IV. Environmental Impact Analysis
L.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning dated March 1, 2022, which is included in Appendix J.1 of this Draft EIR; and the Water and Sewer Infrastructure Assessment Report (Water and Sewer Report), prepared by Fuscoe Engineering (December 16, 2024), which is included in Appendix M.1 of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency 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 2023–2026

(1) Federal

(a) Occupational Safety and Health Administration

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

(b) Federal Emergency Management Agency

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 Indian 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 (CBC), 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). CBC 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 2022 edition of the CBC became effective on January 1, 2023.[1] The building standards in the CBC 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.[2]

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

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (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).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, 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.[4]

(c) California Vehicle Code

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

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light*

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1 *CBC (CCR, Title 24, Part 2).*

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

3 *Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised February 1, 2023.*

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

5 *A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.*

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: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–93 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833 (Hayward Ruling), the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services."

(e) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (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 the 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). Cal OES 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.L.1-1 on page IV.L.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 service, emergency medical service, and infrastructure.[6] 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

[6] *City of Los Angeles, General Plan Framework Element, Chapter 9: Infrastructure and Public Services.*

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

Goal/ Objective/ Policy	Description
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	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.

Source: City of Los Angeles, General Plan Framework Element, 2001.

neighborhood land uses is 1.5 miles.[7] This is consistent with the specifications for response distances within the LAMC.

(c) City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 24, 2021, 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

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

capabilities, as shown in Table IV.L.1-2 on page IV.L.1-9. In addition, the City's Safety Element designates disaster routes.

(d) Central City 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.

The Project Site is located within the Central City North Community Plan (Community Plan)[8] area. The Central City North Community Plan, adopted on December 15, 2000, and amended on September 7, 2016, includes the following policies that are relevant to fire protection:

- Objective 9-1: Ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City North.
- Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine impact on service demands.
- Policy 9-1.2: Encourage the Fire Department to locate fire services facilities in appropriate locations throughout the community in order to maintain safety.

[8] *The City of Los Angeles Department of City Planning has been processing an update to the Central City North Community Plan and the Central City Community Plan, whose areas together make up Downtown Los Angeles (sometimes known as DTLA), in a combined planning process referred to as the DTLA 2040 Plan. On May 3, 2023, the Los Angeles City Council voted unanimously to approve the DTLA 2040 Plan. Following City Council approval, the implementing ordinances are now being reviewed and finalized by the City Attorney for form and legality. After the City Attorney has completed their review for form and legality, the DTLA 2040 Plan implementing ordinances will be presented to the City Council PLUM Committee and City Council for adoption.*

Table IV.L.1-2
Relevant General Plan Safety Element Goals, Objectives, and Policies

Goal/ Objective/ Policy	Description
Policy 1.1.3	Facility/Systems Location and Maintenance. Locate new critical facilities and infrastructure outside of hazard areas, especially VHFHSZs, when feasible. If no feasible alternative site exists, ensure that these facilities incorporate all necessary protections to allow them to continue to serve essential community needs during and after disaster events. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions and the growing climate emergency.
Policy 1.1.6	State and Federal Regulations. Assure compliance with applicable State and federal planning and development regulations. Regularly adopt new provisions of the California Building Standards Code, Title 24, and California Fire Code into the LAMC to ensure that new development meets or exceeds Statewide minimums. Ensure new development in VHFHSZs adheres to the California Building Code, the California Fire Code, Los Angeles Fire Code and California Public Resources Code. Facilitate compliance with new standards for existing non-conforming structures and evacuation routes.
Policy 1.1.8	Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as VHFHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.
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. Participate in regularly scheduled disaster exercises to better prepare Police, Fire, Public Works and other City employees with disaster responsibilities.
Policy 2.1.6	Standards/Fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression and safety. • Enforce peak water supply/fire flow requirements and ensure that new development is able to sufficiently source water, including in VHFHSZs. • Enforce minimum roadway widths and clearances for evacuation and fire suppression. • Maintain special fire-fighting units at the Port of Los Angeles, Los Angeles International Airport, and Van Nuys Municipal Airport capable of responding to special emergencies unique to the operations of those facilities. • Coordinate with CALFIRE, local fire agencies, fire safe councils, private landowners, and other responsible agencies to identify the best method(s) of fuel modification to reduce the severity of future wildfires, including: Prescribed fire; Forest thinning; Grazing; Mechanical clearing; Hand clearing (piling, burning/chipping); Education; and Defensible space. • 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.

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

Goal/ Objective/ Policy	Description
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination. Coordinate between city departments, county and state agencies, local jurisdictions and with appropriate private and public entities prior to a disaster 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.

Source: City of Los Angeles, General Plan Safety Element, 2021.

(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 City of Los Angeles Department of Building and Safety (LADBS): 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 LADBS 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 to 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 or elevators must be interconnected with the standby power.

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

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, and 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 the water

system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

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

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

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

(f) Propositions F and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations 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.[9] Also, as reported in November 2019, the City's Department of Public Works, 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.[10] 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

[9] *Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb–March 2016.*

[10] *City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.*

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.[11]

(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 2 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 2 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 2 acres.

(h) Los Angeles Fire Department Strategic Plan 2023–2026

The Los Angeles Fire Department Strategic Plan 2023–2026 is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2023-2026 builds upon the progress of the previous Strategic Plan from 2018–2020. As provided in the Strategic Plan 2023–2026, seven goals will guide the LAFD for the next three years: (1) deliver exceptional public safety and emergency services; (2) promote a safe, healthy, and progressive work environment that effectively manages personal and organizational risk; (3) commit to an organization that embraces diversity, equity, and inclusion; (4) improve collaboration, participative leadership, and responsible performance management; (5) foster personal, 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.

b. Existing Conditions

(1) Fire Protection Facilities, Services, and Response Times

The LAFD serves as the City's life safety agency with approximately 3,510 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community

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

services.[12] There are 106 neighborhood fire stations strategically located across the LAFD's approximately 469-square-mile jurisdiction.[13] At any given time, a total of 1,018 firefighters, are on 24-hour duty. In addition, the LAFD is supported by 392 technical and administrative personnel.[14]

As shown in Figure IV.L.1-1 on page IV.L.1-15, LAFD Fire Station Nos. 4, 1, 3, 9, and 2 provide initial response to the Project Site.[15] These fire stations are located between 1.1 miles to 2.1 miles from the Project Site.[16] The closest "first-in" fire station is Fire Station No. 4, which is located at 450 E. Temple Street, approximately 1.1 miles south of the Project Site. As shown in Table IV.L.1-3 on page IV.L.1-16, Fire Station No. 4 consists of an assessment engine, paramedic rescue ambulance, EMS battalion captain, battalion chief, basic life support (BLS) rescue ambulance, and a staff of 11.[17] Fire Station No. 1 is located at 2230 N. Pasadena Avenue, approximately 1.3 miles northeast of the Project Site. This station consists of an assessment engine, light force, paramedic rescue ambulance, a BLS Rescue Ambulance, and a staff of 14.[18] Fire Station No. 3 is located at 108 N. Fremont Avenue, approximately 1.5 miles southwest of the Project Site. This station consists of a task force, paramedic rescue ambulance, BLS rescue ambulance, emergency lighting unit, command post vehicle, medical supply trailer and backup US&R apparatus, and a staff of 18.[19] Fire Station No. 9 is located at 430 E. 7th Street, approximately 2.1 miles southwest of the Project Site. This station consists of two assessment engines, a BLS truck and two paramedic rescue ambulance, a BLS rescue ambulance, and a staff of 19.[20] Fire Station No. 2 is located at 1962 E. Chavez Avenue, approximately 2.1 miles southeast of the Project Site. This station consists of a light force, engine, paramedic ambulance, and a staff of 12.[21]

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[12] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed May 5, 2025.*

[13] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed May 5, 2025.*

[14] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed May 5, 2025.*

[15] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

[16] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

[17] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

[18] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

[19] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

[20] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

[21] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

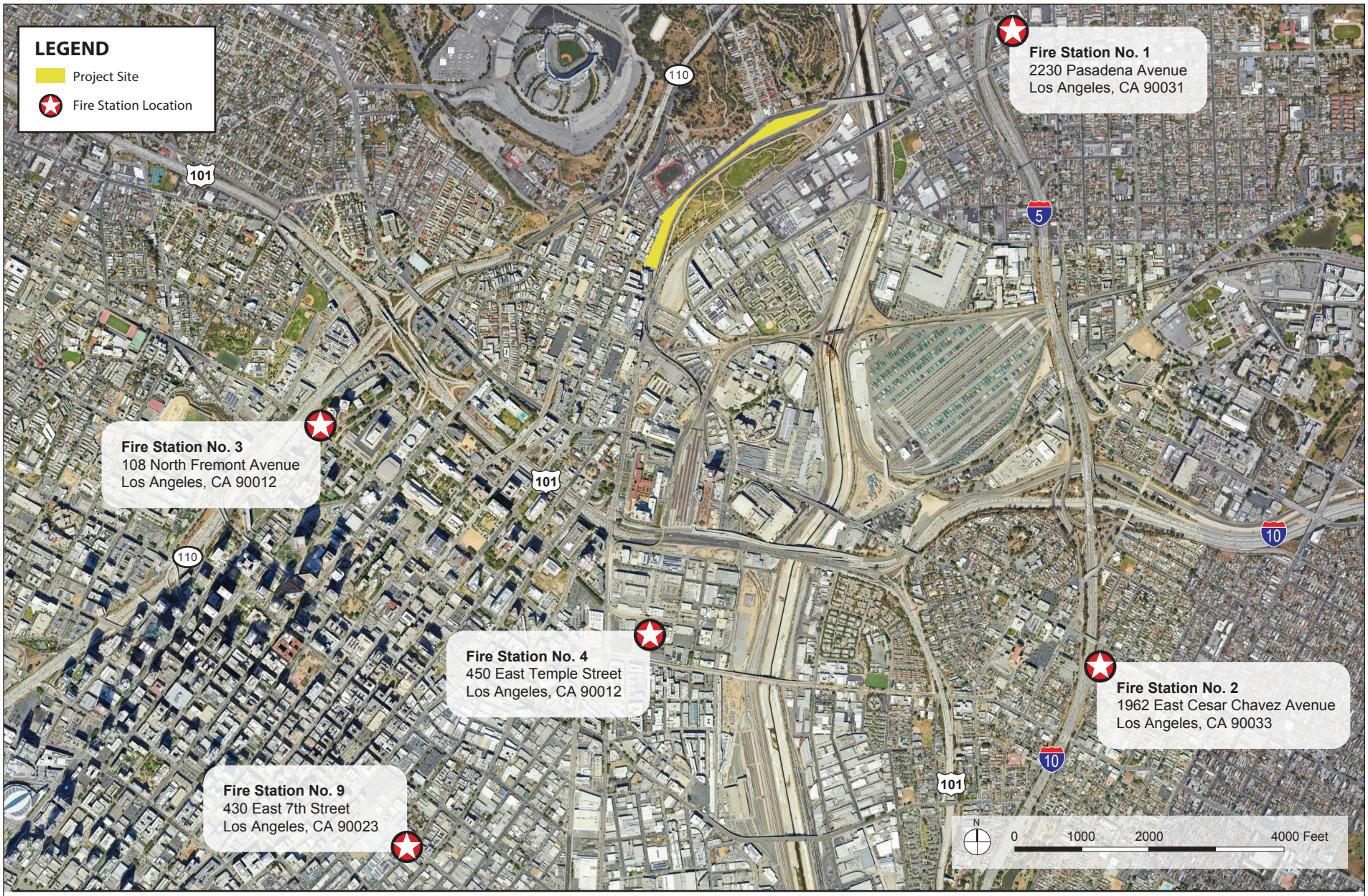

Figure IV.L.1-1
Fire Stations Serving the Project Site

Source: Google Earth Pro, 2024; Eyestone Environmental, 2024.

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

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 4 450 E. Temple St. Los Angeles, CA 90012	1.1 mile	• Assessment Engine • Paramedic Rescue Ambulance • EMS Battalion Captain • EMS Battalion Chief • BLS Rescue Ambulance	• 11 staff
Fire Station No. 1 2230 N. Pasadena Ave. Los Angeles, CA 90031	1.3 mile	• Assessment Engine • Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance	• 14 staff
Fire Station No. 3 108 N. Fremont Ave. Los Angeles, CA 90012	1.5 mile	• Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Emergency Lighting Unit • Command Post Vehicle • Medical Supply Trailer • Back-Up US&R Apparatus	• 18 staff
Fire Station No. 9 430 E 7th St. Los Angeles, CA 90014	2.1 miles	• 2 Assessment Engines • BLS Truck • 2 Paramedic Rescue Ambulances • BLS Rescue Ambulance	• 19 staff
Fire Station No. 2 1962 East Cesar Chavez Avenue Los Angeles, CA 90033	2.1 miles	• Light Force • Engine • Paramedic Rescue Ambulance	• 12 staff

BLS = basic life support

EMS = emergency medical services

Source: Interdepartmental Correspondence from Kristin Crowley, Fire Marshall, March 1, 2022 (refer to Appendix J.1 of this Draft EIR).

The response times of the fire stations serving the Project Site from January 2025 to March 2025 are shown in Table IV.L.1-4 on page IV.L.1-17. LAFD has not established response times standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response.

The LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in

Table IV.L.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 Incident (Minutes:Seconds)
Fire Station No. 4	5:51	5:46
Fire Station No. 1	6:03	6:24
Fire Station No. 3	5:35	4:45
Fire Station No. 9	5:09	4:54
Fire Station No. 5	6:17	6:03

[a] *Response times are based on January 2024–March 2024 data.*

Source: LAFD, FireStatLA, Station 4 Response Metrics for January–March 2025, https://lafd.org/fsla/stations-map?station=4&year=2025, accessed May 5, 2025; FireStatLA, Station 1 Response Metrics for January–March 2025, https://lafd.org/fsla/stations-map?station=1&year=2025, accessed May 5, 2025; FireStatLA, Station 3 Response Metrics for January–March 2025, https://lafd.org/fsla/stations-map?station=3&year=2025, accessed May 5, 2025; FireStatLA, Station 9 Response Metrics for January–March 2025, https://lafd.org/fsla/stations-map?station=9&year=2025, accessed May 5, 2025; FireStatLA, Station 5 Response Metrics for January–March 2025, https://lafd.org/fsla/stations-map?station=5&year=2025, accessed May 5, 2025.

emergency response.[22] The City has over 205 miles of major arterial routes that are equipped with FPS.[23]

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for fire protection and emergency services needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the Hayward Ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

[22] *LADOT, Los Angeles Signal Synchronization Fact Sheet.*

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

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the South Parcel is largely paved and partially developed with structures associated with former Metro operations and maintenance-related facilities and the North Parcel includes foundation remnants and graded areas, and is generally used for construction staging and bus parking. Existing vehicular access, including emergency access, to the South Parcel is provided 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. Vehicular and emergency 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 City's Safety Element specifies that primary evacuation routes consist of the major interstates, highways, and primary arterials within the City and Los Angeles County as outlined in the City's Emergency Operations Plan, Evacuations Functional Support Index.[24] Specific evacuation routes are not identified by name in the City's Emergency Operations Plan, Evacuations Functional Support Index, however based on the criteria noted above, the nearest evacuation routes to the Project Site include State Route 110, located approximately 700 feet to the northwest of the Project Site, Interstate 5 located approximately 0.4 mile northeast of the Project Site, and the following arterial routes: North Broadway, adjacent to the Project Site to the north, and Main Street, located approximately 0.2 mile south of the Project Site.

(3) Fire Flow and Hydrants

In addition to providing domestic water service to the Project Site, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). As discussed in the Water and Sewer Report prepared by Fuscoe Engineering (December 16, 2024), included as Appendix M.1 of this Draft EIR, water service is currently provided to the Project Site via LADWP water lines within adjacent streets. Specifically, according to the Water and Sewer Report, a 24-inch water main and a 40-inch water main are located along North Broadway and a 12-inch water main is located along North Spring Street.[25] In addition, there are nine fire hydrants located within 300 feet of the Project Site boundary along the north side of North Broadway. The hydrants are served by water lines in North Broadway.

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[24] *City of Los Angeles, Emergency Operations Plan, Evacuation Functional Support Annex, October 2020.*

[25] *Water and Sewer Infrastructure Assessment Report prepared by Fuscoe Engineering dated December 16, 2024.*

(4) Fire Hazard Areas

There are no wildlands located in this urbanized portion of the City However, based on updated mapping published by CAL FIRE in March 2025, the Project Site is now mapped in High and Very High Fire Hazard Severity Zones (HFHSZ and VHFHSZ, respectively).[26] Further, much of the area to the north of the Project Site including Elysian Park and the Radio Hill Gardens is also mapped within a VHFHSZ.[27] Therefore, the potential for wildland fires at the Project Site is discussed below and is analyzed in detail in Section IV.P, Wildfire, of this Draft EIR.

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., fire), need for new or physically altered governmental facilities, the 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 *L.A. CEQA Thresholds Guide,* as appropriate to assist in answering the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factor to evaluate fire protection:

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

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[26] *CAL FIRE, Find your Fire Hazard Severity Zone (FHSZ) and local public contacts, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed April 23, 2025.*

[27] *CAL FIRE, Find your Fire Hazard Severity Zone (FHSZ) and local public contacts, https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed April 23, 2025.*

b. Methodology

Project impacts regarding fire services are evaluated on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. The evaluation of impacts considers whether or not the development of a project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effect on fire protection services.

The need for or deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact but rather a social and/or economic impact. Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this Draft EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection and emergency medical services from a project is determined by whether construction of new or expanded fire protection and emergency medical facilities is a reasonably foreseeable direct or indirect effect of the project. There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire and emergency facilities, that in the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration.

c. Project Design Features

No specific Project Design Features are proposed with regard to fire protection. However, as discussed in Section IV.M, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1 the Project would implement a Construction Traffic Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 CFR, Part 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, Project construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[28] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to Project construction would be maintained on site.[29] Project construction would also comply with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction activities also have the potential to affect fire protection services by necessitating partial lane closures for installation of required utility and street improvements.

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[28] *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 January 22, 2025.*

[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 January 22, 2025.*

In particular, lane closures may occur along Broadway from Bernard Street to Elysian Park Drive, adjacent to the Project Site. However, a travel lane would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded.

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. However, with implementation of Project Design Feature TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts.[30] The Project would also employ temporary traffic controls such as flag persons to manage 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, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow on adjacent rights-of-way are maintained. 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 would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain adequate fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.

(b) Operation

(i) Facilities and Equipment

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes a mixed-use development consisting of 986 residential units including 200 affordable units; 15,000 square feet of retail uses; and 23,800 square feet of restaurant uses. As discussed in Section IV.K, Population and Housing of this Draft EIR, based on rates from the City's VMT Calculator Documentation, the Project's 986 residential units would generate a residential population of approximately 2,399 persons at full buildout and the Project's commercial components would generate approximately 146 employees. Therefore, the Project would introduce a new residential and employee population to the Project

[30] *As set forth in the Interdepartmental Correspondence from the Bureau of Street Services to the Department of City Planning dated March 20, 2024 regarding hauling for the Project., hauling operations would be restricted to the hours between 9:00 A.M. and 3:00 P.M. during weekdays, and 8:00 AM and 4:00 P.M. on Saturdays. No hauling would be performed on Sundays and Holidays.*

Site that would increase the demand for LAFD fire protection services, which could, in turn, result in a need for new or physically altered government facilities. As set forth in the Interdepartmental Correspondence with LAFD, Fire Station Nos. 4, 1, 3, 9, and 2 would provide initial response to the Project Site. As summarized in Table IV.L.1-3 on page IV.L.1-16, these fire stations are located between 1.1 and 2.1 miles from the Project Site. LAFD has concluded that based on the responses distance of the Project Site to existing fire stations, fire protection would be adequate.[31]

As described above, there are no wildlands located in this urbanized portion of the City. However, based on updated mapping published by CAL FIRE in March 2025, the Project Site is now mapped in a HFHZ and a VSFHZ. Further, much of the area to the north of the Project Site, including Elysian Park, the Radio Hill Gardens and Los Angeles State Historic Park, is also mapped within a VSFHZ. As mentioned above the Project's development would increase the demand for LAFD fire protection services when compared to existing conditions. The proposed uses would be expected to generate a range of fire service calls similar to other residential and commercial 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, as discussed in detail in Section IV.P, Wildfire, of this Draft EIR in accordance with LAFD and Code requirements, the Project would implement various features including but not limited to ignition resistant building materials, ember resistant vents, and a fuel modification zone with irrigated landscaping. In addition, the Project would exceed the requirement to provide two points of access and adequate fire flows would be provided to the Project Site. As such, the Project would not exacerbate wildfire risks that would increase the demand for fire protection services or need for new or physically altered governmental facilities.

Pursuant to LAMC Section 57.4705.4, the Project would be required to provide an emergency helicopter landing facility, as described above in Subsection 2.a.(3)(e), or to implement one of two alternate options to the emergency helicopter landing facility with approval of the Fire Marshal. In particular, a proposed development could include: (1) provision of a helicopter tactical landing area; or (2) additional life safety elements, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways. The Project intends to implement the additional life safety elements set forth in the second option. The Project would also implement all applicable Los Angeles Building and Fire Code requirements regarding structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of

[31] *Los Angeles Fire Department, Written correspondence from Kristin M. Crowley, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, March 1, 2022.*

hazardous materials, alarm and communication systems, and building sprinkler systems. Compliance with applicable City Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118 prior to the issuance of a building permit.

Overall, compliance with applicable regulatory requirements, including installation of automatic fire sprinkler systems and 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 Central City North Community Plan, as listed in Subsection 2.a, above, the City and LAFD would continue to monitor the overall demand for existing and projected fire facilities (Objective 9.16 in the Framework Element and Policy 2.1.6 in the Safety Element) and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 in the Framework Element).[32] 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. As discussed above in Section 2.b(1), consistent with the Hayward Ruling, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. The City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services.

(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 by one driveway on the South Parcel from North Broadway, one driveway on the South Parcel from North Spring Street, and three driveways on the North Parcel from North Broadway. The primary emergency access driveway would align with North Broadway and Solano Avenue and would be integrated into the existing traffic signal as the proposed east leg of the intersection. Access to a fire lane within the North Parcel would also be provided on North Broadway adjacent to an unsignalized driveway at Cottage Home Street. This driveway would only be accessible for emergency vehicles. 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. In particular, the Project exceeds the requirement to provide two points of access for properties located within

[32] *Refer to Framework Element Objectives 9.16 and 9.18, Safety Element Policy 2.1.6, and Fire Protection Objective 9.1 of the Central City North Community Plan.*

VHFHSZs. 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.

Additionally, operation of the Project would not include the installation of any barriers (e.g., fixed bollards, etc.) that could impede emergency vehicle access within the vicinity of the Project Site. 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, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. 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 and the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes.

In addition, with regard to emergency access associated with wildfires, as discussed in detail in Section IV.P, Wildfire, of this Draft EIR, safe evacuation of the Project and surrounding community would be expected. Also, because the Project Site is a large area of ignition resistant, urbanized landscapes, it is not anticipated that the entire community would need to be relocated off-site during a wildfire event in the nearest wildland areas, as they are located substantial distances to the north and west of the Project Site and are separated by a railroad corridor, roadway, multiple developments and maintained and irrigated landscaped areas. As such, the Project would not impact or substantially impair an adopted emergency response plan or emergency evacuation plan in the event of a wildfire. Refer to Section IV.P, Wildfire for a more detailed discussion of emergency access and evacuation during a wildfire.

(iii) Fire Flow

As discussed in the Water and Sewer Report included as Appendix M.1 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 J.1 of this Draft EIR, the

required fire water flow for the Project has been set at 9,000 gpm from four to six hydrants flowing simultaneously with a minimum residual water pressure of 20 psi.

As discussed in the Water and Sewer Report, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system would have adequate water pressure to serve the Project's anticipated fire and domestic water needs. Based on the completed IFFAR, there are six nearby hydrants flowing simultaneously for a combined 9,000 gpm. Therefore, as shown by the IFFAR, the Project would have adequate fire flow available to demonstrate compliance with LAMC Section 57.507.3. As discussed in more detail in the Water and Sewer Report, due to the loss in water pressure resulting from the multi-leveled structures, a booster pump system would be required to provide the minimum flow and pressures to the buildings. The IFFAR confirms that the hydrants do meet the minimum required flow and that no new public hydrants will need to be installed.

In addition, the Project would incorporate fire sprinkler suppression system in all the proposed buildings. It should be noted that the proposed ancillary parking structures will be fully sprinklered and thus new hydrants are not proposed in the immediate vicinity of these structures. Per LAMC 94.2020.0, which adopts by reference NFPA 14-2013, including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. Because the Service Advisory Request submitted to LADWP confirms there is sufficient pressure to serve the Project, adequate water pressure is available to operate the proposed fire sprinkler suppression system. Furthermore, the incorporation of the proposed fire sprinkler suppression system in all the proposed buildings would allow for a reduction or elimination of the Project's public hydrant demand. Specifically, Section B105.3 of the California Fire Code states that for buildings equipped with an approved automatic sprinkler system, the water supply shall be capable of providing the greater of the required automatic sprinkler system demand or the hydrant fire flow demand. Despite Section B105.3, the Project would meet both the fire hydrant fire flow demand and the automatic sprinkler system demand for the Project as indicated above.

(iv) Conclusion

Based on the above analysis and the requirement stated in the California Constitution Article XII, Section 35(a)(2) to provide these services, the operation of the Project would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Additionally, as concluded in the written correspondence from the LAFD included in Appendix J.1 of this Draft EIR, with the implementation of the recommendations set forth therein along with any additional recommendations that could be made during later reviews of the Project as part of the normal building permit process, potential impacts to fire protection services would be addressed. **Therefore, Project operation would not result in substantial adverse physical impacts associated with the provision of new or**

physically altered governmental facilities (i.e., fire), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to fire protection facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and impact levels would remain less than significant.

e. Project Impacts with Long-Term Buildout

While Project buildout is anticipated as early as 2034, the Applicant is seeking a Development Agreement with a term of 20 years, which could extend the full buildout year to approximately 2047. The Mitigation Monitoring Program 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. Accordingly, a later buildout date would not affect the impacts or significance conclusions presented above.

f. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection are the service areas of Fire Station Nos. 4, 1, 3, 9, and 5. The Project, in conjunction with growth forecasted in the City through 2034 (the Project's anticipated buildout year), would cumulatively generate a demand for fire protection service. Cumulative growth in the greater

Project area through 2034 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 25 related projects located in the vicinity of the Project Site.

(a) Construction

As with the Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, similar to the Project, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Similar to the Project, each related project would be subject to the City's routine construction permitting process, which includes a review by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection services. Furthermore, as previously discussed, the drivers of fire and emergency vehicles are generally able to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Finally, as the Project would not cause a significant impact to fire protection during construction, the Project's contribution to a cumulative impact to fire protection services would not be considerable and would be considered less than significant.

(b) Operation

As stated in the written correspondence from LAFD included in Appendix J.1 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. However, as provided in their written correspondence, at present, the LAFD has no immediate plans to increase LAFD staffing or resources in the areas of the fire stations that would serve the Project and related Projects. 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 to ensure that sufficient

fire safety measures are implemented to reduce potential impacts to fire protection. Furthermore, the Project, related projects, and other future growth would be subject to the standard construction permitting process, which includes review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

The Project and related projects would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. 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 that 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.

As stated above, LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) would otherwise have their own CEQA clearance document such as a Mitigated Negative Declaration or could qualify for a categorical exemption. Therefore, development of a station at this scale and within the highly urbanized area surrounding the Project Site 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. Furthermore, if a new or expanded fire station were required to serve cumulative development: (1) the construction of an expanded or new fire station would not result in significant effects on the environment; and (2) the Project's contribution to the need for such expanded or new fire station would not be cumulatively considerable. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Lastly, consistent with the Hayward Ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1), the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City.

Based on the above, the Project's contribution to cumulative impacts to fire protection services would not be cumulatively considerable and thus would not require a new fire station, or the expansion of an existing fire station, the construction of which would cause significant environmental impacts, As such, cumulative impacts related to fire protection would be less than significant.

(2) Mitigation Measures

Cumulative impacts related to fire protection services were determined to 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.