

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 the Utility Infrastructure Technical Report: Water, Wastewater, and Energy (Utility Report) prepared by KPFF Consulting Engineers (dated July 2024), which is included in Appendix H of this Draft EIR; and inter-departmental correspondence from LAFD to the Department of City Planning (June 16, 2023), which is included in Exhibit 11 of the Utility Report.

2. Environmental Setting

a. Regulatory Framework

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

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency Mutual Aid System
- California Vehicle Code

- California Constitution Article XIII, Section 35
- California Governor's Office of Emergency Services
- City of Los Angeles Charter
- City of Los Angeles General Plan Framework Element
- City of Los Angeles General Plan Safety Element
- Wilshire Community Plan
- 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 Act

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation

activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

(c) Disaster Mitigation Act of 2000

The Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and 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

¹ CBC (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.

(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 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

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.

Cal. App. 4th 833 (*City of Hayward*), 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 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. 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,

**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.
<i>Source: City of Los Angeles, General Plan Framework Element, 2001.</i>	

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 of the Infrastructure and Public Services Chapter 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

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

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 26, 1996 and updated 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 capabilities, as shown in Table IV.H.1-2 on page IV.H.1-9.

(d) Wilshire Community Plan

The Land Use Element of the City's General Plan includes 34 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.

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

**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 Very High Fire Hazard Severity Zones (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.

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

Goal/ Objective/Policy	Description
	• 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.
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster.
Source: City of Los Angeles, General Plan Safety Element, 2021.	

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

Goal 9: Protect the residents of the Wilshire Community area through a comprehensive fire and life safety program.

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

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

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

(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 for high-rise buildings that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

LAMC Section 57.4704.5.1 requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be

kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

LAMC Section 57.4705.1.6 requires there must be at least one elevator which shall be available for fire EMS and shall have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floors. The elevator 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 miles for an engine company to two 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 Project F projects have been completed.⁸ Also, as reported in November 2019, the City of Los Angeles 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.⁹ Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated \$600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.¹⁰

(g) Measure J

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

⁸ *Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb–March 2016.*

⁹ *City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.*

¹⁰ *City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report—February/ March 2016.*

(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 3,510 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. 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.¹¹

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 closest station to the Project Site is Fire Station No. 61, which is the designated “first-in” station, located approximately 0.6 miles north of the Project Site at 5821 West 3rd Street.¹² As provided by the LAFD and summarized in Table IV.H.1-3 on page IV.H.1-17, Fire Station No. 61 consists of a light force, assessment engine, paramedic rescue ambulance, basic life support (BLS) rescue ambulance, emergency medical service (EMS) Supervisor, and a staff of 14.¹³

¹¹ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed June 19, 2026.

¹² Written correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023.

¹³ Written correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023.



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

The secondary fire station that serves the Project Site is Fire Station No. 68, located approximately 1.9 miles south of the Project Site at 5023 West Washington Boulevard. Fire Station No. 68 consists of an engine, paramedic rescue ambulance, battalion supervisor, and a staff of 8.¹⁴ Services provided by these and all other stations in the Project Site vicinity are listed in Table IV.H.1-3 on page IV.H.1-17.

The response times of the nearest fire stations serving the Project Site from January 2025 to December 2025 are shown in Table IV.H.1-4 on page IV.H.1-18. However, it is noted that LAFD has not established response time standards for emergency response or adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds aid in emergency response.¹⁵

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, 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.¹⁶ The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.¹⁷

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, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and *City of Hayward v. Board of Trustees of the California State University* (2015) 242 Cal. App. 4th 833, 847, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services. Thus, the need

¹⁴ Written correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023.

¹⁵ NFPA, *Key Requirements for Emergency Services in NFPA 1710*, June 2020. Response time is turnout time plus travel time for EMS and fire suppression incidents.

¹⁶ LADOT, *Los Angeles Signal Synchronization Fact Sheet*.

¹⁷ LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, Bulletin No. 133, October 2008.

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

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 61 5821 West 3rd Street Los Angeles, CA 90036	0.6 miles	• Light Force • Assessment Engine • Paramedic Rescue Ambulance • BLS Rescue Ambulance • EMS Supervisor	• 14 staff
Fire Station No. 68 5023 Washington Boulevard Los Angeles, CA 90019	1.9 miles	• Engine • Paramedic Rescue Ambulance • Battalion Supervisor	• 8 staff
Fire Station No. 29 4029 West Wilshire Boulevard Los Angeles, CA 90010	2.1 miles	• Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance	• 14 staff
Fire Station No. 41 1439 North Gardner Street Los Angeles, CA 90046	2.8 miles	• Engine • Paramedic Rescue Ambulance	• 6 staff
Fire Station No. 58 1556 South Robertson Boulevard Los Angeles, CA 90035	3 miles	• Assessment Engine • Paramedic Rescue Ambulance • BLS Rescue Ambulance	• 8 staff
<i>Source: Written correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023.</i>			

for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, to the Project Site is currently available via two, two-way driveways along Cloverdale Avenue and Detroit Street that would provide access to the parking area.

(3) Fire Water Infrastructure

As discussed in the Utility Report, included as Appendix H 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

**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. 61	7:57	7:31
Fire Station No. 68	7:25	7:19
Fire Station No. 29	7:31	6:25
Fire Station No. 41	7:57	7:58
Fire Station No. 58	7:46	7:43
^a Response times are based on January 2025–December 2025 data. Source: LAFD, FireStatLA, Stations 61, 68, 29, 41, and 58 Response Metrics for January 2025–December 2025, www.lafd.org/fsla/stations-map, accessed June 19, 2026.		

Project Site via LADWP water lines within the adjacent streets. Specifically, according to the Utility Report, there is an 8-inch water main in Wilshire Boulevard, a 6-inch water main in Cloverdale Avenue, a 6-inch water main in Detroit Street, and a 12-inch water main in 8th Street. In addition, there are multiple domestic water and fire connections coming off of all four nearby streets: one fire hydrant, seven water meters, and one fire department connection on Wilshire Boulevard, one water meter on Cloverdale Avenue, two fire hydrants and one water meter on Detroit Street, and two fire hydrants on 8th Street.

(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 VHFHSZ.¹⁸ Additionally, the Project Site is not identified within a CalFire Fire Hazard Severity Zone.¹⁹ Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones.²⁰

¹⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 5350 Wilshire Boulevard.

¹⁹ CalFire, Fire Hazard Severity Zones, <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>, accessed June 19, 2026.

²⁰ Refer to the Initial Study included as Appendix A of this Draft EIR, for a discussion of wildfire impacts.

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.

This 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 services:

- 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 on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. The evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with 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 an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities is reasonably foreseeable as a direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. In the event that the City determines that expanded or new emergency facilities are warranted, based on existing standards and based on historical development of fire and emergency facilities, 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 acres and one acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration.

c. Project Design Features

No Project Design Features specific to fire protection are proposed. However, as provided in 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 (CTMP) 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 Code of Federal Regulations, Part No. 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.²¹ Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.²² 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.

Project construction could also have the potential to impact the provision of existing LAFD services in the vicinity of the Project Site as a result of construction impacts on the surrounding roadways. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access.

However, both directions of travel would continue to be maintained throughout the construction period and emergency access would not be impeded. In addition, a CTMP would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1, set forth in Section IV.I, Transportation, of this Draft EIR, which is a standard practice that would ensure that adequate and safe access remains available within and near the Project Site during construction activities, by ensuring that 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, and by employing temporary traffic controls such as flag persons, to manage traffic movement during temporary traffic flow disruptions. Traffic management

²¹ *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, accessed August 26, 2023.*

²² *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, accessed May 18, 2023.*

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 right-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

The Project Site would continue to be served by Fire Station No. 61, which is the designated “first-in” station for the Project Site, located 0.6 miles north of the Project Site at 5821 West 3rd Street.²³ As provided by the LAFD and summarized in Table IV.H.1-3 on page IV.H.1-17, Fire Station No. 61 is equipped with a light force, assessment engine, paramedic rescue ambulance, BLS rescue ambulance, EMS Supervisor, and a staff of 14.²⁴ As such, based on the LAMC criteria regarding response distance, the Project Site is located within the required 0.75-mile response distance from a fire station with an engine company and within the one miles response distance from a fire station with a truck company. Therefore, LAFD has determined fire protection (based on the response distance from existing fire stations criteria) to be adequate.²⁵

As discussed in Section II, Project Description, of this Draft EIR, the Project proposes a mixed-use development comprised of residential and commercial uses with associated parking on a 59,168-gross-square-foot site. The Project would construct a residential tower atop a six-story podium comprised of up to 419 residential units, 44,737 square feet of commercial floor area inclusive of 36,737 square feet of restaurant uses and 8,000 square feet of office uses, and 47,534 square feet of open space. Specifically, 42,092 square feet of commercial floor area would be retained and repurposed and 6,137 square feet of existing buildings would be demolished. In total, new development would include 420,201 square feet of floor area. Based on the employee generation rates of the City’s vehicle miles traveled

²³ LAFD, *Find Your Station*, www.lafd.org/fire-stations/station-results, accessed June 19, 2026.

²⁴ LAFD, *Find Your Station*, www.lafd.org/fire-stations/station-results, accessed June 19, 2026.

²⁵ Written correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023.

(VMT) Calculator, the Project is anticipated to generate approximately 986 residents and 26 net new employees.^{26,27} Therefore, the Project would increase the building area and daytime population of the Project Site compared to existing conditions and would increase the demand for LAFD fire protection services. 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. Overall, the types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site.

Further, the Project would implement Los Angeles Building and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit.

The Project is a high-rise building as defined by LAFD (i.e., greater than 75 feet in height measured from the lowest point with fire access). As a result, LAMC Section 57.4705.4 requires an emergency helicopter landing facility on the roof of each high-rise building or that alternate provisions be made. Specifically, LAFD Requirement No. 10 allows the implementation of one of two alternate options with approval of the Fire Marshal: (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. In accordance with LAMC Section 57.4705.4, the Project would provide an emergency helicopter landing facility on Level 46 of the tower. The Project would also implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, and alarm and communications systems, including those requirements set forth in the written correspondence from the LAFD included as Exhibit

²⁶ Fehr & Peers, *Wilshire and Cloverdale Project Transportation Assessment*, November 2024.

²⁷ Generation rates are embedded in the VMT Calculator. The resident generation rate of 2.253 persons per unit for "Multi-Family Residential" land use is applied to 372 new market-rate residential units, the resident generation rate of 3.14 persons per unit for "Affordable Housing – Family" is applied to the 47 affordable residential units, the employee generation rate of 4.0 employees per 1,000 square feet for "General Office" is applied to the existing and proposed office uses, the employee generation rate of 2.0 employees per 1,000 square feet for "General Retail" is applied to the existing retail uses, and the employee generation rate 4.0 per 1,000 square feet for "High-Turnover Sit-Down Restaurant" is applied to the existing and proposed restaurant uses. Therefore, the Project would result in approximately 986 new residents and 26 net new employees.

11 of the Utility Report. 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 for new construction projects, as set forth in LAMC Section 57.118 and must be satisfied prior to the issuance of a building permit.

Overall, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features that would reduce the demand on LAFD facilities and equipment resulting from the Project are provided. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD, and therefore would 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, the Safety Element, and the Wilshire Community Plan, as listed in the regulatory framework above, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities, and coordinate the development of new fire facilities to be phased with growth. Furthermore, if new facilities were needed in the future, associated construction would be required to undergo separate environmental review per CEQA, and physical environmental impacts would be addressed, as necessary. Therefore, Project impacts with regard to LAFD facilities and equipment would be less than significant.

(ii) Emergency Access

As discussed in Section II, Project Description, of this Draft EIR, emergency access to the Project Site would be provided via two, two-way driveways along Cloverdale Avenue and Detroit Street that would provide access to the parking area. Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. All driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Furthermore, the area surrounding the Project Site includes an established street system, consisting of freeways, 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.

In addition, 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. Overall, emergency access to the Project Site and surrounding area would be maintained, and impacts with regard to emergency access would be less than significant.

(iii) Fire Flow

As discussed in the Utility Report included as Appendix H 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 by LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided as Exhibit 11 of the Utility Report, the required fire water flow for the Project Site has been set at 12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required).²⁸ A minimum residual water pressure of 20 psi is to remain in the water system. In addition, all hydrants must be spaced to provide adequate coverage of the building exterior.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. Based on the completed IFFAR included as Exhibit 4 of Appendix H of the Utility Report, there would not be sufficient capacity in the existing water infrastructure system and system upgrades would be necessary to meet the fire flow demand for the Project.

In accordance with LAMC Section 57.4705.4, the Project would incorporate a fire sprinkler suppression system in the proposed tower to reduce the public hydrant demands. In addition, as part of the Project, required water service upgrades necessary to achieve the adequate fire flow would be implemented. As discussed in Section IV.K.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, in order to meet fire flow requirements, the Project would be required to provide upgrades including replacing a portion of the existing 6-inch water main in Detroit Street and installation of three new fire hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard. Required improvements and associated construction-related impacts are discussed further in Section IV.K.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR. Therefore, through compliance with LAFD and LADWP

²⁸ *Written correspondence from David Perez, Fire Marshall, Los Angeles Fire Department, Fire Development Services Section, Hydrants and Access Unit, June 16, 2023.*

requirements, the Project's fire flow impacts to water infrastructure would be less than significant.

(iv) Conclusion

Based on the analysis above and the requirement stated in the California Constitution Article XIII, 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 as Exhibit 11 of the Utility Report, 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, no other impacts to fire protection services would occur. **Therefore, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the 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. Therefore, impacts to fire protection during Project operation would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts 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 services are the service areas of Fire Station Nos. 61, 68, 29, 41, and 58. The Project, in conjunction with growth forecasted in the City through 2029 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection services. Cumulative growth in the greater Project area through 2029 includes specific known development projects, as well as general ambient growth, as described in Section III, Environmental Setting, of this Draft EIR.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 5 is a conservative assumption, as some of the related projects may not be built out by 2029, may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 5 are fully built out by 2029, unless otherwise noted.

(a) Construction

Like 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.

Should Project construction occur concurrently with one or more of the related projects located in close proximity to the Project Site, specific coordination among these multiple construction sites would be implemented as required by the CTMP for the Project and the related projects, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, as parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by LADOT, would be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As such, the Project would not have significant impacts on access and safety.

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, construction-related traffic generated by the Project and the related projects would not significantly impact LAFD response times within the Project Site vicinity as drivers of fire and emergency vehicles normally have a variety of options for avoiding traffic, such as 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 in and of itself would not cause a significant impact to

fire protection services during construction, the Project's contribution to an impact to fire protection services would be not be cumulatively considerable.

(b) Operation

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 61, 68, 29, 41, and 58. The increase in development and service populations from the Project, related projects, as well as other future developments in the Wilshire Community Plan area would result in a cumulative increase in the demand for LAFD services. As concluded in the written correspondence from the LAFD included as Exhibit 11 of the Utility Report, development of the Project, as well as the related projects may result in the need for increased staffing, additional fire protection facilities, or the relocation of present fire protection facilities. However, similar to the Project, the related projects and other future development projects in the Wilshire Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services and to ensure adequate fire flow. Furthermore, each related project and other future development projects in the Wilshire Community Plan area would be required to comply with regulatory requirements related to fire protection. In addition, the Project, related projects, and other future development projects in the Wilshire Community Plan area would be subject to the City's standard construction permitting process, which includes a 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. Similar to the Project, the related projects and other future development projects in the Wilshire Community Plan area would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City.

Cumulative increases in demand for fire protection and emergency medical services due to related projects and other future development projects in the Wilshire Community Plan area 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 would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

Lastly, consistent with the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b.(1) above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or Mitigated Negative Declaration and would not be expected to result in significant impacts.²⁹ Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA. Further analysis, including a specific location, would be speculative and beyond the scope of this document. Lastly, consistent with *City of Hayward v. Board of Trustees of California State University* 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, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered governmental facilities (i.e., fire) or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. As such, the Project's contribution would not be cumulatively considerable, and cumulative operational impacts on fire protection services 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.

²⁹ Although an EIR was prepared for the construction of LAFD Fire Station No. 39, the EIR concluded there would be no significant impacts. See Notice of Determination for Van Nuys Fire Station 39.

(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.