IV. Environmental Impact Analysis

P. Wildfire

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts related to wildfires. Specifically, the analysis describes the risk of wildfire and wildfire-related hazards at the Project Site, as well as the potential for the Project to increase the risk of wildfire and wildfire-related hazards in the area. In addition, this section evaluates the Project's potential incremental contribution to cumulative wildfire risk resulting from related projects in the Project vicinity. The analysis is based on the Wildfire Hazard and Evacuation Evaluation Technical Memorandum (Wildfire Evaluation) prepared by Dudek and included as in Appendix N of this Draft EIR.[1]

2. Environmental Setting

a. Regulatory Framework

Policies, requirements, and guidelines related to wildfire have been established at the federal, state, and local levels. Potentially applicable regulations and plans include the following:

- National Fire Protection Association Codes, Standards, Practices, and Guides
- California Fire Code & California Building Code
- California Emergency Services Act
- California Standardized Emergency Management System
- California Department of Forestry and Fire Protection
  - California Code of Regulations: Title 14 Division 1.5
  - Fire Hazard Severity Zones

[1] *Dudek, Wildfire Hazard and Evacuation Evaluation Technical Memorandum, June 2025.*

  - State Responsibility Area Maps
  - California Strategic Fire Plan
- Office of the Attorney General Best Practices for Analyzing and Mitigating Wildfire Impacts
- Local Responsibility Area Maps
- County of Los Angeles Operational Emergency Operations Plan
- City of Los Angeles Fire Department Strategic Plan 2023–2026
- City of Los Angeles Base Emergency Operations Plan
- Los Angeles Municipal Code: Fire Code
- City of Los Angeles 2024 Local Hazard Mitigation Plan
- City of Los Angeles General Plan Framework: Safety Element

(1) Federal

(a) National Fire Protection Association Codes, Standards, Practices, and Guides

The National Fire Protection Association (NFPA) develops codes, standards, recommended practices, and guides through a consensus standards development process approved by the American National Standards Institute (ANSI). The consensus standards development process brings together various professionals to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or codes, unless adopted or referenced as such by the California Fire Code (CFC) or local fire agency. Typical standards include: Standard for Portable Fire Extinguishers, Standards for Installation of Sprinkler Systems, National Electrical Code, National Fire Alarm and Signaling Code, Standards for Fire Doors and Other Opening Protectives, Life Safety Code, as well as a number of other standards and codes specific to a building's use and/or occupancy.

(2) State

(a) California Fire Code & California Building Code

The CFC, Part 9 of Title 24 of the California Code of Regulations (CCR), was created by the California Building Standards Commission based on the International Fire Code and is updated every three years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of

fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas (e.g., requirements for defensible space to be installed around structures). The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

Chapter 7A of the California Building Code (CBC) regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a wildland–urban interface fire area. This chapter establishes minimum standards for the protection of life and property by increasing the ability of a building located in any Fire Hazard Severity Zone within State Responsibility Areas or a wildland–urban interface fire area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. New buildings located in such areas are required to comply with Chapter 7A of the CBC. Chapter 7A sets forth the minimum standards for the protection of life and property by increasing the ability of a building to resist the intrusion of flames or burning embers from a vegetation fire and addresses materials and construction methods for reducing exterior wildfire exposure. These measures work to limit the interaction of combustible building materials in a structure with potential wildfire exposure by requiring features such as non-combustible siding, ember resistant vents, and dual pane tempered windows. Refer to Attachment 1 of the Wildfire Evaluation for the specific requirements set forth in Chapter 7A.

The CFC also regulates the use, handling, and storage of hazardous materials at fixed facilities. The CFC and the CBC use a hazards classification system to determine what protective measures are required to protect life and property. The CFC uses a permit system based on hazard classification to ensure that these safety measures are met.

(b) California Emergency Services Act

The California Emergency Services Act (California Government Code §8550, et seq.), provides for the creation of an Office of Emergency Services, assign and coordinate functions and duties to be performed during an emergency, facilitate mutual aid, and assign resources (including manpower and facilities) throughout the state for dealing with any emergency that may occur.

(c) California Standardized Emergency Management System

The Standardized Emergency Management System (SEMS) is the cornerstone of California's emergency response system and the fundamental structure for the response phase of emergency management. The system unifies all elements of California's

emergency management community into a single integrated system and standardizes key elements. SEMS incorporates:

- Incident Command System (ICS)—A field-level emergency response system based on management by objectives.
- Multi/Inter-agency coordination—Affected agencies working together to coordinate allocations of resources and emergency response activities.
- Mutual Aid—A system for obtaining additional emergency resources from non-affected jurisdictions.
- Operational Area Concept—County and its sub-divisions to coordinate damage information, resource requests and emergency response.

(d) California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is tasked with reducing wildfire-related impacts, enhancing California's resources, and conducting emergency response. CAL FIRE is also responsible for the protection of approximately 31 million acres of state responsibility area (SRA) consisting of privately owned wildlands along with administration of private and public forests within the state. At the local level, CAL FIRE provides a variety of services including serving via contract as fire department staff for jurisdictions throughout California. CAL FIRE is responsible for enforcing State of California fire safety codes included in the CCR and California Public Resources Code throughout the SRA.

(i) California Code of Regulations: Title 14 Division 1.5

Title 14 of the CCR, Division 1.5, establishes the regulations for CAL FIRE and is applicable in all SRAs where CAL FIRE is responsible for wildfire. Title 14 of the CCR, Section 1270, et seq., establishes minimum standards for emergency access, fuel modification, setback to property lines, signage, identification of strategic ridgelines and to preserve and limit development on certain areas within undeveloped ridgelines, and water supply.

(ii) Fire Hazard Severity Zones

In accordance with California Public Resources Code Sections 4201-4204, California Code of Regulations Title 14, Section 1280 and California Government Code Sections

51175-89, CAL FIRE has set forth Fire Hazard Severity Zones[2] (FHSZ) to classify the anticipated fire-related hazard for SRAs. The classifications include Moderate, High, and Very High. These fire hazard measurements take into account vegetation, topography, weather, crown fire production, fire history, and ember production and movement.

(iii) State Responsibility Area Maps

CAL FIRE adopted Fire Hazard Severity Zone maps for State Responsibility Areas in November 2007.[3] The maps and related regulations were approved by the Office of Administrative Law. Government Code Section 51179 states the following:

> *A local agency shall designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the director pursuant to subdivisions (b) and (c) of Section 51178. A local agency shall be exempt from this requirement if ordinances of the local agency, adopted on or before December 31, 1992, impose standards that are equivalent to, or more restrictive than, the standards imposed by this chapter.*

(iv) California Strategic Fire Plan

In April 2024, CAL FIRE released the CAL FIRE Strategic Plan 2024—Transforming Tomorrow. This plan outlines CAL FIRE's Mission, Vision, Values, and Goals. Under these three elements, the Strategic Plan focuses on six primary goals: (1) attract, hire, and retain quality employees; (2) ensure all employees understand how the Department's various programs and job duties contribute towards efficiently achieving the CAL FIRE mission; (3) promote a culture that values equitable access, embraces diverse backgrounds and experiences, and actively removes barriers to cultivate a more inclusive environment; (4) leverage technology to modernize internal human resources processes and create efficient and effective innovative solutions to promote, support, and enhance the employee experience; (5) strengthen the Department's physical and digital infrastructure and streamline equitable access to information across core services; and (6) Identify core capabilities and strengthen operational capacity.[4] Also included in the Strategic Plan are objectives to meet each of the six goals.

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[2] *CAL FIRE, Office of the State Fire Marshal, Frequently Asked Questions About: 2023 Fire Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed May 15, 2025.*

[3] *CAL FIRE, Office of the State Fire Marshal, State of California Fire Hazard Severity Zones In State Responsibility Areas, November 7, 2007. www.arcgis.com/home/webmap/viewer.html?webmap=ab80ffe0a139445d8f16a06178720b2b, accessed June 26, 2025.*

[4] *CAL FIRE Strategic Plan, April 2024.*

(e) Office of the Attorney General Best Practices for Analyzing and Mitigating Wildfire Impacts[5]

On October 10, 2022, California Attorney General Rob Bonta issued guidance with best practices and mitigation measures for local governments considering approval of development projects in fire-prone areas. CEQA requires that state and local agencies disclose and evaluate the significant environmental impacts of locating development in areas susceptible to hazardous conditions—such as wildfire—and adopt all feasible mitigation measures to reduce or eliminate those impacts. The Attorney General's guidance is based on the California Department of Justice's experience reviewing, commenting on, and litigating several planned development projects in wildfire prone areas. As summarized in an accompanying press summary, the guidance sets out best practices and mitigation measures for topics including the following. Additional details and qualifications are provided in the Attorney General's guidance document, which is incorporated by reference. As noted in the guidance document itself, the guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project's impacts on wildfire ignition risk, emergency access, and evacuation. The guidance is aimed at proposed development projects, such as residential, recreational, or commercial developments. The extent to which it applies will inherently vary by project, based on project design and location. This document does not impose additional requirements on local governments or alter any applicable laws or regulations. Rather, it is intended to provide guidance on some of the issues, alternatives, and mitigation measures that should be considered during the environmental review process.

- **Project Density:** Project density influences how likely a fire is to start or spread, and how likely it is that the development and its occupants will be in danger when a fire starts. Local governments should strive to increase housing density and consolidate design, relying on higher density infill developments as much as possible.

- **Project Location:** Project placement in the landscape relative to fire history, topography, and wind patterns also influences wildfire risk. Local governments should limit development along steep slopes and amidst rugged terrain to decrease exposure to rapid fire spread and increase accessibility for firefighting.

- **Water Supply and Infrastructure:** As part of evaluating a project's wildfire risk impacts, local governments should analyze the adequacy of water supplies and infrastructure to address firefighting within the project site. Local governments should consider requiring on-site water supply or storage to augment ordinary supplies that may be lost during a wildfire.

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[5] *State of California, Office of the Attorney General, Rob Bonita Attorney General, Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act, October 10, 2022.*

- **Evacuation and Emergency Access:** For projects located in high wildfire risk areas that present an increased risk of ignition and/or evacuation impacts, evacuation modeling and analysis should be considered prior to the development's approval and include evaluation of the capacity of surrounding roadways, project impacts on existing evacuation plans, and proximity to existing fire services, among other factors. Local governments should consider placing developments close to existing road and evacuation infrastructure, and where appropriate, constructing additional roads to facilitate evacuations.

- **Fire Hardening Structures and Homes:** Home hardening has been shown to be an extremely effective measure for preventing structure loss during a wildfire. Local governments should require developers to upgrade building materials and use installation techniques to increase the development's resistance to heat, flames, and embers beyond what is required in applicable building codes.

(3) Local

(a) Local Responsibility Area Maps

Government Code Sections 51175–51189 direct CAL FIRE to identify areas of very high fire hazard severity within Local Responsibility Areas (LRA). These areas are referred to as Very High Fire Hazard Severity Zones (VHFHSZ). VHFHSZs are based on data and models of potential fuels over a 30- to 50-year time horizon, their associated expected fire behavior, and expected burn probabilities, which are used to quantify the likelihood and nature of vegetation fire exposure to buildings. In late 2005, the California Building Commission adopted CBC Chapter 7A (discussed above), which became effective in 2008 and requires new buildings in VHFHSZs to use ignition resistant construction methods and materials. These codes include provisions to improve the ignition resistance of buildings, especially from firebrands. VHFHSZs are used by building officials for new building permits in LRAs. The zones are also used to identify property whose owners must comply with natural hazards disclosure requirements at the time of property sale and defensible space clearance requirements.

On March 24, 2025, CAL Fire issued the Recommended VHFHSZ maps for Southern California, including the City of Los Angeles. CAL FIRE's updated mapping has extended the VHFHSZ areas due to new model algorithms and the wind inputs that are increasing ember cast distances. Within LRAs, CAL FIRE has also mapped High and Moderate FHSZs, which were not previously mapped for these areas.

(b) County of Los Angeles Operational Emergency Operations Plan

The County of Los Angeles Operational Emergency Operations Plan (November 2023) addresses both the County's planned response to extraordinary emergency situations impacting unincorporated areas of the County as well as Operational Area coordination. This

plan focuses on the operational concepts related to all-hazards emergency response and recovery, including maintaining the County's continued compliance with the National Response Framework (NRF), National Incident Management System (NIMS), National Disaster Recovery Framework (NDRF), California SEMS, principles of the ICS, and the National Preparedness Goal. It facilitates multiagency and multi-jurisdictional coordination during emergency operations, public information functions, resource management, and recovery efforts.

(c) City of Los Angeles Fire Department Strategic Plan 2023–2026

The City of Los Angeles Fire Department's (LAFD's) 2023–2026 Strategic Plan[6]: identifies the vision for LAFD as a premier, all-risk public safety and emergency service provider that exceeds the expectations of the diverse communities it serves, and identifies LAFD's mission as to preserve life, protect, property, and safeguard our communities through relentless commitment to emergency preparedness, prevention, response, and recovery. LAFD's Strategic Plan also identifies seven goals, including: (1) deliver exceptional public safety and emergency service; (2) promote a safe, healthy, and progressive work environment that effectively manages personal and organizational risk; (3) commit to an organizational culture that embraces diversity, equity, and inclusion; (4) improve collaboration, participative leadership, and responsible performance management; (5) foster personal growth, professional development, and organizational succession; (6) explore, implement, and integrate technological innovations and advancements; and (7) enhance community resilience, disaster recovery capabilities, and environmental sustainability. Each of these goals include a number of strategies aimed at providing communities and the public with fire protection, emergency medical services, preservation of life and property, and promoting public safety.

(d) City of Los Angeles Base Emergency Operations Plan

The 2023 Los Angeles Emergency Operations Plan has various functional annexes relevant to evacuation including Emergency Alert and Warning, Emergency Public Information, Mass Care and Sheltering, and a brush fire annex that demonstrates careful forethought for carrying out various types of evacuations. Should an evacuation impact the Project area, the emergency response agencies would be prepared to carry out various strategies such as phased evacuations to move occupants that are more imminently threatened prior to occupants that are not imminently threatened, traffic control to include manually staffing intersections to move evacuees quickly and effectively and deploy signs and security to prevent unauthorized traffic movement.

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[6] *City of Los Angeles, Los Angeles Fire Department, Strategic Plan 2023–2026, www.lafd.org/sites/default/files/pdf_files/LAFD-2023-2026-STRATEGIC-PLAN-04042023%20.pdf, accessed May 6, 2025.*

The Los Angeles Police Department (LAPD) is the primary agency responsible for conducting evacuations within the Los Angeles City boundaries, which includes the Project Site. If necessary, Unified Command will assess and evaluate the need for evacuations with cooperating agencies, and LAPD or local law enforcement orders and conducts evacuations according to established procedures, which are outlined in the City Emergency Operations Plan Evacuation Functional Support Annex. Other City departments with resources to support the evacuation may be called to serve in secondary support roles as the situation deems necessary including: Port of Los Angeles Police Department, Los Angeles World Airports (LAWA) Police, Recreation and Parks Rangers, and Los Angeles Animal Services (Animal Services) Animal Control Officers. LAFD will support evacuation in cooperation with the Incident Command Post or Unified Command.

Among the methods available to citizens for emergency information are radio, television, social media/internet, neighborhood patrol car, aerial public address notifications, and Reverse 911 or Notify LA. The City of Los Angeles utilizes Notify LA for its Community Emergency Notification System. Notify LA is a regional notification system that sends telephone notifications to occupants and businesses within areas in the City impacted by, or in danger of being impacted by, an emergency or disaster. Notify LA allows key public safety City departments to initiate voice messages, text messages and e-mails to the public based on their geographic location. Examples of emergency notifications include evacuation notices, shelter-in-place notices and imminent threats to life or property. Additional information on emergency notifications as well as the criteria for sending a Notify LA alert is listed in the 2022 City of Los Angeles Emergency Operations Plan Emergency Alert and Warning Functional Support Annex.

(e) Los Angeles Municipal Code: Fire Code

The City of Los Angeles Fire Code, Article 7, Chapter V of the LAMC, consists of the CFC with Los Angeles–specific amendments that are further restrictive. The Fire Code establishes the minimum requirements consistent with nationally recognized good practices for providing a reasonable level of life safety and property protection for the hazards of fire, explosion, panic, or dangerous conditions in new and existing buildings, structures, or premises. The Fire Code also establishes requirements to provide a reasonable level of safety to firefighters and emergency responders during emergency operations.[7] Notable for development in VHFHSZs, the Los Angeles Fire Code and Section 57.322 of the LAMC require that owners of property located in VHFHSZs maintain 200-foot-wide wildfire fuel modification areas called Fire Management Zones (FMZs) within 200 feet of any structure/buildings and within 10 feet of any combustible fence or roadway/driveway used for vehicular travel. The purpose of FMZs is to remove fuels from the fire pathway thereby starving a potential fire in order to prevent an off-site wildfire from progressing into and

[7] *LAMC 57.101.3.*

endangering the Project. Similarly, the FMZs prevent a potential fire at the Project site from progressing into the wildland. The first 100 feet surrounding a structure has greater requirements than the second 100 feet. The requirements for FMZs as required by the LAMC in Section 57.4906.5.1.1.1 are as follows:

- 1st 100 Feet (LAMC Section 57.4906.5.1.1.1-4906.5.1.1.6)
  - Maintain property free of dead vegetation
  - Mow all grasses to three inches
  - Maintain trees and ornamental shrubbery or plants including irrigation and thinning
  - Space all native shrubs 18 feet from one another
  - Limb up all trees 6 feet or 1/3 the height of the tree whichever is less
  - Maintain 10 feet within roadsides clear of combustible vegetation; ornamental vegetation is allowed.
- 2nd 100 feet (LAMC Section 57.4906.5.1.1.7)
  - Remove hazardous vegetation and combustible growth

The Los Angeles Fire Code also incorporates Chapter 5 and Appendix D of the CFC regarding roadways, Section 507 of the CFC regarding fire protection water supply, and Chapter 49 of the CFC regarding wildfire requirements.

(f) City of Los Angeles 2024 Local Hazard Mitigation Plan

The City of Los Angeles 2024 Local Hazard Mitigation Plan (HMP) is the third comprehensive update to the City's hazard mitigation plan, meeting federal requirements for regular review and update of hazard mitigation plans. Chapter 18 of the HMP addresses the potential for wildfires, wildfire mapping, wildfire responsibility areas, the history of wildfires in the City, vulnerability to wildfires, and impacts associated with wildfires. This Chapter also addresses future vulnerability to wildfire associated with climate change.

(g) City of Los Angeles General Plan: Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 24, 2021, provides a broad framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster.

Included in the Safety Element are various goals, objectives, policies, and programs related to wildfire.[8]

b. Existing Conditions

(1) Existing Project Site Characteristics

The Project Site is partially developed, with portions of the Project Site currently used for transportation operations and maintenance-related facilities, bus parking, and construction staging. The Project Site's topography consists of a south-facing sloped area with ground cover that spans from the North Parcel to the South Parcel until reaching the vicinity of Mandarin Plaza, at which point the South Parcel becomes mostly paved. The sloped area faces towards the Metro A Line tracks and the Los Angeles State Historic Park and consists mainly of undeveloped land with vegetation (e.g. grasses and weeds), with some remnants of concrete foundations/footings, and retaining walls. Chain link fencing is located along the perimeter of the Project Site between North Broadway and the Metro A Line tracks. The Project Site includes 20 existing on-site trees consisting of Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), and desert fan palm (*Washingtonia filifera*) and three street trees consisting of jacaranda trees (*jacaranda mimosafolia*), none of which are protected under the City's Protected Tree and Shrubs Ordinance No. 186,873.

Existing access to the South Parcel is located via a gated driveway on North Broadway across from St. Peter's Italian Catholic Church as well as an existing easement from North Spring Street, which crosses under the elevated Metro A Line tracks at the southeastern corner of the South Parcel. The South Parcel is largely paved and partially developed with structures associated with transportation operations and maintenance-related facilities including an approximately 12,800-square-foot rectangular one-story metal auto repair building located in the southern portion of the South Parcel, with vehicle bays and roll-up doors, as well as a vehicle shelter/wash bay, trash enclosure, paved surface parking areas, paved outdoor storage yard, utility infrastructure, retaining walls, concrete foundations/ footings, and fencing. Additionally, an approximately 2,132-square-foot addition to the rear of an existing off-site restaurant (the Golden Dragon Restaurant) and associated parking that encroaches onto the Project Site is located in the southwestern portion of the South Parcel. Access to the North Parcel is currently provided via two gated entryways along North Broadway, with one across from Solano Avenue and the other at the northeastern corner of the North Parcel. The North Parcel includes foundation remnants and graded areas, and is generally used for construction staging and bus parking. There are no existing buildings on the North Parcel.

[8] *City of Los Angeles Department of City Planning, Safety Element, November 24, 2021, originally adopted August 8, 1996.*

(2) Project Vicinity Evacuation

Within the City, communities are divided into evacuation zones to geographically designate neighborhoods and communities that may experience a simultaneous threat. By doing this, emergency managers are able to implement phased evacuation to move occupants in areas facing imminent danger prior to moving those in areas that are not directly threatened. The Project Site is located in zone LFD-1063A.[9] In the case of a wildfire that threatens the Project area, the surrounding zones may also be included in an evacuation depending on the movement of the wildfire. As shown in Figure 7 of the wildfire evaluation, these zones include LFD-1063B, LFD-1001, LFD-1061, LFD-1059, LFD-1057, LFD-1165, LFD-1167, LFD-1065, LFD-1067, LFD-1003, and LFD-0939.

Evacuation routes in the area include access to multiple freeways, including I-5, SR-101, and SR-110, as well as a number of arterial roadways including North Broadway, Cesar E. Chavez Avenue, and Main Street. I-5 in this area has four mainline lanes in each direction, SR-110 has three mainline lanes in each direction, and SR-101 has four mainline lanes in each direction.

(3) Project Area Wildfire Environment

(a) Fire Hazard Severity Zones

As shown in Figure IV.P-1 on page IV.P-13, the Project Site lies within an area recently mapped as a primarily VHFHSZ with a very small portion in the South Parcel mapped as High Fire Hazard Severity Zone (HFHSZ), as designated by CAL FIRE.[10] Fire hazard designations are based on topography, vegetation, and weather, amongst other factors. The VHFHSZ designation does not indicate that an area is not safe for development. It does indicate that specific fire protection features that minimize structure vulnerability will be required, including Chapter 7A of the CBC as adopted by reference with local amendments in the Los Angeles Building Code and provisions for maintained fuel modification zones, amongst others.

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[9] *Genasys Protect, https://protect.genasys.com/zones/US-CA-XLA-LFD-1063?searchTerm=1251+N+Spring+St%2C+Los+Angeles%2C+CA%2C+90012%2C+USA&coords=34.06504298284%2C-118.235812000109&z=13.415376229525455&latlon=34.06813315957103%2C-118.2339271032535, accessed June 25, 2025*

[10] *CAL FIRE, Fire Hazard Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed June 25, 2025*

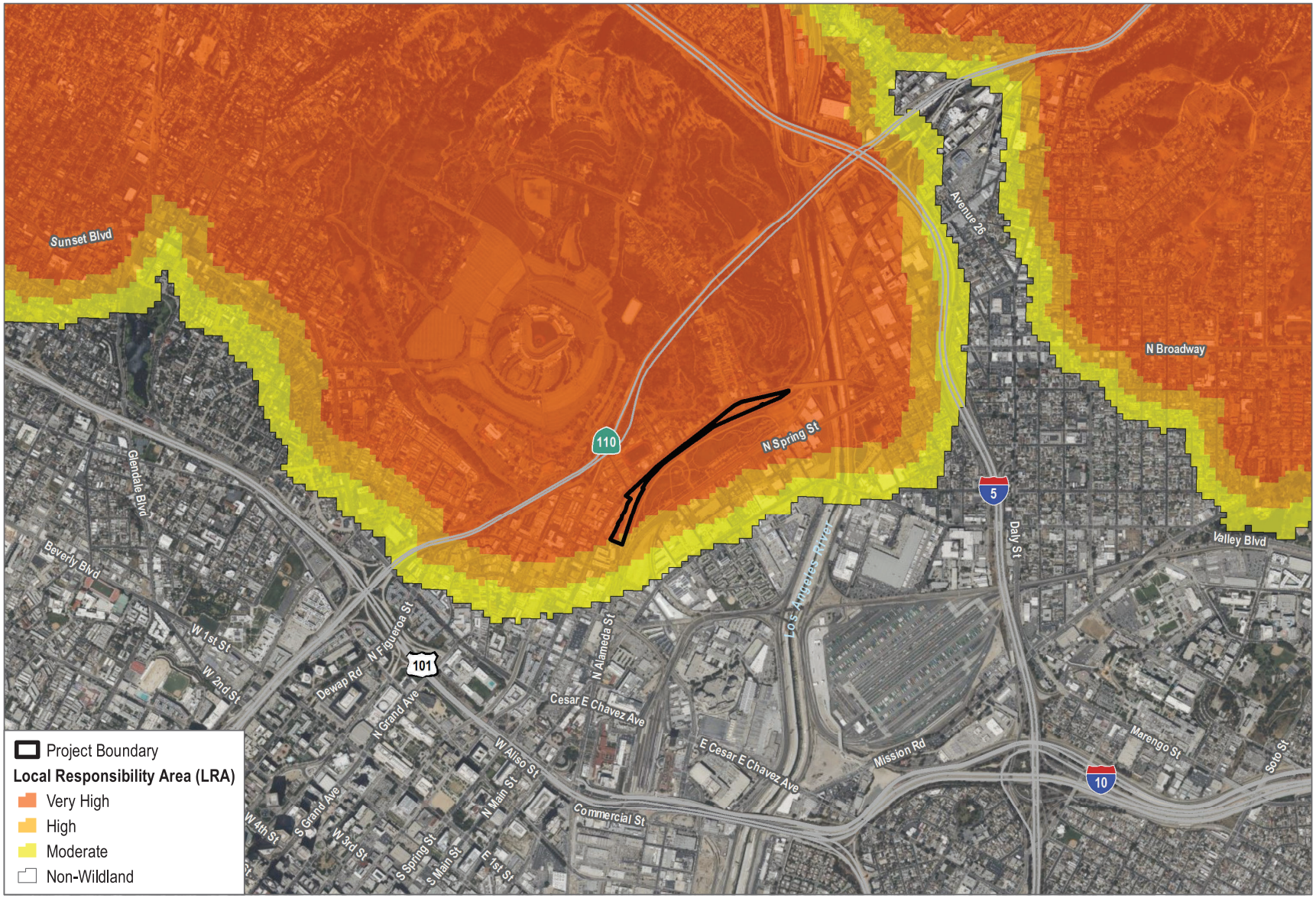

Figure IV.P-1
Fire Hazard Map for Project Vicinity

Source:Dudek, 2025.

According to CalFire, it is important to note that the Fire Hazard Severity Zone map promulgated by CalFire evaluates "hazard," not "risk.[11]" The map is like flood zone maps, where lands are described in terms of the probability level of a particular area being inundated by floodwaters, and not specifically prescriptive of impacts.

"Hazard" is based on the physical conditions that create a likelihood and expected fire behavior over a 30 to 50-year period without considering mitigation measures such as building hardening, recent wildfire, or fuel reduction efforts. Further, "hazard" is a property of the potential fire behavior (flame length, crown fire occurrence, capacity to generate embers) in the likely mature vegetation of a given area. "Risk" is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction. "Risk" is the potential for structural loss from said fire. High hazard does not result in high risk if the building or community mitigates the hazard.

Thus, even if there is potential low fire hazard in a given area (expected low flame lengths), a given building might be at high risk of ignition if the physical characteristics of the property would facilitate structural ignition (e.g., flammable vegetation next to a building with wood siding). Conversely (and more apropos to the Project Site), a building might be in a high-hazard area (potential exposure to ember generation) but may actually be at low risk of ignition if the building is built with ignition-resistant construction materials and adequate defensible space is provided around the building. This is especially true in the Project vicinity where irrigated and maintained landscapes, large expanses of paving and roads, are provided over large areas and precludes unmaintained fuels near the buildings.

While the Project is located in a designated VHFHSZ, the Project Site is located in a largely urbanized area, and thus will have significantly lower potential of actual loss, or "risk," than older communities with buildings that do not utilize ignition-resistant construction materials and defensible space that are now required by Fire Code. This is similarly relevant to older buildings that occur within the Project vicinity. This reasoning is based upon the aforementioned distinction between "hazard" (which the State categorizes) and "risk" (which the State does not quantify).

(b) Fire History

Fire History is utilized to generally determine if a Project is likely to be exposed to wildfire. There have been four fires in the vicinity of the Project, with the latest occurring in 1981. The closest and most recent fire was in 1966 directly across from the northern structure.

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[11] *CAL FIRE, Fire Hazard Severity Zones, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed June 25, 2025*

(c) Vegetation/Fuels

The Project Site is presently vegetated with invasive non-native grasses, weeds, and palm trees. The Project Site is primarily infill and does not directly interface with off-site vegetation. Both the South Parcel and North Parcel are surrounded by immediate adjacent areas with paved surfaces, structures, or Metro A-Line tracks. Broadway is approximately 75 feet in width and void of vegetation which could be fuel for an approaching fire, thereby acting as a fuel break that prohibits transmission of fire. The LA River similarly is nearly 400 feet across and runs North to South, just east of the northern boundary of the Project Site with no vegetation and an active water way which represents a complete fuel break. The Metro A-Line track area adjacent to the Project Site is approximately 85 feet in width and also represents a complete fuel break due to the complete removal of vegetation.

Beyond the immediate adjacencies, the South Parcel interfaces with the Los Angeles State Historic Park to the south which is a maintained and irrigated park. The North Parcel also interfaces with the Los Angeles State Historic Park to the south as well as Buena Vista Hill Elysian Park to the north across Broadway. The vegetation to the north of the North Parcel is within the Buena Vista Hill Elysian Park and is classified as Western Warm Temperate Urban Shrubland by Landfire, a federal wildfire resource providing landscape scale geo-spatial products, but appears to consist of mowed/maintained grass and sparse trees[12]. The Los Angeles State Historic Park to the south is classified by Landfire as "developed" due to its maintenance and irrigation.

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (leaf size, branching patterns), and overall fuel loading. The existing vegetation on the Project Site and to the south consists of grass and weeds and would be expected to burn quickly due to the small size of the fuel source. The trees and grass in Elysian Park are well maintained and unlikely to ignite due to fuel moisture and separation of fuels yet unmitigated ignition could result in a slow-moving crown fire.

(d) Terrain

The terrain of the Project Site is relatively flat with a slight gradient from south to north up towards Broadway. The narrow portion in the center of the Project Site is sloped from south to north, directly adjacent to the Metro Rail Right-of-Way. The Metro Rail tracks from

[12] *Landfire (Landscape Fire and Resource Management Planning Tools), is a shared program between the wildland fire management programs of the U.S. Department of Agriculture Forest Service and U.S. Department of the Interior, providing landscape scale geo-spatial products to support cross-boundary planning, management, and operations, www.landfire.gov/viewer/, accessed June 4, 2025.*

Union Station to the south to Highland Park to the northeast in a varied alignment, but generally to the east of the Project Site. To the east of the Project Site, the LA River is 400 feet across and runs north to South. Both the Metro Rail tracks and the LA River are constructed of flame resistant materials acting as a fire break due to their width and low risk of ignition. At a community level, the surrounding area to the north is hilly with a general downward gradient from north to south. Dodger Stadium and substantial paved parking areas are located on the top of manufactured slopes to the north of the Project area. The hilly topography in Elysin Park to the north creates small canyons that are occupied by residences.

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower spread down-slope. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind. It is possible that the canyons to the north could funnel offshore winds towards the Project Site.

(e) Weather

The Project Site, like much of Southern California, is influenced by the Pacific Ocean and a seasonal, migratory subtropical high-pressure cell known as the “Pacific High.” The Project Site is located within the Transverse Range and is situated approximately 16 miles east of the Pacific Ocean. The City of Los Angeles has a Mediterranean climate with cool, wet winters and warm, dry summers. According to the Western Regional Climate Center, August on average is the warmest month with an average high temperature of 82.5 degrees Fahrenheit (°F) and an average monthly normal of 73°F. February is the coolest month on average with an average low temperature of 49.3°F and an average monthly normal of 55.1°F. Rainfall occurs primarily between October and April, with the maximum average precipitation occurring in February. The average annual rainfall for the Project Site is approximately 18 inches.

As discussed in the Wildfire Evaluation, from a regional perspective, the fire risk in southern California can be divided into three distinct “seasons.” The first season, the most active season and covering the summer months, extends from late May to late September. This is followed by an intense fall season characterized by fewer but larger fires. The season begins in late September and continues until early November. The remaining months, November to late May cover the mostly dormant, winter season. Large fires in the region consistently occur at the end of wet periods and the beginning of droughts. In addition, fire history in recent years and additional research suggests that fire season for larger fires is lengthening in southern California due to changing climatic patterns and the increased frequency of extreme fire weather. Typically, the highest fire danger in southern California coincides with Santa Ana winds. The Santa Ana wind conditions are a reversal of the

prevailing southwesterly winds that usually occur on a region-wide basis near the end of fire season during late summer and early fall. They are dry, warm winds that flow from the higher desert elevations in the east through the mountain passes and canyons. As they converge through the canyons, their velocities increase. Consequently, peak velocities are highest at the mouths of canyons and dissipate as they spread across valley floors. Localized wind patterns on the Project Site are strongly affected by both regional and local topography.

The prevailing wind pattern is from the west (onshore), but the presence of the Pacific Ocean causes a diurnal wind pattern known as the land/sea breeze system. During the day, winds are from the west–southwest (sea), and at night winds are from the northeast (land), averaging 5 miles per hour (mph). During the summer season, the diurnal winds may average slightly higher (approximately 19 mph) than the winds during the winter season due to greater pressure gradient forces. Surface winds can also be influenced locally by topography and slope variations. The highest wind velocities are associated with downslope, canyon, and Santa Ana winds. The Project Site is not located in an area that would be expected to include unusual wind patterns based on terrain. However, the Project Site is subject to periodic extreme fire weather climate conditions that occur throughout Los Angeles.

(f) Water Supply

Per the 2024 Water and Sewer Infrastructure Report included as Appendix M.1 of this Draft EIR, available record drawings provided by the City show that there are existing water mains along North Broadway, a 24-inch line and a 40-inch line. Additionally, there is an existing 12-inch water main along North Spring Street. There are also nine existing fire hydrants within 300 feet of the Project Site.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

Section 15126.2(a) of the CEQA Guidelines states when discussing impacts, an EIR shall identify and focus on the significant effects of the proposed project on the environment. Direct and indirect significant effects of the Project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and

public services. The EIR shall also analyze any significant environmental effects the Project might cause or risk exacerbating by bringing development and people into the area affected. For example, the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (including wildfire risk areas), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazards areas.

In accordance with Appendix G of the CEQA Guidelines section 15126.2(a), a project would have a significant impact related to wildfire if located in or near a SRA or lands classified as a VHFHSZ and would result in any of the following impacts to future residents or users:

Threshold (a): Substantially impair an adopted emergency response plan or emergency evacuation plan?

Threshold (b): Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Threshold (c): Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Threshold (d): Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

In addition, as discussed above, the Office of the Attorney General Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects under the California Environmental Quality Act (AG Guidelines) require a broad analysis of whether a project would "expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires", including whether a project may create or exacerbate off-site wildfire risk.[13] The analysis of these issues is provided in the impact analysis under Threshold (b), below. Also refer to Section IV.G, Hazards and Hazardous materials regarding risk associated with wildland files and emergency access.

[13] *State of California, Office of the Attorney General, Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects under the California Environmental Quality Act, October 10, 2022.*

b. Methodology

(1) Evacuation Analysis

Safely undertaking large-scale evacuations is a complicated process that involves many factors that cannot necessarily be determined in advance. Evacuations are fluid and timeframes may vary widely depending on numerous factors, including, among other things, the number of vehicles evacuating, the road capacity to accommodate evacuating vehicles, occupants' awareness and preparedness, evacuation messaging and direction, and on-site law enforcement control.

Neither CEQA, nor the City has adopted numerical time standards for determining whether an evacuation timeframe is appropriate. This is primarily because every location and fire scenario are unique. While it may take one community 20 minutes to evacuate safely, it is not a valid assumption to consider a 3-hour evacuation for another community as unsafe. The 3-hour evacuation can be very safe while the 20-minute evacuation may be unsafe due to the conditions and exposures along the evacuation routes. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. As outlined in Appendix G of the CEQA Guidelines, the City considers a Project's impact on evacuation significant if the Project will substantially impair or physically interfere with implementation of an adopted emergency response or evacuation plan; or if the Project will expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

As discussed in the Wildfire Evaluation, an evacuation is considered to be safe if evacuees evacuate before a wildfire threatens their structures and evacuation roadways. Simply, the amount of time required to evacuate the Project should be less than the time available to evacuate. The available time is increased by providing alternate routes, protecting the roadways, and hardening the structures. A major component of this evaluation must be the vulnerability of the structure and roadways to wildfire, so that credit is given or debited against a project that hardens structures and roadways, or fails to harden structures or roadways respectively. While the Wildfire Evaluation focuses on the various factors affecting available evacuation time and required evacuation time, it is contextualized by the actual wildfire environment and the susceptibility of structures and roadways to becoming impaired by wildfire.

To evaluate potential impacts associated with evacuation during a wildfire, the Wildfire Evaluation uses the evacuation zones identified in the Project vicinity and overlays these zones with current census data to identify the number of occupants in the vicinity and also estimate the number of vehicles available to evacuate the area. The analysis also assumes a worst case scenario in which Dodger Stadium, a nearby sports venue with the one of the largest capacities in the country, would need to evacuate. The analysis then reviews

evacuation routes, emergency access, resiliency of the Project Site and surrounding area to fires, and ability to shelter in place. The analysis also considers the various programs and plans in place (see Subsection 2.a, Regulatory Framework, above) to provide for emergency evacuation.

As discussed in the Wildfire Evaluation, occupants of the area are considered safe when they reach an area that is no longer directly exposed to open space. In simple terms, this would essentially be anywhere that does not have an immediate interface with Elysian Park.

The Los Angeles City Emergency Operations Base Plan (2023) and Evacuation Annex (2020) provide a framework for evacuating any evacuation zone within the City and is responsive to the unique factors surrounding each evacuation.[14] The Project Site is located in evacuation zone LFD-1063A. In the case of a wildfire that threatens the Project area, the surrounding zones may also be included in an evacuation depending on the movement of the wildfire. As shown in Figure 7 of the wildfire evaluation, these zones include LFD-1001, LFD-1061, LFD-1059, LFD-1057, LFD-1063B, LFD-1165, LFD-1167, LFD-1065, LFD-1067, LFD-1003, and LFD-0939. The additional traffic from the Project was analyzed, contextualized by existing traffic.

(2) Wildfire Analysis

The wildfire analysis in the Wildfire Evaluation is based on the latest mapping from CAL FIRE and takes into consideration the fire history of the Project vicinity as well as existing conditions in the Project vicinity such as vegetation/fuels, terrain, weather/climate, water supply, and surrounding development. The analysis also provides a detailed review the Project's consistency with the primary applicable fire and building codes related to wildfire that apply to the Project. All of these components were reviewed by Dudek to determine whether the Project would exacerbate impacts associated with wildfires.

c. Project Design Features

(1) Project Design Features

The Project will implement TR-PDF-1, as set forth in Section IV.M, Transportation, of this Draft EIR, which will require implementation of a Construction Staging and Traffic Management Plan (CSTMP) that includes provisions for maintaining adequate access,

[14] *Los Angeles City Emergency Operations Base Plan (2023) and Evacuation Annex (2020), https:// emergency.lacity.gov/emergency-plans-annexes, accessed July 2, 2025.*

including emergency access, during Project construction. Further the Project would include the Project Design Features set forth below.

Project Design Feature WI- PDF-1: Requires the area 0–5 feet from a structure to be ember resistant consistent with the following:

- Use hardscape including but not limited to gravel, pavers, or concrete. No combustible bark or mulch shall be used permitted within the 0-5 feet from a structure
- Remove all dead and dying plants, weeds, and debris (leaves, needles, etc.) from the roof, gutter, deck, porch, stairways, and under any areas of the structure. To be maintained twice annually, in early summer after the growing season and fall to eliminate regrowth
- Limited landscape plantings shall be irrigated and low-growing properly spaced fire-resistant herbaceous (non-woody) plants.

d. Analysis of Project Impacts

Threshold (a): Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

(1) Impact Analysis

(a) Construction

While Project construction activities would include the on-site use and storage of combustible materials such a fuels, oils, paints, would, etc., these materials would be used and stored in accordance with manufacturer specifications and applicable regulations to avoid the potential for a wildfire.

Furthermore, Project construction activities would be short term and temporary, and while a limited amount of off-site construction activities would occur associated with utility infrastructure improvements, as discussed in Section IV.M, Transportation, of this Draft EIR, TR-PDF-1 would be implemented to require preparation and implementation of a CSTMP. This CSTMP would include strategies to maintain traffic flow and ensure that access in the Project area, including emergency access, would be maintained at all times. Specifically, in the event of a temporary lane closure, access to lanes in both directions would continue to be provided. The CSTMP, would be subject to review and approval by LADOT, LAFD, and LAPD, all agencies which are responsible for evacuation operations as defined in the Evacuation Annex of the Emergency Operations Master Plan and Master Procedures and Annexes. The review and approval by responsible agencies would preclude any measures that would impair emergency response and evacuation.

Based on the above, construction of the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

(b) Operation

As discussed within the Wildfire Evaluation, for conservative planning purposes, it is customary to identify the worst-case scenario and thereby expose potential weaknesses. The worst-case scenario tests the adopted emergency response plans and aids in determining of the Project impairs the plan or could successfully be served by the plan. The worst time and most conservative analysis for an evacuation would be a weeknight on a Dodgers game day when all residents of the Project and the surrounding communities are at home, employees of the restaurant and retail components of the Project are still on-site, the Dodger Stadium is filled to capacity, freeways are experiencing rush-hour traffic, and all occupants of the area would need to evacuate.

Utilizing the evacuation zones identified above and overlaying those zones on current US Census data, the total number of occupants in this evacuation scenario is expected to be about 112,275 persons that reside in 14,309 households in the zones identified above and up to 57,000 persons at Dodger Stadium which represents a sold-out “at capacity” game and up to 1,000 Dodgers staff/players. Census data further provides that the average vehicles per household in this area is 2.03 vehicles per household. While it is more likely that Project occupants residing in the same household would share a vehicle to evacuate, for conservative planning a factor of 2.03 is utilized. This results in an estimated 29,047 evacuating vehicles from residences in the Project area. In addition to this, the total parking capacity of Dodger Stadium is 16,000 spaces, meaning there could be up to that many vehicles evacuating the stadium during a sold-out game.

As discussed above, evacuation routes in the area are abundant with access to multiple freeways including I-5, SR-101, and SR-110 which aid in quickly moving occupants from the area. For reference, a basic freeway segment is expected to move approximately 2,250 vehicles per hour per lane at free flow speeds of 55 mph (all three freeways have posted speed limits of 55 mph in this area), however, it must be noted that other existing roadway geometrics or traffic conditions (e.g., rush hour traffic, visibility, terrain, etc.) would influence the capacity of these freeway segments. For example, data recorded in the Cal Trans PEMS database indicates that the average rush hour speed on a weekday measured between 3 P.M. and 6 P.M. on US-101 North at California Postmile 1.08 (Broadway Off-Ramp) is 15 mph, I-5 North at California Postmile 20 (between Pasadena Avenue and Humboldt Street) is 24 mph and SR-110 South at California Postmile 24.46 (Between College Street and Stadium Way) is 25 mph resulting in traffic flow per lane of approximately 700, 1,300 and 1,300 vehicles per lane per hour respectively. Similarly, data recorded during morning rush hour on a weekday measured between 8 A.M. and 9 A.M. on

US-101 South at California Postmile 1.08 (Broadway Off-Ramp) is 35 mph, I-5 South at California Postmile 19.45 (adjacent to Mozart Street) is 34 mph and SR-110 North at California Postmile 24.46 (Between College Street and Stadium Way) is 59 mph resulting in traffic flow per lane of approximately 1,650, 1,600 and 2,250 vehicles per lane per hour respectively.

To limit the impacts of such conditions, it is expected that law enforcement would close freeways to allow for increased speeds moving away from the evacuation area, though this would add a nominal amount of speed to the evacuation overall. Thus, for the purposes of this analysis, the freeway flow in the immediate vicinity during an evacuation is conservatively set to 15 mph to reflect evacuation conditions. I-5 in this area has four mainline lanes in each direction, SR-110 has three mainline lanes in each direction, and SR 101 has four mainline lanes each direction. All directions lead to safety, resulting in 22 lanes at 700 vehicles per hour per lane, or approximately 15,400 vehicles per hour[15] if evacuees are split evenly amongst all lanes under evacuation conditions.

Because of the vast connectivity of the freeways, evacuees can be considered safe when they get to the freeways, if not sooner, as explained below. The limiting factor to accessing these freeways would be the roads and on-ramps that connect occupants to the freeways, which have smaller capacities; however traffic control as explained in the various emergency planning documents would greatly aid evacuations. Additionally, there are dozens of on- and off-ramps available to evacuees to access the freeway. The Project operations do not propose to limit capacity of or close any of these roadways or on-ramps.

A unique additional consideration is that the Metro A-Line provides more evacuation capacity and could be used to hasten evacuations of the area, similar to how an elevator can be commandeered to aid in building evacuations.

As discussed above, occupants of the area are considered safe when they reach an area that is no longer directly exposed to open space. Essentially, this would be anywhere that does not have an immediate interface with Elysian Park. To further reduce stress on evacuation routes, Emergency Managers could opt to not evacuate Dodger Stadium on account of the expansive paved parking areas that separate the stadium from the open space of Elysian Park in order to safely shelter-in-place the occupants of the stadium as opposed to making them drive through the open space.

The Project adds up to 1,477 parking spaces and therefore up to 1,477 evacuating vehicles to the existing area. This estimate is conservative in that it does not account for occupants evacuating in the same vehicle, and leaving behind a vehicle. Expressed as a

[15] *22 Lanes x 700 vehicles per hour = 15,400 vehicles per hour*

percentage change, the Project adds 5.1 percent more vehicles to the evacuating area when considering households and not considering Dodger Stadium, or 3.3 percent more vehicles if considering all households and the addition of evacuees from Dodger Stadium. The Project also has multiple points of connection for Project occupants to access Broadway and Spring Street. The Project proposes a pedestrian crossing (beacon) which will not impact evacuation. This increase in evacuating vehicles does not substantially impair an adopted emergency response plan or emergency evacuation plan, nor does the Project cut-off or modify any existing evacuation routes. Rather, the Project converts partially vegetated undeveloped land with the potential to transmit fire into hardened structures and maintained landscaping, thereby reducing potential wildfire exposure to occupants of existing land uses that would be evacuating along Broadway.

As discussed below under the analysis for Threshold (b), heat and flame from wildfire is not expected to directly impact the Project Site. However, embers could impact the Project Site. Considering the South Parcel individually, it is completely separated from potential wildfire exposure and highly unlikely to be evacuated. While the LA State Historic Park does present vegetation, ongoing maintenance and irrigation does not lead the vegetation to support combustion. Further, a fire in the Park would be considered a vegetation fire, not a wildfire given the absence of wildland, and is likely to be quickly extinguished due to easy and abundant accessibility for fire crews. Therefore, it is possible that emergency managers do not need to evacuate the Project Site. While this also applies to the North Parcel, the North Parcel does have line of sight contact with potential wildfire exposure. By building to Chapter 7A of the LABC, the Project Site would be resistant to ignition by embers. Should individuals self-select for evacuation, meaning they leave prior to an evacuation order, they would be considered safe as soon as they reach Broadway west of Bishops Road or Broadway east of the Los Angeles River. In the event a fire directly adjacent to the Project alongside the existing Solano Canyon Community, evacuees would be directed either direction on Broadway Avenue away from the fire and considered safe after traveling approximately 1,200 feet west past Bishops Road or 1,200 feet east past the Metro A-line tracks. Further, conditions along the majority of the evacuation routes are developed, meaning that wildfire will not directly impact evacuees.

The Project does not preclude local jurisdictions or emergency personnel to conduct evacuations. Due to its location, the Project would also provide the responding emergency managers (e.g., incident commander, Los Angeles County Sheriff) the alternative option of recommending that all or a portion of the on-site population shelter in place due to construction type, ignition resistance, and defensible space zones. This on-site sheltering option is a contingency plan identified in the Evacuation Annex, but an important option in the scenario when evacuation is considered infeasible or the less safe option. This would provide emergency managers with a safer alternative to risking a late evacuation.

As discussed in Subsection 2.a, Regulatory Framework, above, the City and County have established emergency operation plans that provide specific coordinated strategies and procedures during an evacuation. As discussed in the Wildfire Evaluation, technological advancements and improved evacuation strategies learned from prior wildfire evacuation events have resulted in a system that is many times more capable of managing evacuations. The LA City Emergency plans provide a framework for responding to all emergency types and allow for flexibility to address the unique situations that may arise during an incident through use of modern technology to communicate evacuation alerts to specific evacuation areas. With the technology in use today in the City such as smart phones and emergency alerting, evacuations are more strategic and surgical than in the past, evacuating smaller areas which are at the highest risk and phasing evacuation traffic so that it flows more evenly and minimizes the surges that may slow an evacuation. Mass evacuation scenarios where large populations are all directed to leave simultaneously, resulting in traffic delays, are thereby avoided, and those populations most at risk populations can safely evacuate. This technology also allows Emergency Managers to recognize structures such as the Project that can be used to shelter would-be evacuees, provide temporary refuge, and thereby keep streets clear for evacuees of areas and structures that are actually susceptible to loss from a wildfire.

Overall, safe evacuation of the Project and surrounding community would not be expected to expose people or structures to a significant risk of loss, injury, death, or substantially impair an adopted emergency response plan or emergency evacuation plan. Also, because the Project Site is a large area of ignition resistant, urbanized landscapes, it is not anticipated that the entire community would be relocated off-site during a wildfire event in the nearest wildland areas that are substantial distances to the north and west of the Project and separated by railroad corridor, roadway, development and landscapes. As such, the Project would not impact or substantially impair an adopted emergency response plan or emergency evacuation plan. In particular, the Project would not block or re-route existing roadways/evacuation routes or propose actions or approaches that are conflicting with City emergency operations or response plans. Furthermore, there were no adopted evacuation plans discovered for this area, and therefore no conflicts were noted. Like any new, large community or urbanized area, the Project would provide numerous opportunities throughout the Project Site for on-site relocation and sheltering in place as a contingency option to evacuation off-site.

Based on the above, Project operations would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

(2) Mitigation Measures

Impacts related to substantially impairing an adopted emergency response plan or emergency evacuation plan during Project construction and operation would be less than significant. Therefore, no mitigation measures are required**.**

(3) Level of Significance After Mitigation

Based on the above, construction and operation of the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Threshold (b): Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

(1) Impact Analysis

(a) Construction

While Project construction activities would include the on-site use and storage of combustible materials such a fuels, oils, paints, would, etc., these materials would be used and stored in accordance with applicable regulations and manufacturer specifications to avoid ignition resulting in a fire. As part of the Project, standard construction safety features and protocols would also be implemented. These would include standard requirements for prevention, control, and extinguishment of fires during construction, including those related to smoking, storage and parking areas, use of gasoline-powered tools, use of spark arresters on construction equipment, road closures, and fire suppression equipment. Furthermore, prior to bringing lumber or other combustible building materials/substances onto the Project Site, utilities and operable fire hydrants, and roadways to the access the Project Site would already be in place. **Thus, Project construction would not exacerbate wildfire risks which could expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.**

(b) Operation

The Project would be required to comply with the 2023 Los Angeles Building Code. As discussed above, specific provisions related to wildfire include Chapter 7A, which establishes the minimum standards for the protection of life and property by increasing the ability of a building to resist the intrusion of flames or burning embers from a vegetation fire and addresses materials and construction methods for reducing exterior wildfire exposure. These measures work to limit the interaction of combustible building materials in a structure

with potential wildfire exposure by requiring features such as non-combustible siding, ember resistant vents, and dual pane tempered windows. In addition, the Project would be required to comply with the 2023 Los Angeles Fire Code. In particular, internal circulation /driveways would be required to comply with Chapter 5 and Appendix D, and the wildfire specific requirements found in Chapter 49 would also apply.

Furthermore, as discussed above, the VHFHSZ designation also carries certain requirements regarding construction methods and materials of the building, landscaping, requirements that affect vegetation on or around the building, and site access. With regard to ignition resistant requirements, the construction requirements for a podium mid-rise structure and high-rise such as those proposed by the Project would require Type 1 or 2 construction, which would naturally comply with the ignition resistant construction requirements of Chapter 7A of the LABC, as little to no wood is used in construction. In addition, as part of these requirements, mesh or other ember resistant vents would be provided to prevent intrusion into void spaces within the buildings.

With regard to landscaping, properties built within areas designated as VHFHSZ are required to comply with Chapter 49 of the CFC discussed above, including providing up to 200-foot FMZs, possibly providing a Fuel Modification Plan that LAFD may require to identify where FMZs exist and the requirements therein and to document initial landscape plan conformance, and possibly providing a Fire Protection Plan that LAFD may require to memorialize all fire requirements, the Project's conformance, and the wildland fire environment. The 200-foot requirement for the Project is identified in Figure 5 of the Wildfire Evaluation. As shown therein, for the South Parcel, the 200-foot zone includes adjacent paved areas such as roadways, the Metro A-Line tracks, the Los Angeles State Historic Park, and various structures. These areas have much less vegetation than what could be allowed, and the South Parcel is expected to be approved as the surrounding land uses exceed the FMZ requirements. For the North Parcel, the 200-foot zone also includes adjacent paved areas such as roadways, the Metro A-Line tracks, and various structures but also includes portions of the Buena Vista Hill Elysian Park and the Los Angeles State Historic Park to the south. Given that the majority of the adjacent land uses exceed the FMZ requirements, and the parks are subject to regular maintenance enforced by the City, the FMZs for the North Parcel are also likely to be approved.

Furthermore, any Project landscaping would comply with the FMZ requirements and would be irrigated. (The Fire Code does makes exceptions for ornamental shrubs and trees so long as they are well maintained and irrigated). Further, the Project Design Feature WI-PDF-1 requires the area 0–5 feet from a structure to be ember resistant consistent with the following:: use hardscape including but not limited to gravel, pavers, or concrete; no combustible bark or mulch shall be used permitted within the 0–5 feet from a structure; remove all dead and dying plants, weeds, and debris (leaves, needles, etc.) from the roof, gutter, deck, porch, stairways, and under any areas of the structure; and be maintained twice

annually, in early summer after the growing season and fall to eliminate regrowth; and limited landscape plantings shall be irrigated and low-growing properly spaced fire-resistant herbaceous (non-woody) plants.

Properties built within areas designated as VHFHSZs are also required to provide two points of access into each parcel community. The Project would comply with and exceed this requirement. Specifically, as shown on Figure II-15 of Section II, Project Description, of this Draft EIR, vehicular access to the Project would be provided by one driveway on the South Parcel from North Broadway, three driveways on the North Parcel from North Broadway, and one driveway on the South Parcel from North Spring Street located beneath the elevated Metro A Line tracks. For the South Parcel, Building 1 and the Mandarin Plaza would be bisected by an internal Project vehicular circulation driveway to access the parking garage with ingress and egress located on North Broadway and North Spring Street.

Specific to water supply, the Project would comply with Section 507 of LAFC. Water service for the Project would be provided by Los Angeles Department of Water and Power. Water storage and hydrant locations, mains, and water pressures would fully comply with 2022 LAFC and all structures would be required to have fire sprinklers designed in accordance with NFPA 13. Per the 2024 Water and Sewer Infrastructure Report included as Appendix M.1 of this Draft EIR, water storage and hydrant locations, mains, and water pressures would comply with the requirements listed in Section 507.3 of the LAFC. In addition, the Information of Fire Flow Availability (IFFA) prepared by LADWP verified that the fire hydrants would have sufficient capacity to provide adequate fire flows to the proposed Project Site. The required fire-flow for this Project, set by the LAFD, is 9,000 gpm from four to six fire hydrants flowing simultaneously. The hydrants were analyzed with flows of 1,500 gpm each, resulting in residual pressures of 28–108 psi.[16] Thus, the existing watermains and hydrants surrounding the Project would adequately service the minimum 9,000 gpm from six (6) hydrants running simultaneously. The IFFA confirms that the hydrants do meet the minimum required flow and that no new public hydrants will need to be installed.

As discussed above, the wildfire environment in the area was observed to be minimal and largely concentrated in the Elysian Park. Separation from the Project to these wildland fuels is significant and removes the potential for direct exposure. Specifically, the design of the Project including the complete fuel break offered by North Broadway would prevent a potential fire in the open space to the north within Elysian Park from directly impacting the proposed structures. It is likely that the flames within the maintained park grasses and limbed up trees would contribute to up to 40–50-foot flames under extreme worst case Santa Ana Conditions. The width of North Broadway would separate the Project structures from these flames, though the Project structures could be subjected to convective/radiant heat from a

[16] *See Appendix B of the Water and Sewer Report for the results of the Information of Fire Flow Availability Request (IFFAR) included as Appendix M.1 of this Draft EIR.*

fire in the area. However, the last fire recorded in the area was more than four decades previous, and it is unlikely that a fire will start in or burn through the well-maintained park. Further, given the lack of fire in the area since 1981, it is likely that development of the area has led to faster detection and suppression of fires. Continued development is likely to continue to reduce the probability of the Project being exposed to fire by eliminating available fuel and/or creating more access for Fire suppression crews. Nonetheless, as summarized above and discussed in detail in the Wildfire Evaluation, the Project would comply with all applicable requirements related to fire protection and the control of wildfire. Specifically, the Project provides ignition resistant buildings, landscapes, and is surrounded by fuel modification equivalent ground covers which eliminate wildfire occurrence in all directions for distances well beyond the standard 200 feet requirement. In addition, the Project does not include characteristics consistent with those that would be more likely to result in wildfire exposure, loss, injury or death from wildfire. Rather, the Project Site is located in an urban area with large fire breaks or fire break equivalents on all sides and the Project Site would not be vulnerable to ember ignitions as a result of compliance with Chapter 7A of the LABC and meeting/exceeding FMZ requirements. The same features that prevent an off-site fire from progressing to the Project and endangering Project occupants also prevent a potential Project-related fire from spreading off-site by eliminating the chain of fuels otherwise known as a fire pathway. While the Project location is in an area identified to have a hazard by CalFire, the Project area does not have a wildfire risk substantiated by increased risk of ignition or evacuation impact. Further, the same features that prevent an off-site fire from progressing to the Project and endangering Project occupants also prevent a potential fire from spreading off-site by eliminating the chain of fuels otherwise known as a fire pathway. As such, the Project would not exacerbate off-site wildfire risk.

With regard to pollutant concentrations from wildfires, it is possible that a wildfire occurring in Elysian Park when winds are blowing toward the Project could result in short-term smokey conditions. However, the type of buildings proposed would enable residents to remain indoors and not subject to smoke. If residents were compelled to leave the area, a short drive would result in removal from the smokey conditions. Further, the small area of fuel available for wildfire in the Park's open space would result in a short duration before the fuels were consumed and smoke levels subsided.

Based on the analysis above, Project operation would not exacerbate wildfire risks which could expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.

(2) Mitigation Measures

Impacts related to exacerbating wildfire risks during Project construction and operation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts related to exacerbating wildfire during Project construction and operation 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.

Threshold (c): Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

(1) Impact Analysis

The Project would require minor off-site improvements that would generally be contained in the adjacent rights-of-way to the Project Site, including along North Broadway, Bishops Road, and Solano Avenue. Off-site improvements would include sidewalk dedications and improvements, planting of street trees, roadway circulation improvements, installation of streetlights, and removal and installation of various connections to underground utility infrastructure, and installation of a signalized crosswalk adjacent to the North Parcel to provide connectivity to Elysian Park. However, travel lanes would be maintained on all streets surrounding the Project Site throughout the construction period and emergency access would not be impeded. In addition, as part of the Construction Traffic Management Plan included as Project Design Feature TR-PDF-1, construction-related deliveries and haul trips would be scheduled to occur outside the commuter peak hours to the extent feasible, thereby reducing the effect on traffic flow on surrounding streets. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained. Importantly, the Project would convert an area that currently represents a wildfire risk to a fire hardened site with irrigated landscapes, maintenance, pavement and concrete and ignition resistant buildings. The result of this conversion of ignitable fuels to ignition resistant land uses is a net decrease in potential ignitions and virtual elimination of vegetation related fires. **Therefore, potential wildfire impacts associated with the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) would be less than significant.**

(2) Mitigation Measures

Wildfire impacts related to installation or maintenance of associated infrastructure would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Wildfire impacts related to installation or maintenance of associated infrastructure would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (d): Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

(1) Impact Analysis

The Project Site is generally flat, with sloped areas that face towards the Metro A Line tracks and the Los Angeles State Historic Park to the south. Based on the Project's location and surrounding terrain, and distance from the nearest steeper slope areas, there is virtually no potential exposure of the Project to significant risks from flooding, landslides, runoff, or post-fire slope instability or drainage changes. In addition, as discussed in Section IV.H, Hydrology and Water Quality, of this Draft EIR, the Project would result in improved drainage within the Project vicinity through compliance with the City's Low Impact Development (LID) requirements, which include implementation of Best Management Practices (BMPs) to control and filter stormwater runoff.[17] These BMPs are not currently located within the Project Site. **Therefore, impacts associated with the potential for the Project to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be less than significant**.

(2) Mitigation Measures

Impacts regarding exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes would be less than significant without mitigation. Therefore, no mitigation measures are required.

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[17] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Watershed Protection Division, Planning and Land Development for LID, Part B: Planning Activities, 5th Edition, May 2016.*

(3) Level of Significance After Mitigation

Impacts regarding exposing people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire /slope instability, or drainage changes would 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

As indicated in Chapter III, Environmental Setting, of this Draft EIR, there are 25 related projects within the vicinity of the Project Site.

With regard to impairment of an adopted emergency response plan or emergency evacuation plan, like the Project, the related projects would be required to provide adequate emergency access in accordance with applicable Fire Code and Building Code requirements. In particular, like the Project, a path of free and clear access for emergency vehicles would be provided, and driveways and any internal roadways would be of widths that comply with regulatory requirements. **As such, cumulative impacts from the Project and related projects associated with impairment of adopted emergency evacuation/response plan impacts would be less than significant**.

With regard to cumulative impacts related to wildfire risks due to slope, prevailing winds, and other factors, like the Project, each related project would be required to adhere to applicable Fire Code and Building Code requirements (including the provision of code-required FMZs where applicable for related projects located within a VHFHSZ) to reduce potential wildfire risk and exposure of occupants to pollutant concentrations from a wildfire. As concluded in the discussion of Project-level impacts under Threshold (b) above, the Project with implementation of Fire Code and Building Code requirements, which include consideration of FMZs, the Project would have a less-than-significant impact related to exposure of Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **As such, cumulative impacts from the Project and related projects associated with the exacerbation of wildfire risk impacts would be less than significant.**

Related projects may require associated infrastructure, such as roads, fuel breaks, and power lines that could exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. These projects would be reviewed by their respective jurisdictions for land use and zoning consistency and compliance with applicable design requirements. The placement of infrastructure would occur in conformance with applicable

fire codes to minimize the potential fire risk such as siting and design. As concluded in the discussion of Project-level impacts under Threshold (c) above, the installation of associated infrastructure specific to the conditions of the Project Site would not exacerbate wildfire risk. **As such, potential cumulative impacts from the Project and related projects associated with exacerbation of fire risk impacts due to the development of required infrastructure would be less than significant.**

Related projects would also be required to adhere to their respective zoning and land use designations and codes, State and City fire codes, and regulations associated with drainage and site stability. These regulations, policies, and codes would reduce the potential for exposing people or structures to risks from downslope or downstream flooding or landslides as a result of post-fire instability. As concluded in the discussion of Project-level impacts under Threshold (d) above, the Project would not expose people or structures to significant risks due to post-fire slope instability or drainage changes with adherence to applicable regulations. **As such, cumulative impacts from the Project and related projects associated with exposure of people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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