

IV. Environmental Impact Analysis

O. Wildfire

1. Introduction

This section of the Draft EIR analyzes the Project's potential impacts related to wildfires. Specifically, the analysis describes the risk of wildfire and wildfire-related hazards at the Project Site, as well as the potential for the Project to increase the risk of wildfire and wildfire-related hazards in the area. This section also identifies mitigation measures intended to address any potential significant impacts. In addition, this section evaluates the Project's potential incremental contribution to cumulative wildfire risk resulting from past, present, and probable future projects in the Project vicinity. The analysis uses Fire Hazard Severity Zone Maps published by CalFire and maps of the City's Very High Fire Hazard Severity Zones.

2. Environmental Setting

a) Regulatory Framework

Policies, requirements, and guidelines related to wildfire have been established at the federal, state, and local levels. Potentially applicable regulations and plans include the following:

- National Cohesive Wildland Fire Management Strategy
- Federal Wildland Fire Management Policy
- National Fire Plan
- National Fire Protection Association Codes, Standards, Practices, and Guides
- California Fire Code & California Building Code
- California Department of Forestry and Fire Protection
 - California Code of Regulations: Title 24 Division 1.5
 - Fire Hazard Severity Zones
 - State Responsibility Area Maps
- Executive Order N-05-19
- Senate and Assembly Bills: SB 209, SB 901, and AB 1054
- California Strategic Fire Plan
- Local Responsibility Area Maps
- Los Angeles County Fire Department 2017-2021 Strategic Plan: Act, Action, and Accomplish, and Los Angeles County Disaster Routes
- City of Los Angeles LAFD Strategic Plan 2018-2020: A Safer City 2.0
- City of Los Angeles Emergency Operations Plan: Brush Fire Hazard Specific Annex
- Los Angeles Municipal Code: Fire Code
- City of Los Angeles General Plan Framework: Safety Element

(1) Federal

(a) *National Cohesive Wildland Fire Management Strategy*

The U.S. Forest Service (USFS), in coordination with other federal, tribal, state, and local partners/agencies developed the National Cohesive Wildland Fire Management Strategy (The National Strategy), which has three key components: Resilient Landscapes, Fire Adapted Communities, and Safe and Effective Wildfire Response.¹

Resilient Landscapes addresses the need for sustainable and resistant landscapes, specific to a local region's environment, to aid in recovery from wildfires. In the National Cohesive Wildland Fire Management Strategy (April 2014), Landscape Classes are identified to help inform potential management options and/or policies to maintain fire prone landscaped areas that are specific to a particular region. Fire Adapted Communities would account for a community's ability to prepare for, respond to, and recover from a wildfire. Safe and Effective Wildfire Response addresses enhancing wildfire response preparedness, while emphasizing structural protection and wildfire prevention. The National Strategy provides various actions and activities that can be implemented at the national, regional, and local levels to achieve reduced wildfire threats to landscapes, communities, the public, and emergency responders.

All of Los Angeles County is within Landscape Class A, *Urban Developed Built*, which is identified to have a high percent of forested area, a moderate area burned (2002-2011), a moderate historical fire frequency, a moderate index of prescribed fire activity, a moderate federal ownership, a very high average of urban value, a low natural landscape percentage, and a moderate natural-mixed landscape percentage.²

(b) *Federal Wildland Fire Management Policy*

The Federal Wildland Fire Management Policy was developed in 1995 and updated in 2009³ by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. The Federal Wildland Fire Management Policy provides policy direction to state and local agencies for the safety of emergency responders and the public during wildfire events, activities for the purposes of fire management (i.e. vegetation maintenance) and ecosystem sustainability, responding to wildfires, protection of life and community infrastructure, and measures to prevent wildfire events.

(c) *National Fire Plan*

The National Fire Plan was a Presidential directive in 2000 as a response to severe wildland fires throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural

¹ United States Forest Service National Cohesive Wildland Fire Management Strategy, The National Strategy, April 2014.

² United States Forest Service National Cohesive Wildland Fire Management Strategy, The National Strategy, April 2014, Page 17.

³ Federal Wildland Fire Management Policy, Guidance for Implementation of Federal Wildland Fire Management Policy, February 2009.

communities and ensuring sufficient fire-fighting capacity in the future. The plan addresses five key points: Firefighting, Rehabilitation, Hazardous Fuels Reduction, Community Assistance, and Accountability. The plan provides technical, financial, and resource guidance and support for wildland fire management across the United States. The U.S. Forest Service and the Department of the Interior work to implement the key points outlined in the plan.

These five key points would address and focus on needs such as preparing for wildfires, the capacity to take prompt action when responding to wildfires; restoration, rehabilitation, and protection of communities after a wildfire occurs; potential programs that would help with reducing the risk of wildfires, including continued management from of wildfire fuel sources, potential hazard mitigation, and restoration of ecosystems; working directly with communities for adequate planning and action to increase protections for people and property; and providing for continued accessible information regarding the goals of the National Fire Plan.⁴

(d) *National Fire Protection Association Codes, Standards, Practices, and Guides*

The National Fire Protection Association (NFPA) develops codes, standards, recommended practices, and guides through a consensus standards development process approved by the American National Standards Institute (ANSI). The consensus standards development process brings together various professionals to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or codes, unless adopted or referenced as such by the California Fire Code or Local Fire Agency. Typical standards would include: Standard for Portable Fire Extinguishers, Standards for Installation of Sprinkler Systems, National Electrical Code, National Fire Alarm and Signaling Code, Standards for Fire Doors and Other Opening Protectives, Life Safety Code, as well as a number of other standards and codes specific to a building's use and/or occupancy.

(2) State

(a) *California Fire Code & California Building Code*

The California Fire Code (CFC), Chapter 9 of Title 24 of the California Code of Regulations (CCR), was created by the California Building Standards Commission based on the International Fire code and is updated every three years. The overall purpose of the CFC is to establish the minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the CFC contains minimum standards for development in the wildland–urban interface and fire hazard areas. The CFC also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards.

⁴ U.S. Department of the Interior and USDA Forest Service, *Managing the Impact of Wildfires on Communities and the Environment*, September 2000.

Chapter 7A of the California Building Code (CBC) regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a wildland-urban interface fire area. This chapter establishes minimum standards for the protection of life and property by increasing the ability of a building located in any Fire Hazard Severity Zone within State Responsibility Areas or a wildland-urban interface fire area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. New buildings located in such areas are required to comply with the ignition resistant construction standards outlined in Chapter 7A.

The CFC also regulates the use, handling, and storage of hazardous materials at fixed facilities. The CFC and the California Building Code use a hazards classification system to determine what protective measures are required to protect life and property. The CFC uses a permit system based on hazard classification to ensure that these safety measures are met.

(b) California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is tasked with reducing wildfire-related impacts, enhancing California's resources, and conducting emergency response. CAL FIRE is also responsible for the protection of approximately 31 million acres of state responsibility area (SRA) consisting of privately-owned wildlands along with administration of private and public forests within the state. At the local level, CAL FIRE provides a variety of services including serving via contract as fire department staff for jurisdictions throughout California. CAL FIRE is responsible for enforcing State of California fire safety codes included in the CCR and California Public Resources Code throughout the SRA. Public Resources Code 4291 generally states that any person operating any structure located on brush-covered lands or land covered with flammable materials is required to maintain defensible space around the structure, regardless of whether it is in or adjacent to SRA. CCR Title 14 Section 1254 identifies minimum clearance requirements around utility poles.

CAL FIRE also inspects utility facilities and makes recommendations regarding improvements in facility design and infrastructure. CAL FIRE recommends a joint inspection between the utility owner and CAL FIRE so that each entity may assess the current state of the facility, to successfully implement fire prevention techniques and policies. Violations of state fire codes discovered during the inspections are required to be brought into compliance with the established codes. If a CAL FIRE investigation reveals that a wildfire occurred as a result of a violation of a law or negligence, the responsible party could face criminal and/or misdemeanor charges. In cases where a violation of a law or negligence has occurred, CAL FIRE has established the Civil Cost Recovery program, which requires parties liable for wildfires to pay for wildfire-related damages.

(i) California Code of Regulations: Title 24 Division 1.5

Title 14 of the CCR, Division 1.5, establishes the regulations for CAL FIRE and is applicable in all SRAs where CAL FIRE is responsible for wildfire protection. SRAs within the City of Los Angeles may include small portions along the eastern edge of Simi Hills, the south eastern edge of the Santa Susana Mountains, and the south western edge of the San Gabriel Mountains, where these

mountain ranges meet the City of Los Angeles boundaries. Title 14 of the CCR, Section 1270, et seq., establishes minimum standards for emergency access, fuel modification, setback to property lines, signage, and water supply.

(ii) *Fire Hazard Severity Zones*

CAL FIRE uses Fire Hazard Severity Zones⁵ (FHSZs) to classify the anticipated fire-related hazard for SRAs. The classifications include Non-Wildland Non-Urban, Moderate, High, and Very High. These fire hazard measurements account for vegetation, topography, weather, crown fire production, and ember production and movement.⁶

(iii) *State Responsibility Area Maps*

CAL FIRE adopted Fire Hazard Severity Zone maps for State Responsibility Areas in November 2007. The maps and related regulations were approved by the Office of Administrative Law. Government Code Section 51179 states the following:

“A local agency shall designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the director pursuant to subdivisions (b) and (c) of Section 51178. A local agency shall be exempt from this requirement if ordinances of the local agency, adopted on or before December 31, 1992, impose standards that are equivalent to, or more restrictive than, the standards imposed by this chapter.”

(c) *Executive Order N-05-19⁷*

Due to the severe wildfires that California experienced in 2018, the Governor signed Executive Order N-05-19, directing CAL FIRE, in consultation with other State agencies and departments, to provide a written report with recommendations necessary to mitigate and prevent wildfires. The report includes recommendations for immediate, medium-term, and long-term actions to prevent the impacts of destructive and deadly wildfires. CAL FIRE completed this report on February 22, 2019.⁸

The Community Wildfire Prevention & Mitigation Report identifies priority projects that can be immediately implemented to help protect the most vulnerable communities, as well as broader solutions for state government to consider in the immediate, near, and longer terms. Immediate actions that would be taken include addressing priority fuel reduction and treatment projects

⁵ CAL FIRE, Office of the State Fire Marshal, Fire Severity Zone Maps, <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>, accessed August 24, 2022.

⁶ CAL FIRE, Office of the State Fire Marshal, State of California Fire Hazard Severity Zones In State Responsibility Areas, November 7, 2007, <https://www.arcgis.com/home/webmap/viewer.html?webmap=ab80ffe0a139445d8f16a06178720b2b>, accessed August 24, 2022.

⁷ State of California, Executive Department, Executive Order N-05-19.

⁸ State of California, California Department of Forestry and Fire Protection, Community Wildfire Prevention & Mitigation Report.

throughout the state, addressing the housing needs of staff needed for completing this work, and assessing funding, personnel, and administrative needs to maximize the workforce effectiveness, as well as aligning community education campaigns across state and local entities. Medium-term actions would include: execute State Agency MOU for fuels reduction, identify options for retrofitting homes to new wildland urban interface standards, create incentives for fuels reduction on private lands, continue to develop the methodology to assess communities at risk, jumpstart the workforce development for forestry and fuels work, develop mobile data collection tool(s) for project reporting, coordinate with air quality regulators to enable increased use of prescribed fire, and develop technology tools to enable real time prescribed fire information sharing. Long-term actions include certifying the California Vegetation Treatment Program Environmental Impact Report, developing a scientific research plan regarding management and mitigation with funding recommendations, providing technical assistance to local governments to enhance or enable fire hazard planning, updating codes governing defensible space and forest and rangeland protections, and requesting the Board of Forestry and Fire Protection review the Forest Practice Act and Rules and make recommendations on changes needed to restore forest health.⁹

(d) *Senate and Assembly Bills*

(i) *Senate Bill 209: Wildfire Forecast and Threat Intelligence Integration Center*

Senate Bill 209 was approved by the Governor on October 2, 2019, establishing the Wildfire Forecast and Threat Intelligence Integration Center which is composed of representatives from specified state and other entities. This bill requires the center to serve as the state's integrated central organizing hub for wildfire forecasting, weather information, and threat intelligence gathering, analysis, and dissemination and to coordinate wildfire threat intelligence and data sharing, as provided. The bill also requires the center to, among other things, develop a statewide wildfire forecast and threat intelligence strategy, as provided, and protect and safeguard sensitive information.¹⁰

(ii) *Senate Bill 901*

The Budget Act of 2018 appropriated \$99,376,000 to the Office of Emergency Services for the purposes of local assistance. Senate Bill (SB) 901, approved by the Governor on September 21, 2018, revises the Budget Act of 2018, allowing for \$25,000,000 of those appropriated funds to be applied to support activities directly related to regional response and readiness. Such activities related to regional response and readiness would include pre-deployment of Office of Emergency Services fire and rescue, and local government resources that are part of the California Fire and Rescue Mutual Aid System or additional resources upon the authority and approval of the Office

⁹ State of California, California Department of Forestry and Fire Protection, Community Wildfire Prevention & Mitigation Report, page 8.

¹⁰ California Senate Bill 209, 2019.

of Emergency Services to meet the requirements for state resources called up for pre-disaster and disaster response.¹¹

(iii) *Assembly Bill 1054*

Assembly Bill (AB) 1054, approved by the Governor on July 12, 2019, establishes the California Wildfire Safety Advisory Board, which consists of seven members appointed by the Governor, Speaker of the Assembly, and Senate Committee on Rules. The Board is required to advise and make recommendations related to wildfire safety to the Wildfire Safety Division, or on and after July 1, 2021, to the Office of Energy and Infrastructure Safety, which was established by AB 111 or SB 111 of the 2019-20 Regular Session.¹²

(e) *California Strategic Fire Plan*

In January 2019, CAL FIRE released the 2019 California Strategic Fire Plan (Strategic Plan).¹³ This plan outlines CAL FIRE's Mission, Vision, Values, and Goals. Under these three elements The Strategic Plan focuses on four primary goals: 1) Improve our core capabilities, 2) Enhance internal operations, 3) Ensure health and safety, and 4) Build an engaged, motivated, and innovative workforce. Goal 1 includes emergency response, natural resources protection, prevention, and regulatory oversight. Goal 2 includes continuous review and evaluation of internal core operations to find ways to streamline and maximize CAL FIRE's effectiveness. Goal 3 addresses the continued health and safety of CAL FIRE's workforce. Goal 4 addresses continued recruitment, training, and retention of the CAL FIRE workforce. Also included in the Strategic Plan are objectives to meet each of the four goals, as well as how successful implementation of the Strategic Plan is measured.

(3) Local

(a) *Local Responsibility Area Maps*

Government Code 51175-51189 directs CAL FIRE to identify areas of very high fire hazard severity zones within Local Responsibility Areas¹⁴ (LRA). These areas are referred to as Very High Fire Hazard Severity Zones (VHFHSZ). VHFHSZs are based on data and models of potential fuels over a 30-to-50-year time horizon, their associated expected fire behavior, and expected burn probabilities, which are used to quantify the likelihood and nature of vegetation fire exposure to buildings. In late 2005, the California Building Commission adopted California Building Code Chapter 7A, which became effective in 2008 and requires new buildings in VHFHSZs to use ignition resistant construction methods and materials. These new codes include provisions to improve the ignition resistance of buildings, especially from firebrands. VHFHSZs are used by building officials for new building permits in LRAs.¹⁵ The zones are also used to identify property

¹¹ California Senate Bill 901, 2018.

¹² California Assembly Bill 1054, 2019.

¹³ CAL FIRE, California Strategic Fire Plan, January 2019.

¹⁴ CAL FIRE, Office of the State Fire Marshal, Los Angeles Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE.

¹⁵ City of Los Angeles, Los Angeles Fire Department, Very High Fire Hazard Severity Zone Map.

whose owners must comply with natural hazards disclosure requirements at the time of property sale and 100-foot defensible space clearance requirements.

(b) *Los Angeles County Fire Department 2017-2021 Strategic Plan: Act, Action, and Accomplish, and Los Angeles County Disaster Routes*

The Los Angeles County Fire Department provides fire protection services to the county's 59 cities, as well as unincorporated county areas. The 2017-2021 County Strategic Plan is broken down into 3 main goals: Goal 1) Emergency Operations, Goal 2) Public Service, and Goal 3) Organizational Effectiveness. Emergency Operations works to address societal challenges through non-traditional service delivery; Public Services addresses catastrophic preparedness and community initiatives; and Organizational Effectiveness addresses current and future department needs (staffing, training, equipment, facilities, information technology, etc.).¹⁶

Los Angeles County Disaster routes are freeways, highways, or arterial routes that are pre-identified for use to bring in emergency personnel, equipment, and supplies to an affected area at the time of a disaster or emergency.¹⁷

(c) *Los Angeles Fire Department Strategic 2018-2020 Plan: A Safer City 2.0*

A Safer City 2.0¹⁸ has four areas of focus that align with the Mayor's priority outcomes: A Safe City, A Well Run City Government, A Livable and Sustainable City, and A Prosperous City. Within these focus areas are five goals: Goal 1) Provide exceptional public safety and emergency service; Goal 2) Embrace a healthy, safe and productive work environment; Goal 3) Implement and capitalize on advanced technology; Goal 4) Enhance LAFD sustainability and community resilience; and Goal 5) Increase opportunities for personal growth and professional development. Each of these goals include a number of strategies aimed at providing communities and the public with fire protection, emergency medical services, preservation of life and property, and promoting public safety.

(d) *City of Los Angeles Emergency Operations Plan: Brush Fire Hazard Specific Annex*

The Emergency Management Department (EMD) leads the City's effort in the development of citywide emergency plans, revises and distributes the Emergency Operations Master Plan and Master Procedures and Annexes and updates and disseminates guidelines for the emergency response and recovery plans. The department also reviews and tests departmental emergency plans to ensure City departments are ready to fulfill their respective emergency missions. The

¹⁶ Los Angeles County Fire Department, 2017-2021 Strategic Plan: "Act, Action, Accomplish," June 21, 2018.

¹⁷ Los Angeles County Operational Area, Disaster Routes and maps. <https://dpw.lacounty.gov/dsg/DisasterRoutes/>, accessed August 24, 2022.

¹⁸ City of Los Angeles, Los Angeles Fire Department, Strategic Plan 2018-2020: A Safer City 2.0.

Brush Fire Hazard Specific Annex¹⁹ was developed in cooperation and with input from the City departments with primary response/support activities, as well as input from appropriate non-City agencies with identified activities related to brush fire emergencies, and is reviewed every other year. This Annex details the City's responsibilities for response to brush fires. It identifies roles and responsibilities for appropriate departments, procedures for rapid notification to City departments and the public in the event of brush fire related emergencies, and ensures consistency with federal, state, county, and other local governments' emergency response plans and operations.

(e) *Los Angeles Municipal Code: Fire Code*

The City of Los Angeles Fire Code, Article 7, Chapter V of the Los Angeles Municipal Code (LAMC), consists of the California Fire Code with Los Angeles–specific amendments that are further restrictive. The Fire Code establishes the minimum requirements consistent with nationally recognized good practices for providing a reasonable level of life safety and property protection for the hazards of fire, explosion, panic, or dangerous conditions in new and existing buildings, structures, or premises. The Fire Code also establishes requirements to provide a reasonable level of safety to firefighters and emergency responders during emergency operations.²⁰

(f) *City of Los Angeles General Plan: Safety Element*

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 26, 1996, provides a broad framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. Included in the Safety Element are goals, objectives, policies, and programs, as well as a map of Selected Wildfire Hazard Areas within the City of Los Angeles.²¹ The programs outlined are those of the City Emergency Operations Organization (EEO), the city agency/program that implements the Safety Element. In addition, the Safety Element also designates disaster routes.²²

Safety Element	
Goal 1	A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water related hazard, seismic event, geologic conditions, or release of hazardous materials disasters is minimized.
Objective 1.1	Implement comprehensive hazard mitigation plans and programs that are integrated with each other and with the City's comprehensive emergency response and recovery plans and programs.
Policy 1.1.1	Coordination. Coordinate information gathering, program formulation and program implementation between City agencies, other jurisdictions and appropriate public and private entities to achieve the maximum mutual benefit with the greatest efficiency of funds and staff. [All EEO hazard mitigation programs involving cooperative efforts between entities implement this policy.]

¹⁹ City of Los Angeles, Emergency Management Department, Emergency Operations Plan, Brush Fire Hazard Specific Annex, March 2018.

²⁰ LAMC 57.101.3.

²¹ City of Los Angeles Department of City Planning, Safety Element, Exhibit D, page 53, Originally adopted November 26, 1996.

²² City of Los Angeles Department of City Planning, Safety Element, Exhibit H, page 61, Originally adopted November 26, 1996.

Safety Element	
Policy 1.1.2	Disruption reduction. Reduce, to the greatest extent feasible and within the resources available, potential critical facility, governmental functions, infrastructure, and information resource disruption due to natural disaster. [All EOO programs involving mitigation of disruption of essential infrastructure, services and governmental operations systems and prepare personnel for quickly reestablishing damaged systems implement this policy.]
Policy 1.1.5	Risk reduction. Reduce potential risk hazards due to natural disaster to the greatest extent feasible within the resources available, including provision of information and training. [All programs that incorporate current data, knowledge, and technology in revising and implementing plans (including this Safety Element), codes, standards and procedures that are designed to reduce potential hazards and risk from hazards potentially associated with natural disasters implement this policy.]
Policy 1.1.6	State and federal regulations. Assure compliance with applicable state and federal planning and development regulations, e.g., Alquist-Priolo Earthquake Fault Zoning Act, State Mapping Act and Cobey-Alquist Flood Plain Management Act. [All EOO natural hazard enforcement and implementation programs relative to non-City regulations implement this policy.]
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 2.1.1	Coordination. Coordinate program formulation and implementation between City agencies, adjacent jurisdictions, and appropriate private and public entities so as to achieve, to the greatest extent feasible and within the resources available, the maximum mutual benefit with the greatest efficiency of funds and staff. [All EOO response programs involving cooperative efforts between entities implement this policy.]
Policy 2.1.2	Health and environmental protection. Develop and implement procedures to protect the environment and public, including animal control and care, to the greatest extent feasible within the resources available, from potential health and safety hazards associated with hazard mitigation and disaster recovery efforts. [All EOO emergency response and recovery programs that mitigate environmental impacts or provide care and control of animals injured or released by an emergency situation implement this policy.]
Policy 2.1.4	Interim procedures. Develop and implement pre-disaster plans for interim evacuation, sheltering and public aid for disaster victims displaced from homes and for disrupted businesses, within the resources available. Plans should include provisions to assist businesses which provide significant services to the public and plans for reestablishment of the financial viability of the City. [All EOO response and recovery programs involving evacuation and provision of temporary services to victims of an emergency event and any planning and training related thereto implement this policy.]
Policy 2.1.5	Response. Develop, implement, and continue to improve the City's ability to respond to emergency events. [All 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.]
<i>Source: City of Los Angeles.</i>	

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.²³ 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.²⁴

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)²⁵ 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.²⁶ 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 in or near the SRA; the nearest part of the SRA is located approximately 11.7 miles to the southeast in Hellman Park, north of the

²³ 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, https://osfm.fire.ca.gov/media/5590/2018-strategic-fire-plan-approved-08_22_18.pdf, accessed August 25, 2022.

²⁴ 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, https://osfm.fire.ca.gov/media/5590/2018-strategic-fire-plan-approved-08_22_18.pdf, accessed August 25, 2022.

²⁵ 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.

²⁶ 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, https://osfm.fire.ca.gov/media/5590/2018-strategic-fire-plan-approved-08_22_18.pdf, accessed August 25, 2022.

City of Whittier.²⁷ Additionally, the Project Site is not located in or near the VHFHSZ; the nearest very high fire severity zone is located approximately 1.9 miles to the north in Elysian Park.²⁸ The Project Site is near County- and City-designated disaster routes, specifically, Alameda Street, approximately 360 feet to the west, and 4th Street, approximately 870 feet to the north.²⁹

3. Project Impacts

a) Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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:

Threshold (a): *Substantially impair an adopted emergency response plan or emergency evacuation plan; or*

Threshold (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*

Threshold (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*

Threshold (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.

²⁷ California Board of Forestry and Fire Protection, State Responsibility Area Map Viewer, https://gis.data.ca.gov/datasets/5bc422648cf045f38d10e1630fb71a71_0, accessed August 25, 2022.

²⁸ City of Los Angeles Fire Department, Fire Zone Map Viewer, <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>, accessed August 25, 2022.

²⁹ Los Angeles County Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, <https://pw.lacounty.gov/dsg/DisasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: March 17, 2021; 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, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed March 17, 2021.

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 the SRA 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

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to wildfire. No specific Project Design Features are proposed with regards to wildfire.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change a portion of 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. 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, located 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. 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

area³⁰ or downslope or downwind of the 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.

(1) Impact Analysis

See **Threshold a)** in **Section IV.M.1, Utilities and Service Systems – 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.**

³⁰ City of Los Angeles Department of City Planning, Zone Information & Map Access System, <http://zimas.lacity.org>, accessed: August 25, 2022.

(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 comply with all applicable City grading permit regulations, including completion of an Erosion Control Plan Checklist and a wet weather erosion control plan during the rainy season, that require necessary measures, plans, and inspections to reduce flows from the Project Site during construction. 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 zone³¹ 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 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.**

³¹ City of Los Angeles Department of City Planning, Zone Information & Map Access System, <http://zimas.lacity.org>, accessed: August 25, 2022.

(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 17 Related Projects, the associated increase in development and population could incrementally increase the risks of wildfire in the vicinity. However, none of the 17 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.