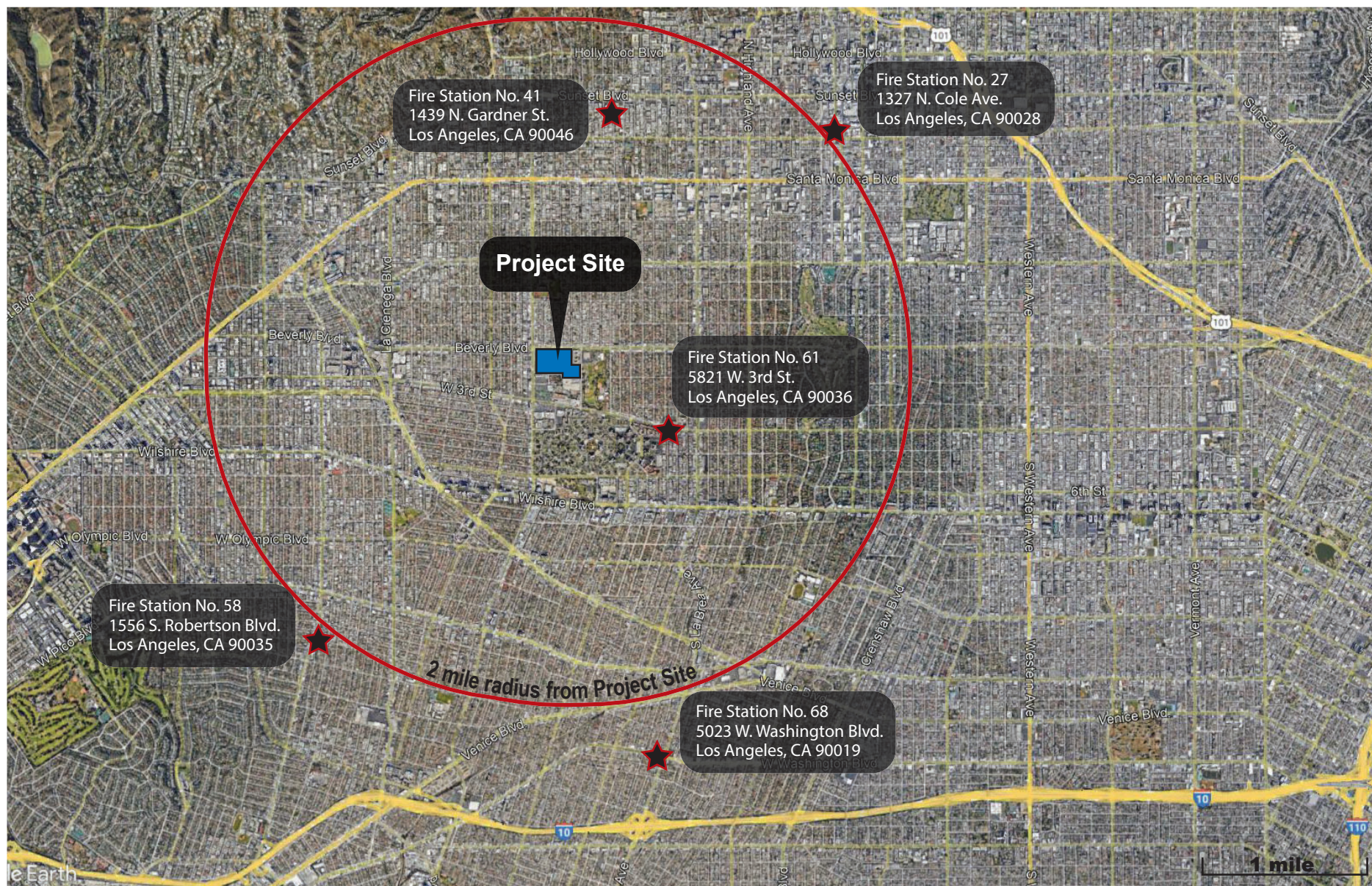


Figure IV.J.1-1
Fire Stations in the Vicinity of the Project Site

**Table IV.J.1-3
LAFD Stations Located in the Vicinity of the Project Site**

Station No. and Address	Distance from Project Site	Equipment	Staffing
Fire Station No. 61 5821 W. 3rd St. Los Angeles, CA 90036	1.2 miles	<ul style="list-style-type: none"> • Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance 	• 14 staff
Fire Station No. 41 1439 N. Gardner St. Los Angeles, CA 90046	1.9 miles	<ul style="list-style-type: none"> • Engine • Paramedic Rescue Ambulance • Brush Patrol Apparatus 	• 6 staff
Fire Station No. 27 1327 N. Cole Ave. Los Angeles, CA 90028	3.0 miles	<ul style="list-style-type: none"> • Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Urban Search and Rescue Apparatus 	• 16 staff
Fire Station No. 58 1556 S. Robertson Blvd. Los Angeles, CA 90035	3.3 miles	<ul style="list-style-type: none"> • Assessment Engine • 2 Paramedic Rescue Ambulances • BLS Rescue Ambulance 	• 8 staff
Fire Station No. 68 5023 W. Washington Blvd. Los Angeles, CA 90019	3.5 miles	<ul style="list-style-type: none"> • Engine • Paramedic Rescue Ambulance 	• 8 staff
<p><i>Source: Correspondence with Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.</i></p>			

ambulance, and a staff of 8.¹⁹ Fire Station No. 68, which is located approximately 3.5 miles southeast of the Project Site at 5023 West Washington Boulevard, consists of an engine, a paramedic rescue ambulance, and a staff of eight.²⁰

The response times for January 2021 to December 2021 are shown in Table IV.J.1-4 on page IV.J.1-17. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.²¹

¹⁹ Written correspondence from Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.

²⁰ Written correspondence from Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, August 6, 2021.

²¹ NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for emergency medical service and fire suppression incidents.

**Table IV.J.1-4
Average Emergency Medical Service and Structure Fire Response Times**

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 61	5:10	5:05
Fire Station No. 41	4:58	5:04
Fire Station No. 27	4:23	3:53
Fire Station No. 58	5:01	5:10
Fire Station No. 68	4:45	4:45
<p>^a Response times are based on January 2021–December 2021 data.</p> <p>Source: LAFD: FireStatLA, Station 61 Response Metrics for January–December 2021, www.lafd.org/fsla/stations-map?station=61&year=2021; Station 41 Response Metrics for January–December 2021, www.lafd.org/fsla/stations-map?station=41&year=2021; Station 27 Response Metrics for January–December 2021, www.lafd.org/fsla/stations-map?station=27&year=2021; Station 58 Response Metrics for January–December 2021, www.lafd.org/fsla/stations-map?station=58&year=2021; Station 68 Response Metrics for January–December 2021, www.lafd.org/fsla/stations-map?station=68&year=2021, accessed March 21, 2022.</p>		

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.²² The City has over 205 miles of major arterial routes that are equipped with FPS.²³

According to LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is only 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 LAFD's judgment for needs in a specific area. If the number of incidents in a given area increases, it is LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of

²² LADOT, Los Angeles Signal Synchronization Fact Sheet.

²³ LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

service. In conformance with the California Constitution Article XIII, Section 35(a)(2), the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services. Thus, the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

With regard to studio and filming activities such as those that presently occur at the Project Site, LAFD's Film Unit in the Bureau of Fire Prevention and Public Safety oversees motion picture and television production studios and sound stages, approved production facilities and locations, and commercial digital media production conducted in the City.²⁴ Filming activities must meet the LAFD Film Unit's Studio/Sound Stage Fire & Life Safety Requirements, and certain special effects such as pyrotechnics require a permit.²⁵

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, to the Project Site is currently available via one driveway along Beverly Boulevard and two driveways on Fairfax Avenue.

(3) Fire Water Infrastructure

As discussed in the Utility Report, included as Appendix O of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via LADWP water lines within the adjacent streets. Specifically, according to the Utility Report, there is an eight-inch water line in Fairfax Avenue that heads south then follows 1st Street. The Project Site has two points of connection to a 12-inch water line in Fairfax Avenue and an eight-inch water line in Beverly Boulevard. In addition, according to the Utility Report, there are six existing LADWP fire hydrants surrounding the Project Site: four fire hydrants along the northern property line on Beverly Boulevard, one fire hydrant along the western property line on Fairfax Avenue, and one fire hydrant along the eastern property line on The Grove Drive. More specifically, fire hydrant F-37746 is located on the east side of Fairfax Avenue approximately 58 feet south of the centerline of 1st street. Hydrant F-44235 is located on the south side of Beverly Boulevard approximately five feet west of the Orange Grove Avenue centerline. Hydrant F-44236 is located on the south side of Beverly Boulevard approximately 14 feet west of the Ogden Drive centerline. Hydrant F-44237 is located on the south side of Beverly Boulevard

²⁴ LAFD, Film Unit, www.lafd.org/film-unit, accessed March 21, 2022.

²⁵ LAFD Film Unit, Studio/Sound Stage Fire & Life Safety Requirements, revised March 2019.

approximately 25 feet east of the Genesee Avenue centerline. Hydrant F-44238 is located on the south side of Beverly Boulevard approximately two feet west of Spaulding Avenue. Hydrant F-81960 is located on the west side of The Grove Drive approximately 492 feet south of the Beverly Boulevard centerline.

(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.²⁶ Therefore, the Project Site is not located within a fire hazard area.²⁷

(5) Reorganization by LAFD

In January 2015, LAFD initiated a major reorganization of the Department's Emergency Services Bureau, creating four distinct geographic bureaus, each with a Deputy Chief reporting directly to the LAFD Chief Deputy of Emergency Operations.²⁸ The objective of this reorganization was for each new Bureau Commander and their staff to establish a more effective and responsive business model than was previously possible through the traditional rotating shift, platoon duty system. The bureaus were organized to operate during normal weekday business hours and allow bureau commanders and staff to be available 24 hours each day to respond to significant emergencies.

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

3. Project Impacts

a. Thresholds of Significance

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

²⁶ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5512-001-003, 5512-002-001, 5512-002-002, and 5512-002-009, <http://zimas.lacity.org>, accessed March 11, 2022.

²⁷ Refer to Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of wildfire impacts.

²⁸ LAFD Implements New Bureau Command Structure, January 12, 2015, <http://lafd.org/news/lafd-implements-new-bureau-command-structure>, accessed March 11, 2022.

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

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

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

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

b. Methodology

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

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is reasonably foreseeable as a 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 historical development of fire and emergency facilities, such that in the event the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1.0 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or a Mitigated Negative Declaration.

c. Project Design Features

No Project design features are proposed with regard to fire protection. However, as discussed in Section IV.K, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project will implement a Construction Traffic Management Plan that includes 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 governmental 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

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 Title 29 CFR, Part 1926, as discussed 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.²⁹ Additionally, in accordance with OSHA provisions, fire suppression equipment (e.g., fire extinguishers) specific to construction activities would be maintained on-site.³⁰ As discussed in Section IV.F, Hazards and Hazardous Materials, of this Draft EIR, Project construction would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Compliance with applicable regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing LAFD services in the vicinity of the Project Site as a result of construction impacts on the surrounding roadways. Specifically, as discussed in Section IV.K, Transportation, of this Draft EIR, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, construction activities associated with the installation of new driveways, traffic signals, left-turn lanes, and sidewalks as well as improvements to curbs, gutters, etc. would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site on Fairfax Avenue, Beverly Boulevard, and The Grove Drive. As such, segments of the existing sidewalks surrounding the Project Site are expected to be temporarily closed during construction. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained. In addition, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1, detailed in Section IV.K, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term with varied intensities, Project construction activities could temporarily impact emergency access. However, with implementation of Project Design Feature TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction

²⁹ 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, accessed March 11, 2022.

³⁰ 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, accessed March 11, 2022.

worker trips, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, dedicated turn lanes for construction trucks, rerouting of construction trucks to reduce travel on congested streets, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Additionally, haul truck staging would be prohibited on any streets adjacent to the Project Site, unless specifically approved as a condition of an approved haul route. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Project construction activities would not require a new fire station or the expansion of an existing facility in order to maintain service levels, the construction of which would cause significant environmental impacts. Therefore, impacts on fire protection services during Project construction would be less than significant.

(b) Operation

(i) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 61, which is the designated “first-in” station for the Project Site, located approximately 1.2 miles southeast of the Project Site at 5821 West 3rd Street. As provided by LAFD and summarized in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 61 is equipped with a task force (including an aerial ladder fire engine/truck company and two single engines), a paramedic rescue ambulance, a BLS rescue ambulance, and a staff of 14. Based on the LAMC criteria regarding response distance, the Project Site would be located outside of the required 1.0-mile response distance from a fire station with an engine company but would be located within the 1.5-mile response distance from a fire station with a truck company. Therefore, as stipulated in LAMC Sections 57.507.3.3 and 57.512.2, the Project would be required to include automatic fire sprinkler systems in all structures, in addition to the fire protection features listed in LAFD’s inter-departmental correspondence regarding the Project (see Appendix K). Although the Project would exceed the LAFD-required response distance for a fire station with an engine company, LAFD concludes in its correspondence that “inclusion of the above listed recommendations, along with any additional recommendations made during later reviews of the proposed project will reduce the impacts to an acceptable level.”

As described in Section II, Project Description, of this Draft EIR, the Project would involve the modernization and expansion of Television City in accordance with a proposed Specific Plan. At full buildout, the Specific Plan would permit a total of up to a maximum of 1,874,000 square feet of floor area within the Project Site. Specifically, the Specific Plan would allow for the construction of up to 1,626,180 square feet of new sound stage, production support, production office, general office, and retail uses; the demolition of up to 495,860 square feet of existing uses; and the retention of up to 247,820 square feet of existing uses. Therefore, the Project would result in a total net increase of approximately 1,130,320 square feet of floor area upon full buildout.

As such, the Project would increase the demand for LAFD fire protection and emergency medical services. The proposed uses would be expected to generate a range of fire service calls similar to other studio uses, potentially including electrical fires, car fires, etc. However, 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. Additionally, filming activities would continue to be subject to the LAFD's Studio/Sound Stage Fire & Life Safety Requirements, and special effects such as pyrotechnics would continue to be permitted through LAFD's Film Unit. Accordingly, appropriate safety protocols and equipment would be in place, and the types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment provided on-site combined with that available at the fire stations nearest the Project Site. Refer to Section IV.F, Hazards and Hazardous Materials, of this Draft EIR for further discussion of the use, handling, storage, and transport of any potentially hazardous materials.

Per LAMC Section 57.4705.4, the Project would be required to provide an emergency helicopter landing facility (EHLF), as described above in Subsection 2.a.(3)(e), or to implement one of two alternate options to an EHLF. As discussed in Section II, Project Description, of this Draft EIR, an existing helipad has been in operation on-site since 1951. The original Conditional Use Permit (CUP) (ZA No. 11412), approved on October 17, 1950, authorized the existing helipad and recognized it as a necessary accessory use to a successful studio. The existing helipad use would be retained as a part of the Project in approximately the same location on the campus, but at a higher elevation.

In addition, the Project would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage, and management of hazardous materials, alarm and communications systems, etc., including as set forth in the written correspondence from LAFD included in Appendix K of this Draft EIR. Compliance with applicable Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118 prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and fire/life safety inspection, would ensure that adequate fire prevention features that reduce the demand on LAFD facilities and equipment are provided. As such, compliance with LAFD procedures and Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and, therefore, reduce the need for a new fire station or the expansion, consolidation, or relocation of an existing fire station. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, Safety Element, and Wilshire Community Plan, as listed in Subsection 2.a, Regulatory Framework, above, the City and LAFD would continue to monitor the overall demand for existing and projected fire facilities and coordinate the development of new fire facilities to be phased with growth.³¹ As discussed in Section VI, Other CEQA Considerations, of this Draft EIR and evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, the Project would not induce substantial unplanned population growth. Furthermore, if new facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA, and physical environmental impacts would be addressed, as necessary. **Given these procedures and policy directives, Project impacts with regard to LAFD facilities and equipment would be less than significant.**

(ii) Emergency Access

As discussed in Section II, Project Description, of this Draft EIR, vehicular access, including emergency access to the Project Site, would be provided via nine vehicular access points as follows:³²

1. Three driveways along Beverly Boulevard, including one entry/exit driveway and two right-in/right-out driveways;
2. Three driveways along Fairfax Avenue, including one entry/exit driveway and two right-in/right-out driveways;
3. One entry/exit driveway on The Grove Drive; and
4. Two right-in/left-out entry/exit driveways along the Southern Shared Access Drive.³³

³¹ Refer to Framework Element Objectives 9.16 and 9.18, Safety Element Policy 2.1.6, and Fire Protection Objective 9-1 of the Wilshire Community Plan.

³² Project Site vehicular access is shown in Figure IV.K-3 in Section IV.K, Transportation, of this Draft EIR.

³³ The Southern Shared Access Drive is a privately-owned right-of-way that is partially located on the Project Site and partially located off-site on the adjacent properties to the south. While not a component of the Project, the Southern Shared Access Drive provides shared access to the Project Site and the
(Footnote continued on next page)

As discussed in detail in Section IV.K, Transportation, of this Draft EIR, the Project's driveways and internal circulation would be designed to meet all applicable Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Compliance with such requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118, prior to the issuance of any building permit. In addition, the Project would not include the installation of any barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding area would be maintained, and the Project would not result in inadequate emergency access during operations. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Based on the above, emergency access to the Project Site and surrounding area would be maintained, and impacts with regard to emergency access would be less than significant.

(iii) Fire Flow

As discussed in the Utility Report included as Appendix O of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by LAFD in their written correspondence provided in Appendix K of this Draft EIR, the required fire water flow for the Project Site has been set at 6,000 to 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 psi, which corresponds to the Industrial and Commercial land use category.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. Based on the completed IFFAR (see Exhibit 2 of Appendix O of this Draft EIR), all six of the existing public fire hydrants (two on Beverly Boulevard, two on Fairfax Avenue, and two on The Grove Drive) flowing simultaneously can deliver combined flows of 9,000 gpm, which falls within the specified fire flow range for the Project. Therefore, based on the IFFAR, there is adequate fire flow available to serve the Project, and the Project would thus comply with its fire flow requirements.

adjacent properties to the south from The Grove Drive. Refer to Figure II-3 in Section II, Project Description, of this Draft EIR for an illustration.

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, or industrial building must be located within 300 feet of an approved hydrant. As described in the Utility Report, LADWP's initial review of the Project determined that no additional fire hydrants would be required to provide adequate fire coverage. As part of LAFD's fire/life safety plan review for the Project, LAFD would determine whether the hydrant spacing requirements under LAMC Section 57.507.3.2 are met, and the Project would install additional hydrants, as necessary, within the public right-of-way. Furthermore, in accordance with LAMC Section 57.4705.4, the Project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting phase and would reduce the public hydrant demands. **Therefore, through compliance with applicable regulatory requirements, the Project's impacts with respect to fire flow would be less than significant.**

(iv) Conclusion

Based on the analysis above and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2) to provide adequate fire protection services, it is reasonable to conclude that Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service levels; adequate services would be provided by a local jurisdiction; and the Project would not inhibit LAFD emergency response. **Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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. As such, Project impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related 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.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated in 2026, the Project Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2043. The Development Agreement would confer a vested right to develop the Project in accordance with the Specific Plan and a Mitigation Monitoring and Reporting Program (MMRP) throughout the term of the Development Agreement. The Specific Plan and MMRP would continue to regulate development of the Project site and provide for the implementation of all applicable Project design features and mitigation measures associated with any development activities during and beyond the term of the Development Agreement. Additionally, the Project's fire protection requirements would not change with a later buildout date, as such requirements are based on full occupancy and operation of the Project regardless of when they occur. While calls for service and surrounding traffic levels (and therefore response times) could potentially increase in future years due to anticipated growth in the surrounding area, as previously discussed, the City is legally obligated to provide adequate fire protection and emergency medical services in accordance with state law. If the number of incidents in a given area increases, it is LAFD's responsibility to assign new staff and equipment and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. Therefore, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2026 (the Project's anticipated buildout year) includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, there are 68 related projects located in the vicinity of the Project Site. Although Related Project Nos. 26 through 67 are located in the Cities of West Hollywood and Beverly Hills, which are served by other fire departments, LAFD and neighboring fire departments have mutual aid agreements and support each other as needed to respond to emergencies. In addition, some of the related projects may not be built out by 2026, may never be built, or may be approved and built at reduced densities. Furthermore, much of this growth is already anticipated by the City. Nevertheless, to provide a conservative analysis, the future baseline forecast assumes that Related Project Nos. 1 through 68 are fully built out by 2026, unless otherwise noted.

The geographic context for the cumulative impact analysis for fire protection services is the service areas of Fire Station Nos. 61, 41, 27, 58, and 68. The Project, in conjunction with growth forecasted in the City through 2026, would cumulatively generate a

demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection facilities. As stated in the written correspondence from LAFD included in Appendix K of this Draft EIR, development of the Project along with other approved and planned projects in the immediate area may result in the need for increased staffing, additional fire protection facilities, or the relocation of existing fire protection facilities, and LAFD continually evaluates fire station placement and overall LAFD services for the entire City, as well as for specific areas. As with the Project, the related projects and other future development projects in the surrounding area would be required to comply with applicable regulatory requirements related to fire protection. In addition, each related project and other future development projects would be reviewed by LAFD (or the respective fire department) to ensure that sufficient fire safety measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, the Project, related projects, and other future growth would be subject to the standard construction permitting process, which includes review by LAFD (or the respective fire department) for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP (or the respective water supplier) to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

Like the Project, the related projects and other future development projects in the City 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.³⁴ Cumulative increases in demand for fire protection and emergency medical services due to the related projects and other future development projects would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD will 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.

Consistent with the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b.(1) above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special

³⁴ City of Los Angeles, Proposed Budget for the Fiscal Year 2021–22.

apparatuses and possibly station expansions or new station construction, will be identified and allocated according to the priorities at the time. At this time, LAFD has not identified the need for any new stations or station improvements in the Project area either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1.0 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and would not be expected to result in significant impacts. Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

Based on the above, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental 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. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on fire protection services would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related 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.