IV. Environmental Impact Analysis

H.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website and inter-departmental correspondence from LAFD to the Department of City Planning on March 7, 2023, which is included in Appendix H of this Draft EIR. Additional technical information used in the analysis is based on the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) prepared for the Project, included in Appendix L 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:

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

2 *Los Angeles Fire Department, 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 April 2019.*

4 *Los Angeles Fire Department, 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.*

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

(d) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "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, 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.H.1-1 on page IV.H.1-7. As listed therein, 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.

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

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

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

Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.[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,

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

procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as provided in Table IV.H.1-2 on page IV.H.1-9.

(d) Central City North 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 updated 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 will be reviewed and finalized by the City Attorney to ensure clarity of regulations and consistency with state law, a process which can occur over an approximate six-month to one-year period.*

Table IV.H.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.H.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.

(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 Services and Facilities

The LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction. A total of 1,018 firefighters, including 270 paramedics, are on

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

24-hour duty. In addition, the LAFD is supported by 381 technical and administrative personnel.[12]

As shown in Figure IV.H.1-1 on page IV.H.1-15, there are three LAFD fire stations located within a 2-mile radius of the Project Site. The "first-in" station for the Project Site is Fire Station No. 9, which is located at 430 East 7th Street, approximately 0.9 mile from the Project Site.[13] As shown in Table IV.H.1-3 on page IV.H.1-16, Fire Station No. 9 consists of a truck, two assessment engines, two paramedic rescue ambulances, one Basic Life Support (BLS) Rescue Ambulance, and a staff of 19.[14] Fire Station No. 17 is located at 1601 South Santa Fe Avenue, approximately 1.3 miles southeast of the Project Site. This station is equipped with an assessment engine, a paramedic rescue ambulance, arson, and a staff of eight.[15] Fire Station No. 4 is located at 450 East Temple Street, approximately 1.4 miles north of the Project Site. This station is equipped with an assessment engine, a paramedic rescue ambulance, a BLS rescue ambulance, a battalion supervisor, an emergency medical services (EMS) battalion supervisor, and a staff of 11.[16]

As identified by the LAFD, secondary fire stations that serve the Project Site include Fire Stations Nos. 25 and 2.[17] Fire Station No. 25 is located at 2927 Whittier Boulevard, approximately 2 miles east of the Project Site. This station is equipped with an assessment engine, paramedic rescue ambulance, and a staff of six.[18] Fire Station No. 2 is located at 1962 East Cesar Chavez Avenue, approximately 2.1 miles northeast of the Project Site. This station is equipped with an assessment light force, an engine, a paramedic rescue ambulance, and a staff of 12.[19]

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12 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed April 18, 2023.*

13 *LAFD, Find Your Station, /www.lafd.org/fire-stations/station-results, accessed April 18, 2023.*

14 *Written correspondence from Kristen Crowley, Fire Chief, and Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 7, 2023.*

15 *Written correspondence from Kristen Crowley, Fire Chief, and Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 7, 2023.*

16 *Written correspondence from Kristen Crowley, Fire Chief, and Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 7, 2023.*

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19 *Written correspondence from Kristen Crowley, Fire Chief, and Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 7, 2023.*

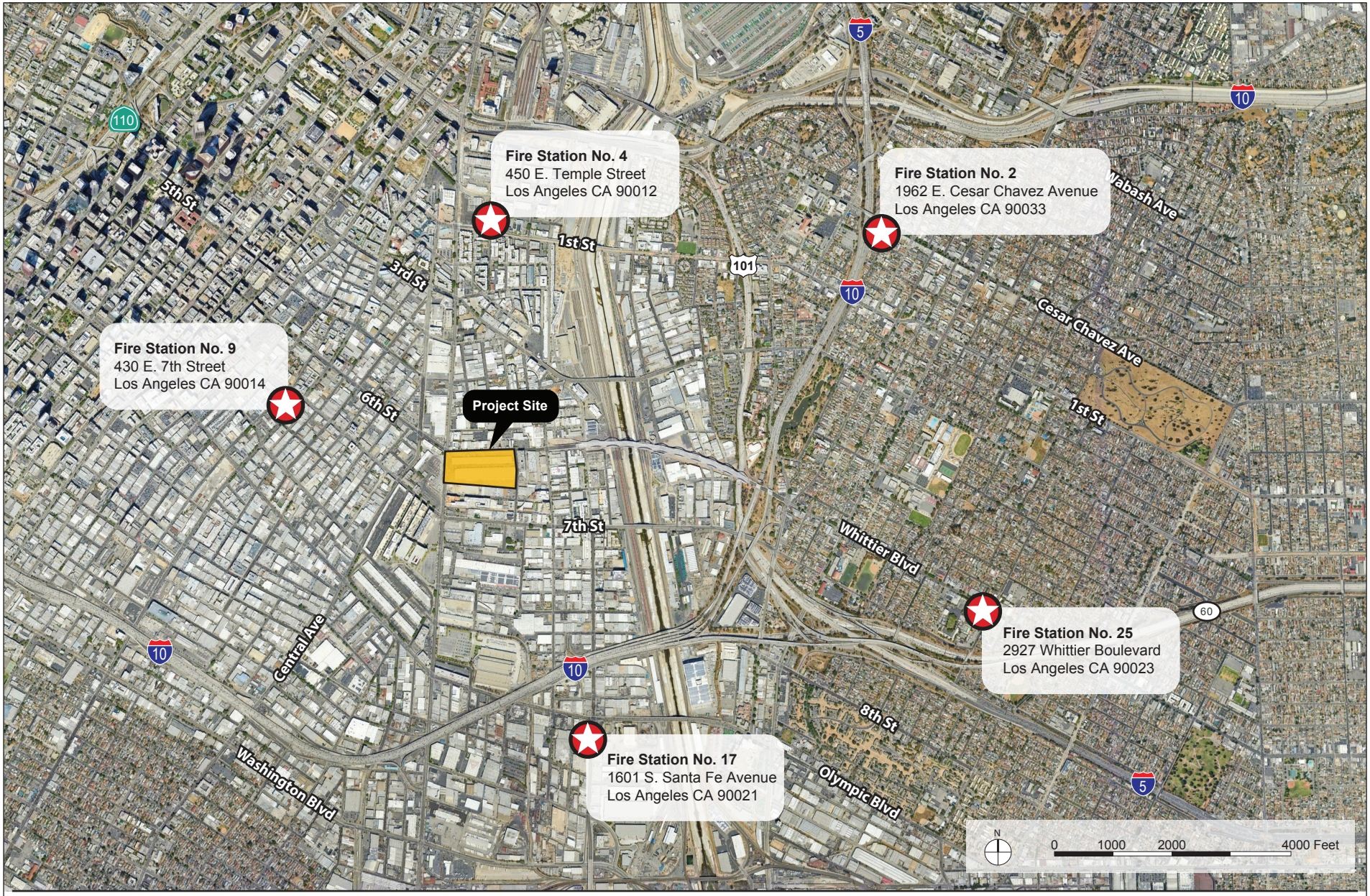

Figure IV.H.1-1
Fire Stations in the Vicinity of the Project Site

Source: Google Earth Pro, 2023; Eyestone Environmental, 2023.

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

Station No., Location, and Community Served	Distance from Project Site	Equipment/Team	Staffing
Fire Station No. 9 430 E. 7th Street Los Angeles, CA 90023	0.9 mile	• Truck • 2 Assessment Engines • 2 Paramedic Rescue Ambulances • BLS Rescue Ambulance	• 19 staff
Fire Station No. 17 1601 S. Santa Fe Ave. Los Angeles, CA 90021	1.3 miles	• Assessment Light Force • Paramedic Rescue Ambulance • Arson	• 8 staff
Fire Station No. 4 450 E. Temple St. Los Angeles, CA 90012	1.4 miles	• Assessment Engine • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Battalion Supervisor • EMS Battalion Supervisor	• 11 staff
Fire Station No. 25 2927 Whittier Blvd. Los Angeles, CA 90023	2.0 miles	• Assessment Engine • Paramedic Rescue Ambulance	• 6 staff
Fire Station No. 2 1962 E. Cesar Chavez Ave. Los Angeles, CA 90033	2.3 miles	• Assessment Light Force • Engine • Paramedic Rescue Ambulance	• 12 staff

Source: Written correspondence from Kristen Crowley, Fire Chief, and Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 7, 2023.

The response times of the nearest fire stations serving the Project Site from January 2023 to December 2023 are shown in Table IV.H.1-4 on page IV.H.1-17. However, it is noted that LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.[20]

[20] *NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2020 Edition. Response time is turnout time plus travel time for emergency medical service and fire suppression incidents.*

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

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 9	7:02	7:04
Fire Station No. 17	7:34	7:24
Fire Station No. 4	7:07	6:56
Fire Station No. 25	7:27	8:04
Fire Station No. 2	7:08	6:37

[a] *Response times are based on January 2023–December 2023 data.*

Source: LAFD: FireStatLA, Station 9 Response Metrics for January–December 2023, www.lafd.org/fsla/stations-map?station=9&year=2023, accessed April 19, 2024; FireStatLA, Station 17 Response Metrics for January–December 2023, www.lafd.org/fsla/stations-map?station=17&year=2023, accessed April 19, 2024; FireStatLA, Station 4 Response Metrics for January–December 2023, www.lafd.org/fsla/stations-map?station=4&year=2023, accessed April 19, 2024; FireStatLA, Station 25 Response Metrics for January–December 2023, www.lafd.org/fsla/stations-map?station=25&year=2023, accessed April 19, 2024; FireStatLA, Station 2 Response Metrics for January–December 2023, www.lafd.org/fsla/stations-map?station=2&year=2023, accessed April 19, 2024.

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle.

Additionally, 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 emergency response.[21] The City has over 205 miles of major arterial routes that are equipped with FPS.[22]

According to the LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area

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

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

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), 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.

With regard to studio and filming activities, LAFD's Film Unit in the Bureau of Fire Prevention and Public Safety oversees motion picture and television production studios and sound stages, approved production facilities and locations, and commercial digital media production conducted in the City.[23] Filming activities must meet the LAFD Film Unit's Studio/Sound Stage Fire & Life Safety Requirements, and certain special effects, such as pyrotechnics, require a permit.[24]

(2) Emergency Access

Vehicular access, including emergency access to the Project Site is currently provided via several access points along 6th Street, Alameda Street, Mill Street, and at Wholesale Street.

(3) Fire Water Infrastructure

As discussed in the Utility Report, included as Appendix L of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via LADWP water lines within adjacent streets. Specifically, according to the Utility Report, there is an 8-inch water main in 6th Street, a 12-inch water main in Alameda Street, and an 8-inch water main in Mill Street surrounding the Project Site. In addition, there are eight existing fire hydrants surrounding the Project Site, with four hydrants located on Alameda Street, two located on 6th Street and two hydrants located on Mill Street.

[23] *LAFD, Film Unit, www.lafd.org/film-unit, accessed April 20, 2023.*

[24] *LAFD Film Unit, Studio/Sound Stage Fire & Life Safety Requirements, revised March 2019.*

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[25] Therefore, the Project Site is not located within a fire hazard area.

3. Project Impacts

a. Thresholds of Significance

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

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 City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold.

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

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

b. Methodology

Project impacts regarding fire services are evaluated by the LAFD on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce the demand for fire protection, 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

[25] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5164-010-003; -004; -005, http://zimas.lacity.org/, accessed April 17, 2023.*

companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further 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 and emergency medical services.

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in in that project's CEQA document. 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 acre and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

c. Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.I, 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, 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.[26] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on site.[27] Project construction would also occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to 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 adding construction traffic to the street network and by necessitating partial lane closures for installation of required utility and street improvements. In addition, construction activities would include 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, in accordance with standard practice, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, 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. 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

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[26] *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 April 17, 2023.*

[27] *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 April 17, 2023.*

clear a path of travel or by driving in the lanes of opposing traffic. The Project also includes a Construction Traffic Management Plan, which would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

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 would comprise a total floor area of 675,611 square feet. The existing warehouse structures consisting of approximately 311,000 square feet would be demolished as part of the Project. Therefore, the Project would result in a total net increase of approximately 364,611 square feet of floor area upon full buildout. As such, the Project could potentially increase the demand for LAFD fire protection and emergency medical services. However, it is noted that 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. The proposed uses would be expected to generate a range of fire service calls similar to other studio uses, potentially including electrical fires, car fires, etc. Additionally, filming activities would continue to be subject to the LAFD's Studio/Sound Stage Fire & Life Safety Requirements, and special effects, such as pyrotechnics, would continue to be permitted through LAFD's Film Unit. Accordingly, appropriate safety protocols and equipment would be in place, and the types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment provided on-site combined with that available at the fire stations nearest the Project Site.

The Project Site would continue to be served by Fire Station No. 9, which is the designated "first-in" station for the Project Site, located approximately 0.9 mile northwest of the Project Site at 430 East 7th Street. As provided by the LAFD and summarized in Table IV.H.1-3 on page IV.H.1-16, Fire Station No. 9 is equipped with a truck, two assessment engines, two paramedic rescue ambulances, a BLS rescue ambulance, and a staff of 19. Based on the LAMC criteria regarding response distance, the Project Site would be located outside of the required 0.75-mile response distance from a fire station with an engine company but would be located within the 1.0-mile response distance from a fire station with a truck company. Based on these criteria, the LAFD considers fire protection to

the Project Site to be inadequate.[28] 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 will serve the Project. As the response distance is greater than that which is set forth in Table 57.507.3.3 of the LAMC, in accordance with LAMC Section 57.512.1, all Project structures must be constructed with automatic fire sprinkler systems.

Per LAMC Section 57.4705.4, the Project would be required to provide an emergency helicopter landing facility (EHLF) or implement one of two alternate options to an EHLF 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 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 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 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(3) 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).[29] 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, consistent with *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 and the requirements of the California

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[28] *Written correspondence from Kristen Crowley, Fire Chief, and Orin Saunders, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 7, 2023.*

[29] *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.*

Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, 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 vehicle access, to the Project Site would be provided from two large, gated driveways along 6th Street (referred to as the West Gate and the East Gate), and two additional driveways on Mill Street. An Emergency Vehicle only access driveway would also be located at Alameda Street along the south perimeter of the Project Site, exiting at Mill Street. The Project's driveways and internal circulation would be designed to meet all applicable Building Code and Fire Code requirements regarding site access, including the provision of adequate emergency vehicle access. Compliance with such requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection per LAMC Section 57.118, prior to the issuance of any building permit.

Additionally, operation of the Project would not include the installation of any barriers that could impede emergency vehicle access within or in 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 within the Project's traffic study area. 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.

(iii) Fire Flow

As discussed in the Utility Report included as Appendix L 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 L of this Draft EIR, the required fire flow for the Project Site has been set at 12,000 gpm available to any block.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine the fire flow available to the fire hydrants surrounding the Project Site. Based on the completed IFFAR, of the eight existing fire hydrants surrounding the Project Site, five fire hydrants surrounding the Project Site (in the public right of way) can provide a minimum flow of 1,500 gpm at 20 psi, for a combined total flow of 7,500 gpm (refer to Appendix A of the Utility Report for the results of the IFFAR). In addition, based on the hydraulic analysis performed by LADWP as part of the Service Advisory Request (SAR), LADWP determined that a proposed 10-inch connection off of the 12-inch main in Alameda Street will add an additional flow of up to 5,000 gpm at a pressure of 45 psi. This proposed connection would serve additional on-site fire hydrants. As such, the total flow, including the available flow from surrounding public fire hydrants totaling 7,500 gpm in addition to the private onsite fire service totaling 5,000 gpm, would exceed the 12,000 gpm fire flow requirement set forth by the LAFD. Therefore, as shown by the IFFAR and the SAR Fire Service Pressure Flow Report, the Project would have adequate fire flow and pressure available to demonstrate compliance with LAMC Section 57.507.3.

(iv) Conclusion

Based on the above analysis, the Project would not generate a substantial increased demand for additional fire facilities such that operation of the Project would require new or expanded fire facilities. **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 would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection are the service areas of Fire Station Nos. 9, 17, 4, 25, and 2. The Project, in conjunction with growth forecasted in the City through 2026 (the Project's anticipated buildout year), would cumulatively generate a demand for fire protection service. Cumulative growth in the greater Project area through 2026 includes specific known development projects, growth that may be projected as a result of the land use designations and policy changes contained in the Community Plan Update (DTLA 2040), as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, there are 21 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 implement design features during construction and 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 H 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 will 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 the time. Any requirement for a new fire station or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD will continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

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 similar to existing fire stations and on lots that are between 0.5 acre and 1 acre in size; and (3) would otherwise have their own CEQA 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. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Lastly, consistent with the *City of Hayward v. Board of Trustees of California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b. above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City.

Based on the above, a cumulatively considerable increase in the demand for fire protection services that would require a new fire station, or the expansion of an existing fire station, the construction of which would cause significant environmental impacts, is not anticipated from the operation of the Project or related projects, and cumulative impacts related to fire protection would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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