IV. Environmental Impact Analysis

J.1 Public Services—Fire Protection

1. Introduction

This section of the Recirculated 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 the current facilities, equipment, and staffing levels. The analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning (June 13, 2023), which is included in Appendix I of this Recirculated Draft EIR; and the Water and Sewer Infrastructure Assessment Report (Utility Report), prepared by Fuscoe Engineering (revised July 2023), which is included in Appendix J of this Recirculated Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

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

- California Constitution Article XIII, Section 35;
- California Governor's Office of Emergency Services;
- City of Los Angeles Charter;
- City of Los Angeles General Plan Framework Element;
- City of Los Angeles General Plan Safety Element;
- Community Plan;
- Los Angeles Municipal Code;
- Propositions F and Q;
- Measure J; and
- Los Angeles Fire Department Strategic Plan 2023–2026.

(1) Federal

(a) Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administration (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

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

(c) Disaster Mitigation Act of 2000

The Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 USC Sections 5121–5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for state, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Disaster Mitigation Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Disaster Mitigation Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of the Disaster Mitigation Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [AIM]) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event..

(2) State

(a) California Building Code and California Fire Code

The California Building Code (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 2022 edition of the California Building Code became effective on January 1, 2023.[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 Services and Rescue Emergency Mutual Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All 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]

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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.*

3 *Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.*

4 *Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.*

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.[5] This section of the CVC states the following:

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

(d) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051–30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–93 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. 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."

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[5] *A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.*

(e) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the Statewide mutual aid system (see discussion of Mutual Aid Agreements, above). Cal OES maintains oversight of the State's mutual aid system.

(3) Local

(a) City of Los Angeles Charter

Section 520 of the Los Angeles City Charter states that the LAFD's duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.J.1-1 on page IV.J.1-7.

Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood have the necessary level of fire protection service,

Table IV.J.1-1
Relevant General Plan Fire Protection Goals, Objectives, and Policies:
Framework Element—Chapter 9, Infrastructure and Public Services

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.

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. Other applicable goals, objectives, and policies related to fire protection are listed in Table IV.J.1-1 on page IV.J.1-7. 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

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

1.5 miles.[7] This is consistent with the specifications for response distances within the LAMC, discussed below.

(c) City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 24, 2021, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as shown in Table IV.J.1-2 on page IV.J.1-8. In addition, the City's Safety Element designates disaster routes. The nearest designated disaster routes to the Project Site are along Venice Boulevard and Lincoln Boulevard/Sepulveda Boulevard.

(d) Palms–Mar Vista–Del Rey 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 General Plan Framework Element at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to fire protection required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The Project Site is located within the Palms–Mar Vista–Del Rey Community Plan area. The Palms–Mar Vista–Del Rey Community Plan (Community Plan), adopted on September 16, 1997, and most recently amended on September 7, 2016, includes the following objective and policies that are relevant to fire protection:

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

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

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

Table IV.J.1-2
Relevant General Plan Fire Protection Goals, Objectives, and Policies:
Framework Element—Safety Element

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 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 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 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, 2001.

- Policy 9-1.2: Encourage the Fire Department to locate fire service facilities in appropriate locations throughout the community to maintain safety.

(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 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste.

Section 57.108.7 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: LAFD communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

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.[8] 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.[9]

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[10]

(g) Measure J

Measure J, which was approved by voters at the November 7, 2006, General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres.

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

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

[10] *City of Los Angeles, Inter-Departmental Correspondence, SB 165 Annual Report Requirements for Fiscal Year 2012–2013 Proposition Q Program, June 30, 2016.*

(h) Los Angeles Fire Department Strategic Plan 2023–2026

The Los Angeles Fire Department Strategic Plan 2023-2026 is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2023-2026 builds upon the progress of the previous Strategic Plan from 2018–2020. As provided in the Strategic Plan 2023-2026, seven goals will guide the LAFD for the next three years: (1) Deliver exceptional public safety and emergency services; (2) Promote a safe, healthy, and progressive work environment that effectively manages personal and organizational risk; (3) Commit to an organization that embraces diversity, equity, and inclusion; (4) Improve collaboration, participative leadership, and responsible performance management; (5) Foster personal, professional development and organizational succession; (6) Explore, implement and integrate technological innovations and advancements; and (7) Enhance community resilience, disaster recovery capabilities, and environmental sustainability.

b. Existing Conditions

(1) Fire Protection Services, and Facilities

The LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction. At any given time, a total of 1,018 firefighters, including 270 paramedics, are on 24-hour duty. In addition, the LAFD is supported by 381 technical and administrative personnel.[11]

As provided in Figure IV.J.1-1 on page IV.J.1-14, the LAFD has identified six LAFD fire stations located in the vicinity of the Project Site that could provide fire protection services to the Project Site. Fire Station No. 63 located at 1930 Shell Avenue is approximately 1.4 miles northwest of the Project Site and is the closest LAFD station to the Project Site. Fire Station No. 63 is the designated "first in" station to the Project Site.[12] As shown in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 63 consists of a task force, paramedic rescue ambulance, and 12 staff.[13]

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[11] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed June 12, 2023.*

[12] *LAFD, FireStatLA, www.lafd.org/fsla/stations-map, accessed June 12, 2023.*

[13] *Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, June 13, 2023.* Provided in Appendix *I* of this Recirculated Draft EIR.

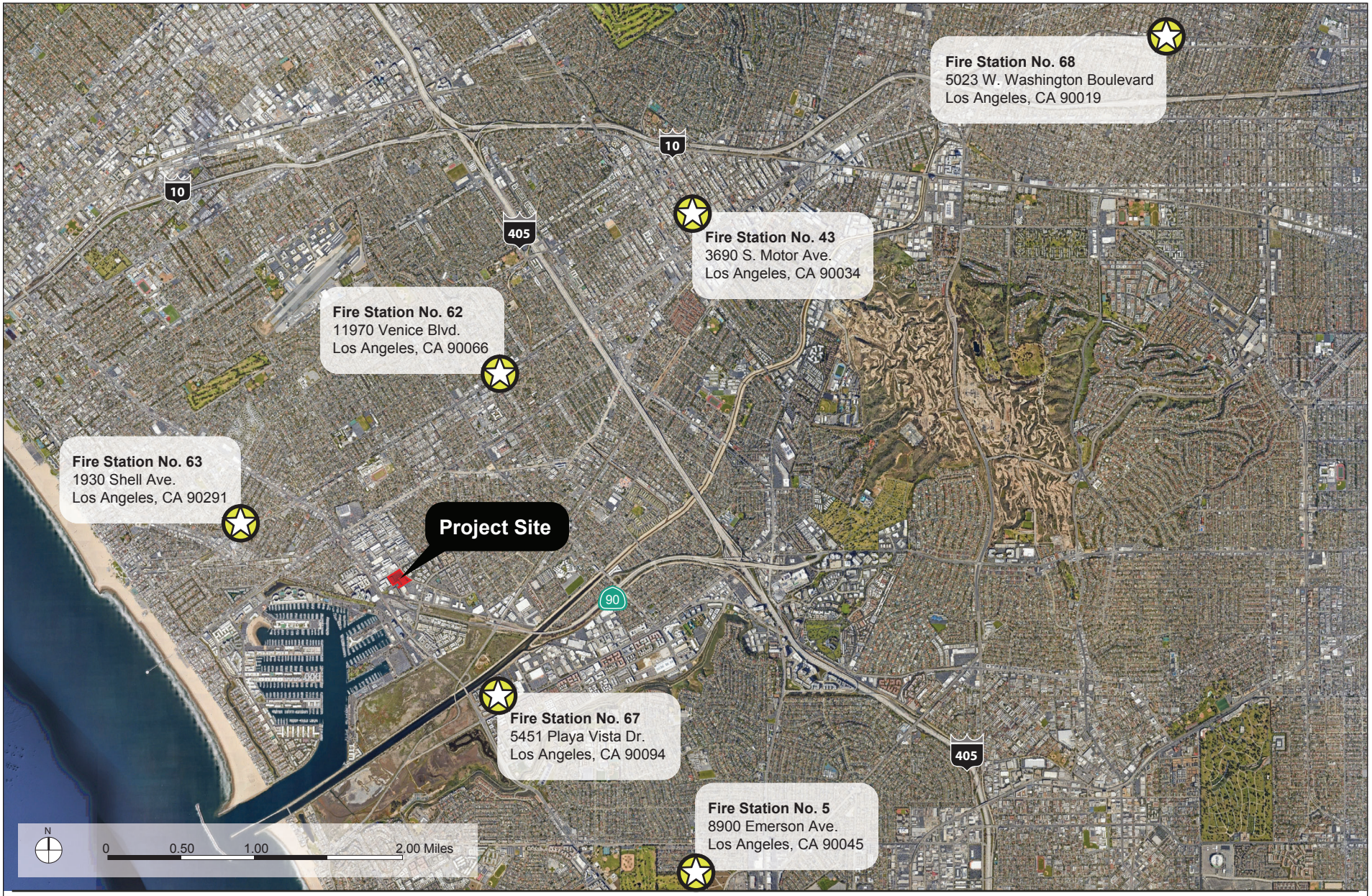

Figure IV.J.1-1
Fire Stations in the Vicinity of the Project Site

Source: Apple Maps, 2017.

Secondary fire stations that could serve the Project Site include Fire Station No. 67, which is located approximately 1.8 miles south of the Project Site at 5451 Playa Vista Drive, and Fire Station No. 62, which is located approximately 2 miles from the Project Site.[14] Fire Station No. 67 is equipped with an assessment engine, a basic life support rescue ambulance, and a staff of six.[15] Fire Station No. 62 is equipped with an assessment engine, paramedic rescue ambulance, and a staff of six.[16]

Station No. 5, which is located approximately 3.7 miles southeast of the Project Site at 8900 Emerson Avenue,[17] is equipped with a task force truck and engine company, a paramedic rescue ambulance, 14 staff, and serves as the Battalion 4 headquarters. Fire Station No. 43, which is located approximately 3.9 miles northeast of the Project Site at 3690 South Motor Avenue,[18] is equipped with a single engine company, a paramedic rescue ambulance, and a staff of six. Fire Station No. 68, which is located approximately 9.1 miles northeast of the Project Site at 5023 W. Washington Boulevard, is equipped with an engine, a paramedic rescue ambulance, and a staff of eight.

The response times shown in Table IV.J.1-4 on page IV.J.1-17 are provided for informational purposes since LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.[19] Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of the path of an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid

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[14] *Ibid.*

[15] *Ibid.*

[16] *Ibid.*

[17] *LAFD, FireStatLA, www.lafd.org/fsla/stations-map, accessed June 12, 2023.*

[18] *While this fire station was omitted from the written correspondence provided by LAFD in March 2021, it is identified in the previous written correspondence from LAFD received August 2017 that was referenced and included in the original Draft EIR*.

[19] *NFPA, NFPA 1710—Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for emergency medical service and fire suppression incidents.*

Table IV.J.1-3
Los Angeles Fire Department Fire Stations Located in the Project Vicinity

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 63 1930 Shell Ave. Los Angeles, CA 90291	1.4 miles	• Task Force • Paramedic Rescue Ambulance	• 12 staff
Fire Station No. 67 5451 Playa Vista Dr. Los Angeles, CA 90094	1.8 miles	• Assessment Engine • BLS Rescue Ambulance	• 6 staff
Fire Station No. 62 11970 Venice Blvd. Los Angeles, CA 90066	2.0 miles	• Single Engine Company • EMT Rescue Ambulance	• 6 staff
Fire Station No. 5 8900 Emerson Ave. Los Angeles, CA 90045	3.7 miles	• Light Force • Assessment Engine • Paramedic Rescue Ambulance • EMS Battalion • Back-up US&R Apparatus	• 14 staff
Fire Station No. 68 5023 W. Washington Boulevard Los Angeles, CA 90019	9.1 miles	• Engine • Paramedic Rescue Ambulance	• 8 staff

Source: Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, June 13, 2023.

in emergency response.[20] The City has over 205 miles of major arterial routes that are equipped with FPS.[21]

Although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area 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) 242 Cal. App. 4th 833, 847 ruling, the

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

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

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

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 63	5:16	5:22
Fire Station No. 67	5:55	6:15
Fire Station No. 62	5:39	5:45
Fire Station No. 5	6:07	6:19
Fire Station No. 43	5:02	5:01
Fire Station No. 68	4:56	5:01

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

Source: LAFD, FireStatLA, Fire Station 63 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=63&year=2023, accessed June 8, 2023; LAFD, FireStatLA, Fire Station 67 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=67&year=2023, accessed June 8, 2023; LAFD, FireStatLA, Fire Station 62 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=62&year=2023, accessed June 8, 2023; LAFD, FireStatLA, Fire Station 5 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=5&year=2023, accessed June 8, 2023; LAFD, FireStatLA, Fire Station 43 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=43&year=2023, accessed June 8, 2023; LAFD, FireStatLA, Fire Station 68 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=68&year=2023, accessed June 8, 2023.

City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

(2) Emergency Access

As described in Section II, Project Description, of this Recirculated Draft EIR, the Project Site is currently occupied by three shopping center buildings that together comprise approximately 100,781 square feet. Vehicular access to the Project Site, including emergency access, is located along Maxella Avenue and Glencoe Avenue.

(3) Fire Water Infrastructure

As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC). Based on the Utility Report included in Appendix J of this

Recirculated Draft EIR, water service is currently provided to the Project Site via a 12-inch water main in Maxella Avenue, a 12-inch line in Glencoe Avenue, and an 8-inch line that runs along the southeastern portion of the Project Site. In addition, there are currently six existing fire hydrants located within 400 feet of the Project Site boundary, including two hydrants along Maxella Avenue and four hydrants on Glencoe Avenue. All six hydrants are served by existing 6-inch water lines.[22]

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[23] Therefore, the Project Site is not located within a fire hazard area.

(5) Reorganization by the LAFD[24]

In January 2015, the LAFD initiated a major reorganization of the Department's Emergency Services Bureau, creating four distinct geographic bureaus, each with a Deputy Chief reporting directly to the LAFD Chief Deputy of Emergency Operations. The objective of this reorganization was for each new Bureau Commander and their staff to establish a more effective and responsive business model than was previously possible through the traditional rotating shift, platoon duty system. The bureaus were organized to operate during normal weekday business hours and allow bureau commanders and staff to be available 24 hours each day to respond to significant emergencies.

As the LAFD has established an organizational model aligned with that of the LAPD, the four bureaus include Central Bureau (at Fire Station No. 3), South Bureau (at San Pedro City Hall complex), Valley Bureau (at Fire Station No. 88), and West Bureau (at Fire Station No. 82 Annex). The new four-bureau system, similar to that of the LAPD, makes the LAFD more effective and responsive to community needs.

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[22] *Fuscoe Engineering, Paseo Marina—Water and Sewer Infrastructure Assessment Report, March 3, 2017, revised September 4, 2020, included as Appendix J of this Recirculated Draft EIR.*

[23] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report., http://zimas.lacity.org/, accessed July 7, 2023.*

[24] *LAFD Implements New Bureau Command Structure, January 12, 2015, http://lafd.org/news/lafd-implements-new-bureau-command-structure, accessed June 12, 2023.*

3. Project Impacts

a. Thresholds of Significance

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

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

For this analysis, the Appendix G Threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold question.

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate fire protection:

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

b. Methodology

Project impacts regarding fire services are evaluated by the LAFD on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, and response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effect on fire protection and emergency medical services.

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities would be needed. In the event that the City determines that expanded or new emergency facilities are warranted 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 acre and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332.

c. Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant would implement a worksite traffic control plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options—Option A and Option B. Under Option A, the Project proposes the development of 658 multi-family residential units and 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and approximately 13,650 square feet of restaurant space. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. Both development options are evaluated in the following analysis.

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

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by the Occupational Safety and Health Administration.[25] Additionally, in accordance with the provisions of the Occupational Safety and Health Administration, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[26] Construction of the Project would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities associated with the Project to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials. Additionally, as indicated in Table IV.J.1-3 on page IV.J.1-16, the designated "first-in" station, Fire Station No. 63, located approximately 1.4 mile northwest of the Project Site is located within the 1.5-mile response distance from a fire station with a truck company. This fire station meets the LAFD's first-in distance standards (a primary metric for adequate determinations) to the Project Site of 1.5 miles for a Truck Company. The LAFD also identifies Fire Station No. 11, No. 5, No. 43, No. 62, and No. 67 as serving the Project Site (see Table IV.J.1-3 on page IV.J.1-16).[27]

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[25] *United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document ?p_table=STANDARDS&p_id=10671, accessed June 12, 2023.*

[26] *United States Department of Labor. Occupational Safety & Health Administration. Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document? p_table=STANDARDS&p_id=10671, accessed July 6, 2023.*

[27] *Written correspondence from David Perez, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, June 13, 2023.*

Construction of the Project could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. In addition, a worksite traffic control plan would also be implemented during construction of the Project pursuant to Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Recirculated Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access along Lincoln Boulevard, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, as discussed in Section IV.K, Transportation, of this Recirculated Draft EIR, construction of the Project would generate fewer trips than the trips generated by the existing uses. In addition, construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could potentially interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-ways. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, construction of the Project would not require a new fire station or the expansion of an existing facility in order to maintain service. Therefore, impacts to fire protection services during construction of the Project would be less than significant.

(b) Operation

(i) Facilities and Equipment

As detailed above in the Regulatory Framework subsection, pursuant to Section 57.507.3.3 of the LAMC, land uses in the Industrial and Commercial category, such as the Project, require a response distance of 1 mile from a fire station with an engine company and a response distance of 1.5 miles from a fire station with a truck company. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. As discussed above, Fire Station No. 63, which would serve as the "first-in" fire station to the Project Site, is located approximately 1.4 miles northwest of the Project Site, and is equipped with a task force, a paramedic rescue ambulance, and 12 staff. Based on the Project's categorization as an Industrial and Commercial land use and distance from the nearest fire station (1.4 miles), the Project would be located outside of the required 1-mile response distance from a fire station with an engine company but would be located within the 1.5-mile response distance from a fire station with a truck company. Therefore, as stipulated in Section 57.507.3.3 of the LAMC, the Project would be required to construct all structures with automatic fire sprinkler systems.

As discussed in Section II, Project Description, of this Recirculated Draft EIR, the Project Site is currently occupied by three shopping center-related buildings that together comprise approximately 100,781 square feet. Since the Project Site does not contain any housing units, there are currently no residents on the Project Site that would require LAFD fire protection services. The existing retail and restaurant uses generate a daytime employee population of approximately 218 employees.[28]

As previously described, Option A would include the development of 658 new multi-family residential units and up to 27,300 square feet of neighborhood-serving retail and restaurant uses, including 13,650 square feet of retail and 13,650 square feet of restaurant uses, which would generate new residential and employee populations in the service area of Fire Station No. 67. Development of 658 multi-family residential units would result in a net increase of approximately 1,481 residents.[29] In addition, the development of up to 27,300 square feet of neighborhood-serving retail and restaurant uses would

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[28] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the existing retail uses (92,249 square feet) and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the existing restaurant uses (8,532 square feet).*

[29] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "Multi-Family Residential" generation rate of 2.25 persons per unit.*

generate approximately 82 employees.[30] Overall, Option A would generate an on-site fire service population of approximately 1,345 net new persons (residents and employees).

Option B would include the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. Development of 425 multi-family residential units would result in a net increase of approximately 957 residents.[31] In addition, the Project's office, retail, and restaurant uses would generate approximately 480 employees.[32] Overall, Option B would generate an on-site fire service population of approximately 1,219 net new persons (residents and employees). Therefore, the Project's population under either Option A or Option B would increase the demand for LAFD fire protection services.

The proposed uses under Option A and Option B would be expected to generate a range of fire service calls similar to other such uses, including kitchen/house fires, garbage bin fires, car fires, electrical fires, etc. These types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment typically found at the local fire stations. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site.

Additionally, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm, communications systems, etc., including as set forth in the written correspondence from the LAFD included in Appendix I

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[30] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the proposed retail uses (13,650 square feet) and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (13,650 square feet).*

[31] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "Multi-Family Residential" generation rate of 2.25 persons per unit.*

[32] *Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "General Office" employee generation rate of 4 employees per 1,000 square foot applied to the proposed (90,000 square feet), the "General Retail" employee generation rate of 2 employees per 1,000 square foot applied to the proposed retail uses (20,000 square feet), and the "High-Turnover-Sit-Down Restaurant" employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (20,000 square feet).*

of this Recirculated Draft EIR. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. In addition, in accordance with the fire protection-related goals, objectives, and polices set forth in the Framework Element, the General Plan Safety Element, and the Palms–Mar Vista–Del Rey Community Plan, as listed in the Regulatory Framework discussion above, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 9-1.1 of the Palms–Mar Vista–Del Rey Community Plan), and coordinate the development of new fire facilities to be phased with growth (refer to Objective 9.18 of the Framework Element). **Given these procedures and policy directives, as well as LAFD's continued evaluation of existing fire facilities, Project impacts with regard to LAFD facilities and equipment would be less than significant.**

(ii) Emergency Access

As described in Section II, Project Description, of this Recirculated Draft EIR, vehicular access, including emergency vehicle access, to the Project Site under Option A would be provided via five driveways, including two entry/exit driveways located along Ocean Way west of Building 1, one entry/exit driveway along Maxella Avenue, one entry/exit driveway along Glencoe Avenue, and one entry/exit driveway located along the southern boundary of the Project Site. Under Option A, emergency vehicles could also access the Project Site via the east-west paseo off Glencoe Avenue. Under Option B, vehicular access, including emergency vehicle access, to the Project Site would also be provided via five driveways, including three entry/exit driveways located along Ocean Way west of Building 1 and two entry/exit driveways located along the southern boundary of the Project Site. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access as set forth in the written correspondence from the LAFD included in Appendix I of this Recirculated Draft EIR. Additionally, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness,

curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Furthermore, drivers of emergency vehicles can avoid traffic by using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. **Overall, emergency access to the Project Site and surrounding area would be maintained, and impacts with regard to emergency access would be less than significant.**

(iii) Fire Flow

As discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Recirculated Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Appendix I of this Recirculated Draft EIR, the Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 gallons per minute (gpm) to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum residual water pressure of 20 pounds per square inch remaining in the water system. As discussed in the Utility Report, a Service Advisory Request application was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. LADWP has indicated that the existing public water system would provide adequate water pressure for both fire and domestic services with more than the required residual pressure of 20 pounds per square inch available in the water system.

Additionally, as set forth in LAMC Section 57.507.3.2, land uses considered under the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. As previously described, there are currently six existing fire hydrants located within 400 feet of the Project Site. Two hydrants are located along Maxella Avenue and four hydrants are located on Glencoe Avenue. Based on consultation with LADWP, LADWP's initial review of the Project determined that [no] additional fire hydrants would be required to provide adequate

fire coverage. If later required by the LAFD during their fire/life safety plan review, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

Based on the above, LADWP would be able to supply sufficient flow and pressure to satisfy the Project's fire suppression needs. Therefore, the Project would meet fire flow requirements, and impacts with regard to fire flow would be less than significant.

(iv) Conclusion

Based on the analysis above, the operation of the Project would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Additionally, as concluded in the written correspondence from the LAFD included in Appendix I of this Recirculated Draft EIR, with the implementation of the recommendations set forth therein along with any additional recommendations that could be made during later reviews of the Project as part of the normal building permit process, potential impacts to fire protection services would be addressed. **Therefore, the operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Impacts to fire protection services during the operation of the Project would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection services is the service areas of Fire Station Nos. 63, 67, 62, 5, 43, and 68. The Project, in

conjunction with growth forecasted in the City through 2023 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2027 includes 14 known development projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Recirculated Draft EIR.

A number of the identified related projects and ambient growth projections would fall within the service areas of Fire Station Nos. 63, 67, 62, 5, 43, and 68. The increase in development and service populations 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 by the LAFD on a project-by-project basis to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection. Furthermore, each related project would be required to comply with regulatory requirements related to fire protection. Additionally, the Project and each related project would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current standards for the type and intensity of land uses involved. The Project and related projects also would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time, as appropriate.

Additionally, consistent with the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b.(1) above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD 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 under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and, as

such, would not be expected to result in significant impacts.[33] Therefore, development of a station at this scale is unlikely to result in significant unmitigated impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

Based on the above, the Project's contribution to cumulative impacts to fire protection would not be cumulatively considerable. As such, cumulative impacts on fire protection would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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