IV. Environmental Impact Analysis

J. Public Services

1. Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning (June 11, 2018), which is included in **Appendix K** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

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

- Occupational Safety and Health Administration
- Federal Emergency Management Act (FEMA)
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency Aid System
- California Vehicle Code
- California Constitution Article XIII, Section 35
- California Governor's Office of Emergency Services (Cal OES)
- City of Los Angeles Charter
- City of Los Angeles General Plan Framework Element
- City of Los Angeles General Plan Safety Element
- Central City North Community Plan
- Los Angeles Municipal Code

- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA as well as 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 (FEMA)

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

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)
- 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 (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). California Building Code 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 2019 edition of the California Building Code became effective on January 1, 2020.[1] The building standards in the California Building Code 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 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

1 California Building Code, (California Code of Regulations, Title 24, Part 2).

2 Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014, https://www.lafd.org/sites/default/files/pdf_files/lafdlafdreport186489186_07312014.pdf. Accessed August 22, 2022.

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 OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.[4]

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls. 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

[3] California Emergency Management Agency, Mutual Aid Plan, https://www.caloes.ca.gov/wp-content/uploads/Fire-Rescue/Documents/CalOES_-_Fire_and_Rescue_-_Mutual_Aid_Plan.pdf. Accessed August 22, 2022.

[4] California Emergency Management Agency, Mutual Aid Plan, https://www.caloes.ca.gov/wp-content/uploads/Fire-Rescue/Documents/CalOES_-_Fire_and_Rescue_-_Mutual_Aid_Plan.pdf. Accessed August 22, 2022.

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. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services".

(e) California Governor's Office of Emergency Services (Cal OES)

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). California Emergency Management Agency (Cal-EMA) 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.[5]

(b) 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.J.1-1**, **Relevant General Plan Framework Element**

[5] See also, Los Angeles Administrative Code Sections 22.62 et. seq.

Infrastructure and Public Services Goals, Objectives, and Policies. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure.[6] Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.[7] This is consistent with the specifications for response distances within the LAMC, discussed below.

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

Goal/Objective/Policy	Description
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
Policy 9.17.2	Identify areas of the City with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Policy 9.17.4	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes, or considering discretionary land use permits.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.
Source: City of Los Angeles, General Plan Framework Element, 2001.	

[6] City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services, https://planning.lacity.org/cwd/framwk/chapters/09/09.htm. Accessed August 22, 2022.

[7] City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire, https://planning.lacity.org/cwd/framwk/chapters/09/09.htm. Accessed August 22, 2022.

(c) Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 26, 1996, 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.J.1-2,** Relevant General Plan Safety Element Goals, Objectives, and Policies. In addition, the City's Safety Element designates disaster routes. The Safety Element designates Alameda Street as a selected disaster route.[8]

Table IV.J.1-2
Relevant General Plan Safety Element Goals, Objectives, And Policies

Goal/Objective/Policy	Description
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. [All Emergency Operations Organization (EOO) emergency response programs and all hazard mitigation and disaster recovery programs related to protecting and reestablishing communications and other infrastructure, service and governmental operations systems implement this policy.]
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.] The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: • Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. • Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. • If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress. • The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 (gallons per minute (gpm) would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or

[8] Los Angeles City Department of Planning, Safety Element, Exhibit H, December 1990.

Table IV.J.1-2
Relevant General Plan Safety Element Goals, Objectives, And Policies

Goal/Objective/Policy	Description
	more gpm, not less than 3 engine companies and 2 truck companies. These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.
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. [All EOO recovery programs involving cooperative efforts between entities implement this policy.]
Source: City of Los Angeles, General Plan Safety Element, 1996.	

(d) Central City North Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to fire protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As previously discussed, in **Section IV.D, Land Use and Planning**, of this Draft EIR, the Project Site is located within the boundary of the Central City North Community Plan. The Central City North Community Plan contains the following fire protection objective and policies applicable to the Project in Chapter III, Land Use Policies and Programs, Fire Protection[9]:

> **Objective 9-1:** Ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City North.

[9] Los Angeles City Department of Planning, Central City North Community Plan, https://planning.lacity.org/odocument/e06434a6-341a-48ed-97dc-8f6a85780951/Central_City_North_Community_Plan.pdf, Accessed August 22, 2022.

Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demand.

(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.

Section 57.106.5.2 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.

Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: Fire Department 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.

Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

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 the Department of Building and Safety and LAFD.

Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

Section 57.4704.5.1 of the LAMC 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.

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.

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.

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.

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.

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.

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.

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

(f) Propositions F and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 19 new or replacement neighborhood Fire/Paramedic Stations and an Emergency Air Operations and Helicopter Maintenance Facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.[10] Also, as reported in November 2019, BOE completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.[11] 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

[10] Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb-March 2016, https://eng2.lacity.org/projects/fire_bond/documents/current_monthly_report.pdf. Accessed August 22, 2022.

[11] City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019, https://eng2.lacity.org/newsletters/2019/11-6-19%20Newsletter.pdf. Accessed August 22, 2022.

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.[12]

(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. 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.

(h) Los Angeles Fire Department Strategic Plan 2018-2020

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development.[13]

b) Existing Conditions

(1) Fire Protection Services and Facilities

Fire prevention, fire suppression, and life safety services in the City are provided by the LAFD. The LAFD has 3,246 uniformed personnel and 353 non-uniformed professional support staff.[14] Services of the LAFD include fire prevention, firefighting, emergency medical care, technical

[12] City of Los Angeles, A 2002 Proposition F Citywide Safety Bond Program Progress Report – February/March 2016, http://www.lapropq.org/modules/fileUpload/files/Prop%20Q%20Monthly%20Feb%20Mar%202016%20Report.pdf. Accessed August 22, 2022.

[13] LAFD 2018-2020 Strategic Plan, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, Accessed August 22, 2022.

[14] Los Angeles Fire Department, About, Organization, https://www.lafd.org/about/organization. Accessed August 22, 2022.

rescue, hazardous materials mitigation, disaster response, public education, and community service. As of April 2019, a professionally trained staff of 1,018 firefighters (including 270 paramedic-trained personnel) are on duty at all times at 106 neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.[15]

The Project Site is located within LAFD's Central Bureau which is broken down into three battalions: Battalions 1, 2, and 11.[16] There are four LAFD fire stations located within a 2-mile radius of the Project Site and an additional station located approximately 2.8 miles from the site as shown in **Figure IV.J.1-1, Fire Station Location Map**. **Table IV.J.1-3** presents the Fire Stations, distance to Project Site, staffing levels and apparatus.

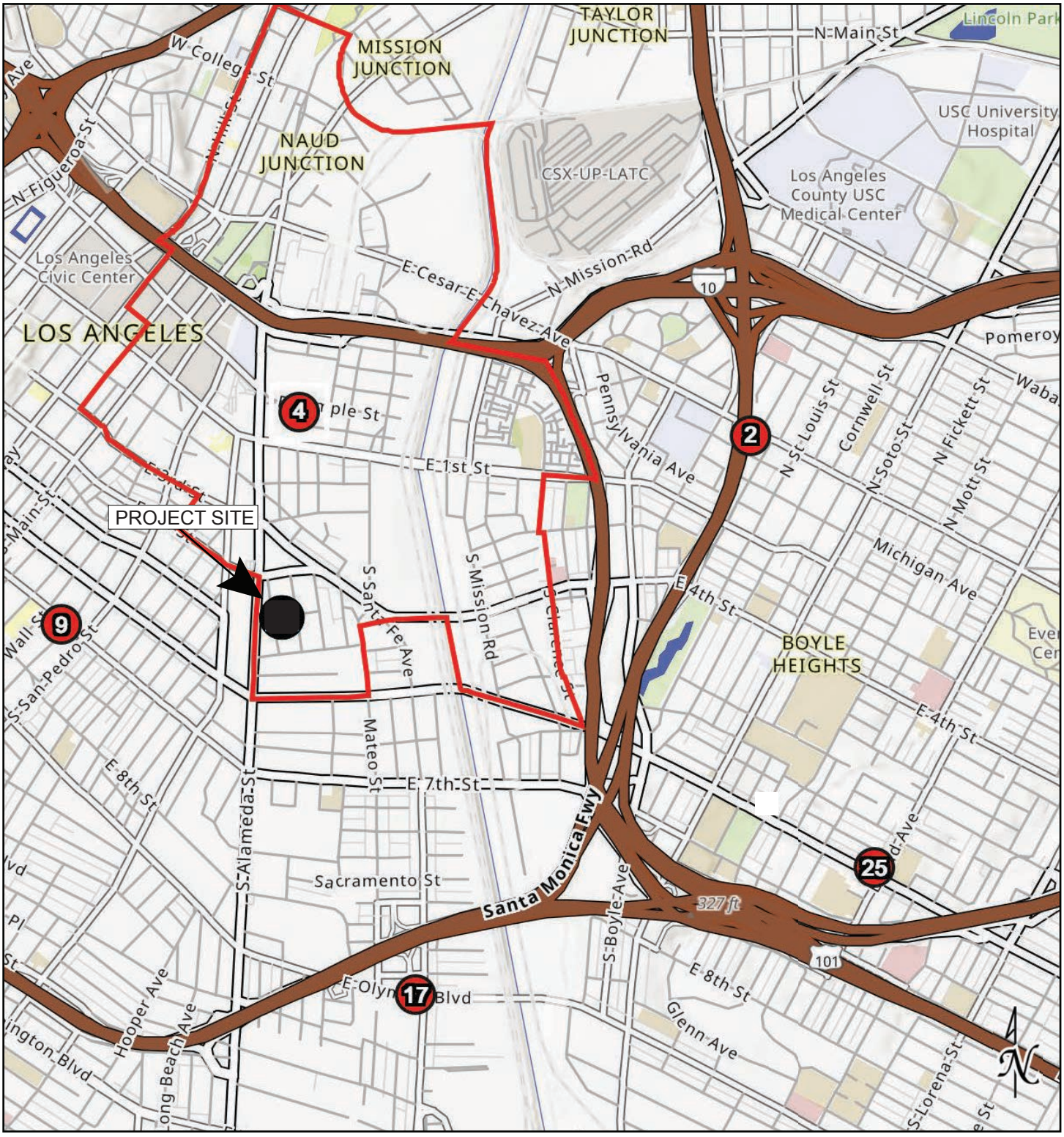
The two closest stations to the Project Site are Fire Stations No. 9 and No. 4, both located approximate 1.1 miles from the Project Site. As indicated in **Table IV.J.1-3, Fire Stations Serving the Project Site**, Fire Station No. 4, located at 450 E. Temple Street is located north of the Project Site. There are nine members including an EMS Battalion Captain, an engine, paramedic rescue ambulance and BLS rescue ambulance. Station No. 9 is located at 430 E. 7th Street, west of the Project Site and has 12 members, an engine, truck and basic life support ambulance (BLS).[17] Although not within the one-mile maximum response distance for engine companies, they are within the 1.5-mile maximum response distance for truck companies.[18]

Table IV.J.1-3
Fire Stations Serving the Project Site

Fire Station and Address	Distance to Project Site (miles)	Staff	Equipment & Services
Fire Station No. 4 450 E. Temple Street, LA 90012	1.1	9	Assessment Engine, Paramedic Rescue Ambulance, EMS Battalion Captain and BLS Rescue Ambulance
Fire Station No. 9 430 E. 7th Street, LA 90014	1.1	12	Assessment Engine, Assessment Truck and BLS Rescue Ambulance
Fire Station No. 17 1601 S. Santa Fe Ave., LA 90021	1.6	8	Engine, Paramedic Rescue Ambulance, Foam Tender, Haz-Mat Tender and Arson Investigation Unit
Fire Station No. 3 108 N. Fremont Ave., LA 90012	1.8	16	Engine, Truck, Task Force, Paramedic Rescue Ambulance, BLS Rescue Ambulance, Emergency Lighting Unit, Command Post Vehicle, Medical Supply Trailer and Back-up US&R Apparatus
Fire Station No. 10 1335 S. Olive Street LA 90015	2.8	14	Engine, Truck, Paramedic Rescue Ambulance, BLS Rescue Ambulance and Assessment Light Force

*Source: LAFD, Written correspondence with Kristin Crowley, Fire Marshall, LAFD June 11, 2018, **Appendix K** of this Draft EIR.*

[15] Los Angeles Fire Department, Our Mission, https://www.lafd.org/about/about-lafd/our-mission. Accessed August 22, 2022.
[16] Los Angeles Fire Department, Our Mission, https://www.lafd.org/about/about-lafd/our-mission. Accessed August 22, 2022.
[17] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.
[18] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.



Fire Station No. 17: 1601 S. Santa Fe Avenue
Fire Station No. 9: 430 E. 7th Street
Fire Station No. 4: 450 E. Temple Street
Fire Station No. 25: 2927 Whittier Boulevard
Fire Station No. 2: 1962 Cesar Chavez Avenue

Source: Los Angeles Fire Department, April 2019.

Figure IV.J.1-1
Fire Station Location Map

The two stations located within two miles, but beyond the 1.5-mile maximum response distance for truck companies, are Station No. 17 and Station No. 3. Fire Station No. 17 located at 1601 S. Santa Fe Avenue, is approximately 1.6-miles south of the Project Site.[19] Fire Station No. 17 has eight members, a paramedic rescue ambulance, foam tender, haz-mat tender and arson investigation Unit.[20] Fire Station No. 3 is located at 108 N. Freemont, approximately 1.8 miles northwest of the Project Site and serves as the Central Bureau Division Headquarters. There are 16 members, and the equipment includes a task force, paramedic rescue ambulance, BLS rescue ambulance, emergency lighting unit, command post vehicle, medical supply trailer and back-up US&R Apparatus.[21]

The station farthest from the Project Site is Station No. 10, located at 1335 S. Olive Street, approximately 2.8 miles west of the Project Site. There are 14 members and the equipment includes a paramedic rescue ambulance, BLS rescue ambulance and assessment light force.[22]

The Safety Element designates specific arterials as selected disaster routes. Disaster routes are freeway, highway or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. The nearest selected disaster route to the Project Site is Alameda Street, located 0.4 mile west of the Project Site.[23]

(2) Response Distance and Times

According to the LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. The Fire Code specifies maximum response distances allowed between specific locations and engine/truck companies, based on land uses and fire flow requirements. As previously identified, pursuant to LAMC Section 57.507.3.3, the maximum response distance between Industrial and Commercial land uses (as the LAFD has classified the Project's mix of uses) to a fire station that houses an engine company is one-mile and the maximum response distance to a fire station that houses a truck company is 1.5 miles (both the engine and truck company requirements apply to the Project).[24] The Project Site is not located within one mile of

[19] Los Angeles Fire Department website https://www.lafd.org/fire-stations/station-results, Accessed August 22, 2022.

[20] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.

[21] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.

[22] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.

[23] Los Angeles City Department of Planning, Safety Element, Exhibit H, December 1990, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed August 22, 2022.

[24] Pursuant to LAMC Section 57.507.3.3, the maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied.

either a truck or engine company. However, as identified above the Project Site is located approximately 1.1 miles from Fire Station No. 9 which houses both a truck and engine company.

Based on the criteria of response distance from existing fire stations, the LAFD has determined that fire protection would be inadequate. However, as previously discussed, LAMC Section 57.512.1 states that where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. Currently, there are no immediate plans to increase LAFD staffing or resources for Stations 3, 4, 9, 10, or 17, which will serve the Project Site.[25]

The LAFD utilizes several factors in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

(3) Fire Flow

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for fire flow to the Project Site. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR shows six nearby hydrants flowing simultaneously for a combined 8,326 gpm at 20 psi. As shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3 of the LAMC.[26]

The Project Site is less than 80,000 square feet and there is one hydrant at the southeast corner of Seaton Street and 5th Street, as well as one halfway down the block on the east side of Seaton. There are two additional fire hydrants on the west side of Colyton Street in the immediate vicinity of the Project Site. Additionally, there are several hydrants on Palmetto Street (at least one per block) to the south of the Project Site, as well as several on 5th Street, Seaton Street and Colyton Street. Multiple additional fire hydrants are located in the greater vicinity of the Project Site.[27] The hydrants currently serving the Project Site comply with LAMC Section 57.507.3.2.

---

[25] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.

[26] 1100 E. 5th Street Mixed-Use Project Utility Infrastructure Technical Report: Water, Exhibit 2, prepared by KPFF, October 19, 2020, **Appendix N.1** of this Draft EIR.

[27] City of Los Angeles Geo Hub, fire hydrant locations, https://www.arcgis.com/apps/webappviewer/index.html?id=ba0b630c929d4302b58eb2f65c2c6536. Accessed August 22, 2022.

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

Threshold (a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

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

(1) Fire Protection

- *Require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.*

b) Methodology

In accordance with standard LAFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, hydrant and access improvements, and review by the LAFD of a project's emergency features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities. As previously mentioned, the LAFD does not solely determine the adequacy of fire protection based on response times or number of emergency medical services (EMS) or fire-related incidents. Beyond the standards included in the Fire Code, consideration is given to the size of the Project, uses proposed, fire-flow necessary to accommodate the Project, response time, distance for engine and truck companies (the distance criteria is one mile for an engine company and 1.5 miles for a truck company), fire hydrant sizing and placement standards, access, and the Project's potential to use or store hazardous materials. Based on these factors, a determination is made as to whether the LAFD would require a new or physically altered facility to maintain acceptable service ratios the construction of which could result in a potentially significant environmental impact.

It is important to note that consistent with *City of Hayward v. Trustees of the California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on

public safety *services* are not an environmental impact that CEQA requires a project applicant to mitigate: "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII, § 35, subd. (a)(2) ["The protection of the 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."].)" (Id. at p. 843) Thus, the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate. Therefore, the need for, or deficiency in, adequate fire protection and emergency medical services in and of itself is not a CEQA impact, but rather a social and/or economic impact.[28] Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection and emergency medical services from a project is determined by whether construction of new or expanded fire protection and emergency medical facilities is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire and emergency facilities, that in the event the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332.

c) Project Design Features

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to fire protection service. No specific project design features are proposed with regard to fire protection service.

As discussed, in **Section IV.K, Transportation**, of this Draft EIR, pursuant to PDF TR-1, the Project Applicant would implement a Construction Management Plan that would include provisions for maintaining safety and access to the Project Site during construction.

d) Analysis of Project Impacts

As compared to the Project, the 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 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and a decrease in the number of bicycle spaces from 180 to 179. The overall building parameters would remain unchanged and the design, configuration, and operation of the

[28] City of Hayward v. Board Trustee of California State University (2015) 242 Cal, App. 4th 833, 847, https://caselaw.findlaw.com/ca-court-of-appeal/1719667.html. Accessed August 22, 2022.

Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, 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 result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?***

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, substantial adverse physical impacts associated with the provision of new or physically altered fire facilities would be essentially the same. Therefore, 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

(a) Construction

Construction on the Project Site would increase the potential for accidental fires from such sources as mechanical equipment and flammable construction materials. As previously shown in **Table IV.J.1-3**, the Project Site is expected to continue to be served by Fire Station Nos. 4 (located 1.1 miles from the Project Site) and 9 (located 1.1 miles from the Project Site). In addition, Fire Station No. 17 and Fire Station No. 3 would continue to be available to serve the Project Site as necessary.

The implementation of "good housekeeping" procedures by the construction contractors and the work crews would minimize these hazards. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the Regional Water Quality Control Board (RWQCB), which would ensure that wastes generated during the construction process are disposed of properly. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD (see 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 (see PDF TR-1 in **Section IV.K, Transportation,** of this Draft EIR); and

- The Project would be required to prepare a Construction Management Plan (see PDF TR-1 in **Section IV.K, Transportation,** of this Draft EIR) that would address traffic and access control during construction.

Overall, upon implementation of the Project Design Feature, construction-related impacts would be minimized. PDF TR-1 would lessen the potential impacts to LAFD during construction and construction would not generate a demand for additional fire protection services that would substantially exceed the capability of the LAFD to serve the Project Site. 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, which are typically financed through the City general funds.[29] Moreover, construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services. **Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAFD's capability to serve the Project Site; accordingly, the Project and Flexibility Option would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on fire protection services during Project and Flexibility Option construction would be less than significant.**

(b) Operation

The following discussion considers the LAFD's primary criteria for determining the Project's impacts on fire protection services, including fire flows, response distance, and LAFD review of hydrants and access.

(i) Facilities and Equipment

The Project Site is currently developed with three vacant warehouses and a surface parking lot. The Project involves removal of the existing uses and construction of a mixed-use structure with live/work units and commercial uses and three subterranean parking levels. As discussed in **Section IV.I, Population and Housing,** of this Draft EIR, the Project would be expected to generate new residents. Operation of the Project's commercial uses would generate new full- and part-time jobs. Because it would increase the residential service population and the amount and scale of structural development on-site, the Project would increase the Project Site's demand for LAFD fire protection.

[29] City of Hayward v. Board Trustee of California State University (2015) 242 Cal, App. 4th 833, 847, https://caselaw.findlaw.com/ca-court-of-appeal/1719667.html. Accessed August 22, 2022.

The Project Site is expected to continue to be served by Fire Station Nos. 4 and 9. In addition, Fire Station Nos. 17, 3, and 10, would continue to be available to serve the Project Site as necessary. The Project would not be within the Fire Code's maximum one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company for land uses within the Industrial and Commercial category, which the LAFD has determined is applicable to the Project. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). The Project Site is located approximately 1.1-miles from Fire Station No. 4 and 9; therefore, the Project Site is not located within the LAMC maximum response distance for both commercial and industrial land uses. However, as the response time for non-EMS and EMS calls at Fire Station Nos. 4 and 9 are within 6 minutes and the travel time is faster than the Citywide average, the Project Site is adequately served by existing fire protection services. Fire Station No. 3 and Fire Station No. 17 are also within 6 minutes and the travel time is faster than the Citywide average.[30] As identified above, the LAFD determined, based on response distance from existing stations, fire protection would be considered inadequate.[31] Therefore, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems). Regardless, as previously stated, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety *services* are not an environmental impact that CEQA requires a project applicant to mitigate.

The Project would implement City Building and Fire Code requirements regarding Project components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with these requirements would be demonstrated as part of a plot plan that would be submitted to LAFD for review and approval prior to issuance of a building permit in accordance with City regulations. 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 Section 57.118 of the LAMC, prior to the issuance of a building permit. The Project would be equipped with the following safety features as required by the Fire Code:

- Building Design: Fire resistant doors and materials, as well as walkways, wider stairwells and elevator systems (including emergency and fire control elevators with communication systems inside) that meet code requirements (Division 7 of the Fire Code).

- Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation; as well as

[30] City of Los Angeles Fire Department, Fire Stat LA, https://www.lafd.org/fsla/stations-map. Accessed August 22, 2022.

[31] Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated June 11, 2018. Refer to **Appendix K** of this Draft EIR.

a fire alarm system, building emergency communication system, and a state of the art smoke control system (Division 9 of the Fire Code).

- Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with LAMC Section 57.409. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish on on-site Emergency Assistance Center; and establish procedures to be followed during an emergency incident. There would also be provision of on-site emergency equipment and emergency training for personnel to reduce the impacts on the need for emergency medical services. The Emergency Plan would be subject to the approval of the LAFD (Section 408.3 of the Fire Code).

- LAFD Access: Access for LAFD apparatus and personnel to the Project Site would be in accordance with LAFD requirements (Chapter 10 of the Fire Code)

As such, compliance with applicable regulatory requirements that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. With incorporation of applicable LAMC fire safety requirements, including those established in the Building Code, the Fire Code, and Table 57.507.3.1 of the LAMC (regarding fire flow requirements), along with the fact that the LAFD has no known or proposed plans to expand their fire protection facilities within the Arts District area at this time, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of Station Nos. 4 and 9 to serve the Project such that it would require construction of new fire facilities.[32]

(c) Fire Flows

In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). As previously identified, pursuant to Fire Code Section 57.09.06 of the LAMC, hydrants in high-density industrial and commercial locations, such as the Project Site, must serve a net land area of 80,000 square feet. Additionally, there must be a distance of 300 feet between hydrants on roads and fire lanes and 2.5-inch by 4.0-inch double fire hydrants must be used. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm of water is flowing.[33] The minimum fire flow requirement for the Project based on correspondence with LAFD, which classifies the Project within the Industrial and Commercial land use category would be at least 6,000 to 9,000 gpm flowing from four to six hydrants at the same time.[34] A minimum residual water pressure of 20 pounds PSI is to remain in the water system

[32] Written Response from Kristin Crowley, Fire Marshal, Los Angeles Fire Department, June 11, 2018. **Appendix K,** of this Draft EIR.

[33] Written Response from Kristin Crowley, Fire Marshal, Los Angeles Fire Department, June 11, 2018. Refer to **Appendix K** of this Draft EIR.

[34] Written Response from Kristin Crowley, Fire Marshal, Los Angeles Fire Department, June 11, 2018. **Appendix K**, of this Draft EIR.

while the required gpm of water is flowing. This translates to a required flow of 1,500 gpm for each hydrant.[35] An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR shows six nearby hydrants flowing simultaneously for a combined 8,326 gpm at greater than 20 psi. As shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3 of the LAMC.[36] The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Project Site.

(d) Emergency Access

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including 5th Street and Seaton Street. Pedestrian access to the Project's various components would be provided from 5th Street and Seaton Street via paseos into the Project and building entrances oriented along these streets. The ground-floor commercial uses would consist of several establishments, each with its own entrance directly from the street, pedestrian plaza, or paseo. Pedestrian access to the commercial spaces on the second level would be accessible via stairs and elevators in the Project's commercial lobby in the paseo at Seaton Street. Pedestrian access to the live/work component would also be accessible from 5th Street and Seaton Street, with 5th Street providing access to the primary live/work lobby. Vehicle access into the shared parking garage for the commercial and live/work uses would be available from Seaton Street to the three subterranean levels of the parking garage. Travel lanes would be maintained in each direction throughout the operation of the Project, and emergency access would not be impeded, including Alameda Street, which the Safety Element designates as a selected disaster route.[37] Furthermore, pursuant to California Vehicle Code Section 21806, emergency vehicles have priority on streets with sirens, options to avoid traffic with sirens, and drive in opposing traffic lanes.[38] Therefore, the increases in traffic from the Project would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic.

All ingress and egress access points that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times. Furthermore, the Project would comply with all state and local building codes relative to fire protection, safety, and suppression, including those

---

35 Written Response from Kristin Crowley, Fire Marshal, Los Angeles Fire Department, June 11, 2018. Refer to **Appendix K** of this Draft EIR.

36 1100 E. 5th Street Mixed-Use Project Utility Infrastructure Technical Report: Water, Exhibit 2, prepared by KPFF, October 19, 2020, **Appendix N.1** of this Draft EIR.

37 Los Angeles City Department of Planning, Safety Element, Exhibit H, December 1990, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed August 22, 2022.

38 California Vehicle Code, Section 21806, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=VEH&sectionNum=21806. Accessed August 22, 2022.

standards and requirements as set forth by Title 24 of the California Code of Regulations, the Safety Element, and the Fire Code.

In addition, upon completion of the Project and pursuant to LAMC Section 57.106.5.2, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate LAFD response to the Project Site.

Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not anticipated or needed to maintain service and, therefore, the potential for physical impacts associated with construction of fire facilities would be less than significant; no mitigation measures would be required.

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to fire protection facilities, would be less than significant; no mitigation measures would be required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to fire protection facilities, would be less than significant without mitigation.

4. Cumulative Impacts

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

a) Impact Analysis

The geographic scope of the cumulative fire protection analysis encompasses the service area for the LAFD in general, and Fire Station No. 4 and No. 9, in particular. It is anticipated that the additional population and commercial activity would increase the demand for fire protection in the service areas for LAFD Fire Stations in the downtown area. The Project, in combination with the construction and operation of the Related Projects located within the service areas of these stations, would result in additional residential and commercial land uses within these service areas.

In addition, the Draft Central City Community Plan Update, known as the DTLA 2040 Plan, has been released by the Department of City Planning. According to the DTLA 2040 Plan projections, approximately 125,000 people, 70,000 housing units, and 55,000 jobs would be added to the

Downtown area by the year 2040.[39] Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is anticipated to be completed by 2023, well before the Community Plan Update's horizon year. Moreover, the Project's projected buildout year is similar to those of many related projects. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption (as some of the related projects may not be built out by 2023), would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

The increase in development and residential service population from the Project and Related Projects would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the Related Projects would be reviewed on a project-by-project basis by the LAFD to ensure compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services. Project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD, are expected to help support adequate response times. Each of the Related Projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations.

In addition, each Related Project would also be subject to the City's routine 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. If Project construction were to occur concurrently with the construction of Related Project Numbers 2 and 5, which are all located within approximately 500 feet of the Project Site, then specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan (pursuant to PDF TR-1, in **Section IV.K, Transportation**, of this Draft EIR) which would include provisions for maintaining safety and emergency access to the adjacent rights-of-way during construction.

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, such as Fire Station No. 4 (approximately 1.6 acres in size currently) and Fire Station No. 9 (approximately 0.3 acres in size currently), or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, 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 or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location, would be

[39] Growth projections per the City of Los Angeles, DTLA 2040, About This Project, https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update#about. Accessed August 22, 2022.

speculative and beyond the scope of this document. As such, cumulative impacts on fire protection and emergency medical services would be less than significant.

Since the impact of the Project on its own would be less than significant, and since PDF TR-1 would require coordination with nearby construction projects, and since all Related Projects will be required to comply with the Building and Fire Codes, the Project would not contribute to a cumulatively significant impact on fire protection services. **Based on the above analysis, the Project and Flexibility Option's contribution to cumulative impacts on fire protection would not be cumulatively considerable, and cumulative impacts would be less than significant.**

b) Mitigation Measures

Cumulative impacts related to fire protection for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to fire protection for both the Project and Flexibility Option were determined to be less than significant without mitigation.