

IV. Environmental Impact Analysis

O. Wildfire

1. Introduction

This section evaluates the Project’s potential impacts related to wildfire associated with development of the Project Site. The California Board of Forestry and Fire Protection’s State Responsibility Area (SRA) Viewer¹ and the City of Los Angeles Fire Department’s Fire Zone Map Viewer² were consulted.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) *Strategic Fire Plan for California*

The Board of Forestry and Fire Protection (Board) develops and adopts the Strategic Fire Plan pursuant to broad direction provided under Public Resources Code (PRC) Sections 4114 and 4130. The Board has adopted these plans since the 1930s and periodically updates them to reflect current and anticipated needs, most recently in 2018. The 2018 Strategic Fire Plan for California (2018 Plan)³ reflects the California Department of Forestry and Fire Protection’s (CAL FIRE) focus on (1) fire prevention and suppression activities to protect lives, property, and ecosystem services, and (2) natural resource management to maintain the state’s forests as a resilient carbon sink to meet California’s climate change goals and to serve as important habitat for adaptation and mitigation. The 2018 Plan establishes a “vision for a natural environment that is more fire resilient; buildings and infrastructure that are more fire resistant; and a society that is more aware of and responsive to the benefits and threat of wildland fire; all achieved through local, state, federal, tribal, and private partnerships. The Board identifies the following goals as critical to achieving the 2018 Plan’s vision:

¹ California Board of Forestry and Fire Protection, *State Responsibility Area Interactive Map Viewer*, accessed February, 1, 2019.
² City of Los Angeles Fire Department, *Fire Zone Map Viewer*, accessed February 1, 2019.
³ California Board of Forestry and Fire Protection, *2018 Strategic Fire Plan for California*, August 22, 2018.

- Improve the availability and use of consistent, shared information on hazard and risk assessment;
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities;
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans (CWPP);
- Increase awareness and actions to improve fire resistance of man-made assets at risk and fire resilience of wildland environments through natural resource management;
- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers;
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services; and
- Implement needed assessments and actions for post-fire protection and recovery.

(b) California State Responsibility Area

The SRA is the area in the state where California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA is comprised of over 31 million acres across the entire state to which CAL FIRE provides a basic level of wildland fire prevention and protection services. Lands in the SRA are based on vegetative cover and natural resource values. SRA lands include state and privately-owned forest, watershed, and rangeland. The SRA does not include lands within incorporated city boundaries or in federal ownership.

State law describes the SRA in Sections 4125 - 4128 of the Public Resources Code. Specifically, Section 4126 states that the SRA includes:

- Lands covered wholly or in part by forests or by trees capable of producing forest products;
- Lands covered wholly or in part by timber, brush, undergrowth, or grass, whether of commercial value or not, which protect the soil from excessive erosion, retard runoff of water, or accelerate water percolation, if such lands are sources of water which is available for irrigation or for domestic or industrial use; and

- Lands in areas which are principally used or useful for range or forage purposes, which are contiguous to other lands so defined.

(2) Local

(a) *City of Los Angeles Very High Fire Hazard Severity Zone*

As a result of the Oakland Hills Fire of 1991, AB 337 was passed in 1992 requiring CAL FIRE to work with local governments to identify high fire hazard severity zones within local responsibility areas throughout each county in the state. In response, the City first established the Very High Fire Hazard Severity Zone (VHFHSZ) in 1999. The VHFHSZ replaced the older “Mountain Fire District” and “Buffer Zone.”

Los Angeles Municipal Code (LAMC) Chapter IX, Article 1, Division 72, Section 91.7201 establishes the geographical boundaries and design requirements of the VHFHSZ. The VHFHSZ comprises most of the hilly and mountainous regions of the City. It includes portions of the following communities: Baldwin Hills, Bel Air Estates, Beverly Glen, Brentwood, Castellammare, Chatsworth, Eagle Rock, East Los Angeles, Echo Park, El Sereno, Encino, Glassell Park, Granada Hills, Hollywood, Lake View Terrace Los Angeles, Los Feliz, Montecito Heights, Monterey Hills, Mount Olympus, Mount Washington, Pacific Palisades, Pacoima, Palisades Highland, Porter Ranch, San Pedro, Shadow Hills, Sherman Oaks, Silver Lake, Studio City, Sunland, Sun Valley, Sylmar, Tarzana, Tujunga, West Hills, Westwood, Woodland Hills.^{4,5}

Division 72 of the LAMC also outlines the specific building requirements related to fire protection and suppression with which buildings located within the VHFHSZ must comply, such as type of construction permitted and requirements for exterior wall and roof coverings as they relate to the fire resistance and rating of the construction materials.

(b) *Los Angeles Fire Department Strategic Plan 2018-2020*

The LAFD Strategic Plan 2018-2020⁶ contains strategies and tasks for achieving the five goals for the Plan’s two-year period discussed in greater detail in **Section IV.J.1, Public Services – Fire Protection**, of this Draft EIR. Specific strategies and tasks that relate to wildfire include:

- Strategy 3: Improve fire suppression services
 - Expand the cadre of wildland qualified Command Officers

⁴ *City of Los Angeles, Fire Department, Fire Zone History, Very High Fire Severity Zone Website, accessed: July 9, 2020.*

⁵ *City of Los Angeles, Fire Department, Fire Zone Map Interactive Viewer, accessed: July 9, 2020.*

⁶ *City of Los Angeles, Fire Department, A Safer City 2.0, Strategic Plan 2018-2020, 2018.*

- Enforce the “No Trespassing” Ordinance in the VHFHSZ to increase public safety and reduce risk of fires
- Strategy 16: Develop homeless encampment survey program for VHFHSZ and other areas of the City
 - Create task force with partnering agencies to complete initial sweep of at-risk brush areas to develop long-term mitigation measures
 - Validate property ownership and identify proper entities for enforcement
 - Institutionalize VHFHSZ survey probes by activating during brush clearance activities, issuance of annual Brush Departmental Bulletin and as necessary by field resources

(c) Los Angeles Municipal Code

The Los Angeles Fire Code is a portion of the LAMC, Chapter V, Article 7, Fire Protection and Prevention (Fire Code)⁷ governs and concerns fire protection and prevention. The Fire Code provides that the prevention of fires; the investigation of fires or 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; the regulation of the storage, use, and handling of hazardous materials; and enforcement of basic building regulations of the State Fire Marshal as they apply to the City in relation to fire, panic, and explosion safety, are administered by the Los Angeles Fire Department’s Bureau of Fire Prevention and Public Safety.⁸ All construction within the City must comply with the applicable division within Chapter V, Article 7, of the LAMC.

LAMC Section 57.322 establishes specific requirements for vegetation surrounding structures. Specifically, Sections 57.322.1.1.1 and 57.322.1.1.7 specify clearance and maintenance requirements for hazardous vegetation and combustible growth surrounding any structure within 100- and 200-feet, respectively. LAMC Section 57.322.1.1.8 further establishes criteria for maintenance of landscape vegetation in such a condition as not to provide an available fuel supply to augment the spread or intensity of a fire. These criteria include, but are not limited to eucalyptus, acacia, palm, pampas grass, and conifers such as cedar, cypress, fir, juniper, and pine.

⁷ *City of Los Angeles, Municipal Code, Chapter V, Article 7, Fire Protection and Prevention (Fire Code), repealed and replaced entirely by Ordinance Number 184,913, effective May 30, 2017.*

⁸ *City of Los Angeles Municipal Code, Chapter V, Article 7, Section 57.01.02, Amended in Entirety, Ordinance Number 162,123, effective May 12, 1987.*

b) Existing Conditions

(1) California Wildfire

Fire is a primary driving force that has shaped California's ecosystems for millennia, recurring at varying intervals in virtually all vegetation types. It is estimated that between 4.5 and 12 million acres burned annually prior to Euro-American settlement.⁹ Wildland fire activity is closely connected to climate and continues to be an endemic part of natural systems of much of the state. The modern era has seen a marked change in natural fire regimes due to land management practices and fire suppression. The disruption of fire regimes within ecosystems has created conditions across California that, in concert with climate change and expanding development, are manifesting themselves in the form of increased wildland fire impacts, with ecological, economic and human consequences. Recent trends have shown an increase in the number of ignitions, area burned, and impacts to ecosystems. Since 2000, the average annual acres burned in California has more than doubled the average of the 1960s. Average annual area burned within the state since 2000 has maintained at a rate of approximately 700,000 acres each year.¹⁰

Demographic pressures continue to put more people, homes, and infrastructure in harm's way from wildland fire. The most recent assessment of California's Wildland-Urban Interface shows that as of 2010, there were about 3 million housing units in Fire Hazard Severity Zones (FHSZ)¹¹ that are potentially at risk from wildland fire. The top five counties for FHSZ housing units, all in southern California and which includes Los Angeles County, contain about half of all statewide housing units in FHSZ.¹² Further, since the frequency of extreme weather events is projected to increase, urban areas both immediately adjacent to and near wildlands are also at risk. Recent wildland fires also have demonstrated that post-fire events can cause substantial loss of life and damage to property and natural resources.

(2) Project Site

The Project Site is located in an improved urban area in the east part of Downtown Los Angeles, commonly known as the Arts District. The Project Site and surrounding area are relatively flat and do not contain any significant slope. The Project Site is not located

⁹ State Board of Forestry and Fire Protection and California Department of Forestry and Fire Protection (CAL FIRE), 2018 Strategic Fire Plan for California, August 22, 2018, page 6.

¹⁰ State Board of Forestry and Fire Protection and California Department of Forestry and Fire Protection (CAL FIRE), 2018 Strategic Fire Plan for California, August 22, 2018, page 7.

¹¹ Fire Hazard Severity Zones are identified at the state level by the California Department of Forestry and Fire Protection and are used to determine the City's Very High Fire Hazard Severity Zones.

¹² State Board of Forestry and Fire Protection and California Department of Forestry and Fire Protection (CAL FIRE), 2018 Strategic Fire Plan for California, August 22, 2018, page 9.

in or near the SRA; the nearest part of the SRA is located approximately 11.5 miles to the southeast in Hellman Park, north of the City of Whittier.¹³ Additionally, the Project Site is not located in or near the VHFHSZ; the nearest very high fire severity zone is located approximately 2.4 miles to the north in Elysian Park.¹⁴ The Project Site is near County- and City-designated disaster routes, specifically, Alameda Street, approximately 0.4-mile to the west, and E. 4th Street, approximately 0.4-mile to the north.¹⁵

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines*, if located in or near the SRA or lands classified as VHFHSZ, the project would have a significant impact related to wildfire if the project would:

- a) ***Substantially impair an adopted emergency response plan or emergency evacuation plan; or***
- b) ***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; or***
- c) ***Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or***
- d) ***Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

The *L.A. CEQA Thresholds Guide* does not include any criteria to evaluate wildfire impacts. Thus, the potential for the Project to result in impacts related to wildfire is based on the *State CEQA Guidelines* Appendix G thresholds.

¹³ California Board of Forestry and Fire Protection, *State Responsibility Area Map Viewer*, accessed February, 1, 2019.

¹⁴ City of Los Angeles Fire Department, *Fire Zone Map Viewer*, accessed February, 1, 2019.

¹⁵ Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area*, accessed: April 24, 2017; and City of Los Angeles Department of City Planning, *General Plan Safety Element, Exhibit H, Critical Facilities & Lifeline Systems in the City of Los Angeles*, Adopted November 1996.

b) Methodology

The analysis of impacts regarding wildland fires in the Project area considers the existing regulations detailed in the Regulatory Setting discussion above (including the state and local strategic plans and LAMC pertaining to SRAs and the VHFHSZ) that address fire hazards and future uses and activities in the Project area that would occur as a result of the Project. Based on these considerations, a determination is made as to whether there would be an increased potential for wildland fire hazards to occur in the Project Area.

c) Project Design Features

No specific Project Design Features are proposed with regards to wildfire.

d) Analysis of Project Impacts

As compared to the Project, the Increased Commercial Flexibility Option (Flexibility Option) would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. Furthermore, wildfire impacts are site- and land use-specific and dependent on a project's proximity to the SRA and the VHFHSZ as well as the slope and prevailing wind conditions. The Flexibility Option would be located on the same Project Site, outside of the SRA and the VHFHSZ, with the same proximity to disaster routes, slope and prevailing wind conditions, and infrastructure requirements, and would result in the same changes to Site drainage as the Project. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

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

Because the Flexibility Option would be located on the same Project Site within the same proximity to disaster routes as the Project, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

As previously discussed, the Project Site is not located in or near the SRA or the VHFHSZ. Furthermore, as detailed in **Section IV.E, Hazards and Hazardous Materials**, of this

Draft EIR, although the Project Site is located near county- and City-designated disaster routes, neither construction nor operation of the Project would impair or physically interfere with an adopted emergency response plan. As detailed in Section **IV.J.1, Public Services – Fire Protection**, of this Draft EIR, access for emergency service providers and evacuation routes would be maintained during construction (as required by PDF TR-1 in **Section IV.K, Transportation**, of this Draft EIR). Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete. In addition, operation of the Project would not cause permanent alterations to vehicle circulation routes and patterns, or impede public access or travel upon public rights-of-way. All new development in the City is required to comply with existing fire codes and ordinances regarding emergency access, such as widths, surfaces, vertical clearance, brush clearance, and allowable grades. **Accordingly, construction and operation of the Project and the Flexibility Option would have no impact on adopted emergency response plans or emergency evacuation plans as they pertain to the SRA or the VHFHSZ and no mitigation measures would be required.**

(2) Mitigation Measures

Under both the Project and the Flexibility Option, no impacts to emergency response or evacuation plans within the SRA or the VHFHSZ would occur; no mitigation measures would be required.

(3) Level of Significance after Mitigation

Under both the Project and the Flexibility Option, no impacts to emergency response or evacuation plans within the SRA or the VHFHSZ would occur.

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

Because the Flexibility Option would be located on the same Project Site with the same slope and prevailing wind conditions as the Project, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

Construction would involve the use of some flammable materials such as gasoline, diesel fuel, hydraulic oils, paints, solvents, or other wastes. However, the probability of a wildfire to occur as a result of unmitigated Project construction would be low as the Project Site is located within an urban, developed portion of the City with low fuel load. Furthermore, all construction equipment is required to have fire suppression equipment (such as a fire extinguisher) on board or at the work site. As detailed above, the Project Site is not located in or near the SRA or the VHFHSZ. Furthermore, the Project Site and surrounding area are flat and not located in a high wind velocity area¹⁶ or downslope or downwind of a SRA or the VHFHSZ. Therefore, the Project would not have the potential to expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. **Accordingly, construction and operation of the Project and the Flexibility Option would have no impact with regard to pollutant concentrations or uncontrolled spread of wildfire as it pertains to the SRA or the VHFHSZ and no mitigation measures would be required.**

(2) Mitigation Measures

Under both the Project and the Flexibility Option, no impacts related to pollutant concentrations from wildfire would occur; no mitigation measures would be required.

(3) Level of Significance after Mitigation

Under both the Project and the Flexibility Option, no impacts related to pollutant concentrations from wildfire would occur.

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

Because the Flexibility Option would be located on the same Project Site with the same infrastructure requirements as the Project, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

¹⁶ City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed: August 14, 2019.

(1) Impact Analysis

See **Threshold a)** in **Section IV.M.1, Utilities – Water**, of this Draft EIR for additional discussion with regard to water infrastructure and **Threshold a)** in **Section IV.I, Population and Housing**, of this Draft EIR for additional discussion with regard to the extension of roads. As detailed under those thresholds, construction and operational impacts related to the on-site installation of water distribution lines and circulation improvements would be less than significant as they pertain to water supply and population and housing impacts. With regard to wildfire, as detailed above, the Project Site is not located in or near the SRA or the VHFHSZ. As such, the Project would not require the installation or maintenance of associated infrastructure nor are such features proposed for the Project. **Accordingly, construction and operation of the Project and the Flexibility Option would have no impact with regard to the installation and maintenance of infrastructure as it pertains to the SRA or the VHFHSZ and no mitigation measures would be required.**

(2) Mitigation Measures

Under both the Project and the Flexibility Option, no impacts related to the installation and maintenance of infrastructure within the SRA or the VHFHSZ would occur; no mitigation measures would be required.

(3) Level of Significance after Mitigation

Under both the Project and the Flexibility Option, no impacts related to the installation and maintenance of infrastructure within the SRA or the VHFHSZ would occur.

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

Because the Flexibility Option would be located on the same Project Site as the Project and would result in the same changes to site drainage as the Project, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

As detailed above, the Project Site is not located in or near the SRA or the VHFHSZ. Furthermore, the Project Site and surrounding area are flat and are not susceptible to flooding or landslides. In addition, as detailed in **Section IV.F, Hydrology and Water Quality**, of this Draft EIR, construction of the Project would be required to obtain coverage under the NPDES General Construction stormwater permit. In accordance with the

requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows. As also detailed in **Section IV.F**, implementation of the Project would not significantly alter drainage patterns compared to existing conditions and runoff from the Project Site would continue to drain via sheetflow toward the City streets during operation. The Project would not modify the surrounding streets with respect to the manner in which they convey runoff to the City storm drain system. Furthermore, the Project Site is not located within a flood zone¹⁷ or within an area identified as having potential for landslides (see **Section IV.C, Geology and Soils**, of this Draft EIR). Therefore, the Project would not have the potential to expose people or structures to downslope or downstream flooding or landslides. **Accordingly, construction and operation of the Project and the Flexibility Option would have no impact with regard to flooding or landslides as a result of runoff, post-fire slope instability, or drainage change within the SRA or the VHFHSZ and no mitigation measures would be required.**

(2) Mitigation Measures

Under both the Project and the Flexibility Option, no impacts related to flooding or landslides within the SRA or the VHFHSZ would occur; no mitigation measures would be required.

(3) Level of Significance after Mitigation

Under both the Project and the Flexibility Option, no impacts related to flooding or landslides within the SRA or the VHFHSZ would occur.

4. Cumulative Impacts

Because the Flexibility Option would be located on the same Project Site as the Project and would include the same construction and operational activities with the same potential for wildfire hazards as the Project, the conclusions regarding the cumulative impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

a) Impact Analysis

The study area for the wildfire cumulative impacts analysis is the greater City of Los Angeles area, specifically, the extent of the related project sites, as listed in **Section III, Environmental Setting**, and shown **Figure III-2**. Given the close proximity and high-intensity nature of the uses proposed under the 20 Related Projects, the associated

¹⁷ *City of Los Angeles Department of City Planning, Zone Information & Map Access System, accessed: August 14, 2019.*

increase in development and population could incrementally increase the risks of wildfire in the vicinity. However, none of the 20 Related Projects are located within the SRA or within the VHFHSZ and all are located within the flat, urbanized setting of Downtown Los Angeles outside of flood zones and high wind velocity areas. Given the urbanized nature of the Related Project sites and their locations outside of the SRA and VHFHSZ, it is unlikely that their development would require the installation or maintenance of wildfire-associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities). Related Projects would also be required to submit project-specific emergency response plans to the LAFD during review of plans as part of the building permit process, and work site traffic control plans to LADOT prior to the start of construction. Furthermore, all projects within the City are required to maintain access for emergency service providers and to evacuation routes during construction and operation. Additionally, as with the Project, all Related Projects would be required to comply with applicable building and fire code requirements, including fuel-modification requirements. **Therefore, the cumulative impact related to wildfire would be less than significant and the Project's contribution would not be considerable.**

b) Mitigation Measures

Under both the Project and the Flexibility Option, cumulative impacts related to wildfire would be less than significant; no mitigation measures would be required.

c) Level of Significance after Mitigation

Under both the Project and the Flexibility Option, cumulative impacts related to wildfire would be less than significant without mitigation.