

## **IV. Environmental Impact Analysis**

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### **H.1 Public Services—Fire Protection**

#### **1. Introduction**

This section of the Draft EIR provides an analysis of the Project’s potential impacts on fire protection facilities. The analysis includes a description of the existing fire protection facilities within the Project area. The analysis uses analyzes impacts to facilities using the following factors: fire flow requirements, response distance, and emergency access. This analysis is based, in part, on information provided by the Los Angeles Fire Department (LAFD) included as Appendix I of this Draft EIR, and the *Utility Infrastructure Technical Report: Water, Wastewater, and Energy* (Utility Report), prepared for the Project by KPFF Consulting Engineers (February 27, 2018), which is included in Appendix E of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) Federal**

The federal and California Occupational Safety and Health Administrations enforce the provisions of the federal and state Occupational Safety and Health Acts (OSHA and CalOSHA), 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 OSHA 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.

###### **(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 fire safety standards for new buildings,

which are provided 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 2016 edition of the California Building Code became effective on January 1, 2017.<sup>1</sup> 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. The 2016 California Fire Code also went into effect on January 1, 2017.<sup>2</sup> 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.

(b) *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 directed 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, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.<sup>3</sup> The *Hayward* ruling also concluded that “assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause

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<sup>1</sup> *California Building Code, (CCR, Title 24, Part 2).*

<sup>2</sup> *California Fire Code, (CCR, Title 24, Part 9).*

<sup>3</sup> *City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.*

a substantial adverse effect on human beings” and the “need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate.”<sup>4</sup>

### (3) City of Los Angeles

#### (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. 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, emergency medical services (EMS), and infrastructure.<sup>5</sup> 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 EMS, 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. The City of Los Angeles General Plan Safety Element, discussed below, recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies. Under the Framework Element, the City standard for response distance from a fire station is 1.5 miles.<sup>6</sup> This is consistent with the specifications for response distances within the LAMC, discussed below.

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<sup>4</sup> *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

<sup>5</sup> *City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services.*

<sup>6</sup> *City of Los Angeles General Plan Framework Element, p. 9-5.*

*(c) City of Los Angeles General Plan Safety Element*

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 26, 1996, 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. For example, Policy 2.1.6 requires the LAFD to revise regulations and procedures to include the establishment of minimum standards for the location and expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire response. In addition, the Safety Element designates disaster routes. The nearest disaster routes to the Project Site are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than 1 mile of the Project Site. Alameda Street is also a designated disaster route located approximately 0.5 mile east of the Project Site.<sup>7</sup>

*(d) Central City North Community Plan*

As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the Central City North Community Plan area. The Central City North Community Plan, adopted on December 15, 2000 and amended on September 7, 2016, includes the following objectives and policies that are relevant to fire protection:

- Objective 9-1: ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City North.
- Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine impact on service demands.
- Policy 9-1.2: Encourage the Fire Department to locate fire services facilities in appropriate locations throughout the community in order to maintain safety.

*(e) Los Angeles Municipal Code*

The LAMC includes provisions for new construction projects within the City. It contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the Safety Element. LAMC Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code) sets

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<sup>7</sup> *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.*

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.<sup>8</sup>

Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, LAMC Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the City's Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, LAMC Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

The LAMC also addresses access, fire water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Mixed-use developments typically fall under the Industrial and Commercial category. As set forth in LAMC Section 57.507.3.1, the Industrial and Commercial category, which has a minimum required fire flow of 6,000 to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow, which translates to 1,500 gpm per hydrant.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and

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<sup>8</sup> *Ordinance Number 184,913, effective May 19, 2017, updated the Los Angeles Fire Code to incorporate by reference portions of the 2016 edition of the California Fire Code and the 2015 edition of the International Fire Code.*

2.5-inch by 4-inch double fire hydrants 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.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on LAMC Table 57.507.3.3, the maximum response distance for land uses in the Industrial and Commercial category from fire stations with an engine company is 1 mile and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. The LAMC classifies high-rises as buildings where the highest occupied floor level is more than 75 feet above the lowest point of fire access. LAMC Section 57.409 LAMC addresses emergency planning and evacuation requirements for high-rise buildings, including the creation and filing of an emergency plan; LAFD approval of emergency plans, procedures, and evacuation signs; required designated personnel; fire drills; fees; and violations. All emergency plans, procedures, and evacuation signs must be completed and submitted to the LAFD for inspection and approval prior to their implementation in accordance with LAMC Section 57.409.3. LAMC Section 57.409.8.3 requires emergency evacuation signs to be posted in elevator lobbies and adjacent to the doorway leading to the exit stairs. LAMC Section 57.409.9.3 requires residential high-rise buildings to conduct mandatory fire drills at least annually under the direction of a designated Fire Safety Director. In addition, LAMC Section 57.4705 addresses specific fire safety requirements for new high-rises, including specific requirements related to an elevator system, vertical exit enclosures, portable fire extinguishers in each residential occupancy unit, and standby power for window washing equipment. In accordance with LAMC Section 57.4705.1.6, at least one elevator in each bank of elevators must be available for fire emergency service. LAMC Section 57.4705.1.7 requires that at least one elevator car serving all building levels must be available for emergency use.

The LAFD recently modified its Requirement No. 10 pertaining to helicopter landing facilities on high-rise buildings. While helicopter landing facilities are still required, as announced in September 2014 and officially revised in November 2014, pursuant to LAFD Requirement No. 10, an Emergency Helicopter Landing Facility (EHLF) will not be required if specific life safety features are provided and approved by the Fire Marshal in compliance with two options.<sup>9,10</sup> Option 1 (EHLF Equivalency—HTLA) pertains to the provision of a

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<sup>9</sup> *City of Los Angeles Mayor Eric Garcetti, Media, News, City Eliminates Helipad Requirement, www.lamayor.org/city-eliminates-helipad-requirement, accessed March 12, 2020.*

<sup>10</sup> *LAFD, Los Angeles Fire Department Requirement No. 10, Emergency Helicopter Landing Facilities (EHLF) Requirements, revised 11/17/2014.*

Helicopter Tactical Landing Area (HTLA) in lieu of the EHLF. An HTLA is defined by the LAFD as a “designated load bearing area with dimensions that will be less than those required for the load bearing area of an EHLF but with sufficient safety area around the HTLA to provide clearance for the helicopter.” LAFD Regulation No. 10 specifies HTLA and life safety feature requirements under different high-rise building height categories: over 75 feet, but less than 120 feet; over 120 feet, but less than 240 feet; over 240 feet, but less than 420 feet; and over 420 feet, but less than 1,000 feet. For Option 1, life safety features include:

- Two Fire Service Access Elevators
- Two-three stairways with roof access
- Enclosed elevator lobbies
- Escalator openings or stairways that are not part of the means of egress system and connect more than two stories shall be protected by approved power-operated automatic shutters at every penetrated floor

Option 2 (EHLF Equivalency—No EHLF and No HTLA) applies when all life safety elements included in Option 1 have been provided along with additional life safety features included in Option 2. For Option 2, the additional life safety features include:

- An automatic sprinkler system installed throughout the high-rise building. In light and ordinary hazard areas, other than parking garages, listed quick-response sprinklers, including extended coverage quick-response sprinklers, shall be used throughout the system. The National Fire Protection Agency (NFPA) 13 reduction to the hydraulic design area of operation for quick-response sprinkler systems shall not be permitted.<sup>11</sup>
- A Video Camera Surveillance System with cameras located in all Fire Service Access Elevator Lobbies and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft. LAFD video surveillance shall be usable from the LAFD’s “fire control room” and installed with system cabling “survivability” requirements similar to NFPA Standard 72 for fire alarm systems. System cameras are required to be active during a fire alarm condition within the building.
- For high-rise buildings over 420 feet: egress stairways with a capacity, in inches, calculated by multiplying the occupant load served by a means of egress

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<sup>11</sup> *To meet the intent of this life safety feature it will typically require larger size branch lines for the automatic sprinkler system with quick response sprinkler heads.*

capacity factor of 0.3 inch per person. However, the capacity shall not be less than specified elsewhere in the building and fire codes.

*(f) City of Los Angeles Propositions*

Proposition F, the City Fire Facilities Bond, approved by voters in November 2000, allocated \$378.6 million to build 19 new or replacement neighborhood fire/paramedic stations.<sup>12</sup> The Proposition F Fire Facilities Bond Team consists of the LAFD, City Bureau of Engineering, and contracting firm Bovis Lend Lease. This team oversees allocation of the funds. The team identified numerous projects to upgrade fire facilities, including construction of new training centers, replacing and constructing new fire stations, and building a new Air Operations Helicopter Facility and General Services Helicopter Fleet Maintenance Building.<sup>13</sup> Of the stations nearest the Project Site, Fire Station No. 4, previously located at 800 N. Main Street, was replaced with a new fire station at 450 E. Temple Street.<sup>14</sup>

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involves the spending of \$600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities.<sup>15</sup> Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, replacement of one new police station and jail, construction of two bomb squad facilities, construction of one new Metro detention center, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of one new Valley Traffic Division and Bureau Headquarters, renovation of fire facilities, and renovation of police facilities.<sup>16</sup> Renovation of 72 fire facilities was complete as of August/September 2014.<sup>17</sup>

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<sup>12</sup> *City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, [www.eng.lacity.org/fire\\_bond](http://www.eng.lacity.org/fire_bond), accessed March 12, 2020.*

<sup>13</sup> *City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, [www.eng.lacity.org/fire\\_bond](http://www.eng.lacity.org/fire_bond), accessed March 12, 2020.*

<sup>14</sup> *City of Los Angeles, Department of Public Works, Bureau of Engineering, New Standard Fire/Paramedic Station 4, [http://eng2.lacity.org/projects/fire\\_bond/FS4new.htm](http://eng2.lacity.org/projects/fire_bond/FS4new.htm), accessed March 12, 2020.*

<sup>15</sup> *City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.*

<sup>16</sup> *City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013–2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.*

<sup>17</sup> *City of Los Angeles, Department of Public Works, Bureau of Engineering, 2002 Proposition Q Citywide Safety Bond Program, Progress Report—August/September 2014.*

Measure J, which was approved by voters at the November 7, 2006 election, is a charter amendment and ordinance that involves technical changes to Proposition F. Under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations was required to take place on single sites of at least 2 acres. Measure J allows new regional fire stations funded by Proposition F and located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres.

*(g) Los Angeles Fire Department Strategic Plan 2018–2020<sup>18</sup>*

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD’s organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) provide exceptional public safety and emergency service; (2) embrace a healthy, safe and productive work environment; (3) implement and capitalize on advanced technology; (4) enhance LAFD sustainability and community resiliency; and (5) increase opportunities for personal growth and professional development. With implementation of specific strategies, the Strategic Plan 2018–2020 will also align its progress with City of Los Angeles Mayor Eric Garcetti’s four priority outcomes to provide a safe city, a well-run city government, a livable and sustainable city, and a prosperous city.

## **b. Existing Conditions**

### **(1) Fire Protection Services, Facilities, and Response Times**

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.<sup>19</sup> There are 106 neighborhood fire stations strategically located across the LAFD’s 469-square-mile jurisdiction.<sup>20</sup> At any given time, a total of

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<sup>18</sup> LAFD, *Strategic Plan 2018–2020, A safer City 2.0*, [https://issuu.com/lafd/docs/strategic\\_plan\\_final\\_2018.02.09?e=17034503/59029441](https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441), accessed March 12, 2020.

<sup>19</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed March 12, 2020.

<sup>20</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed March 12, 2020.

1,018 firefighters (including 270 serving as firefighter/paramedics) are on 24-hour duty.<sup>21</sup> In addition, the LAFD is supported by 381 technical and administrative personnel.<sup>22</sup>

As shown in Figure IV.H.1-1 on page IV.H.1-11, there are three LAFD fire stations located within a 2-mile radius of the Project Site, and a fourth just outside the 2-mile radius.<sup>23</sup> The closest station to the Project Site is Fire Station No. 17, which is the designated “first in” station, located approximately 0.6 mile south of the Project Site at 1601 South Santa Fe Avenue.<sup>24</sup> As shown in Table IV.H.1-1 on page IV.H.1-12, Fire Station No. 17 consists of an assessment engine, paramedic rescue ambulance, foam tender, HazMat tender, arson investigation unit, and a staff of eight.<sup>25</sup>

Secondary fire stations that serve the Project Site include Fire Station No. 9, located 1.4 miles northwest of the Project Site at 430 E. 7th Street; Fire Station No. 4, located 1.6 miles north of the Project Site at 450 E. Temple Street; and Fire Station No. 2, located 1.7 miles northeast of the Project Site at 1962 Cesar Chavez Avenue.<sup>26</sup> Fire Station No. 9 consists of an assessment engine, assessment truck, BLS ambulance, and a staff of 12; Fire Station No. 4 consists of an assessment engine, paramedic rescue ambulance, EMS battalion captain, BLS rescue ambulance, and a staff of nine; and Fire Station No. 2 consists of an assessment light force, paramedic rescue ambulance, and a staff of 12.<sup>27</sup> Therefore, the Project Site is located within the required response distance from a fire station with an engine or truck company.

The response times for January to February 2020, shown in Table IV.H.1-2 on page IV.H.1-13, are provided for informational purposes since LAFD has not established response time standards for emergency response or adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds

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<sup>21</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed March 12, 2020.

<sup>22</sup> LAFD, *Our Mission*, [www.lafd.org/about/about-lafd/our-mission](http://www.lafd.org/about/about-lafd/our-mission), accessed March 12, 2020.

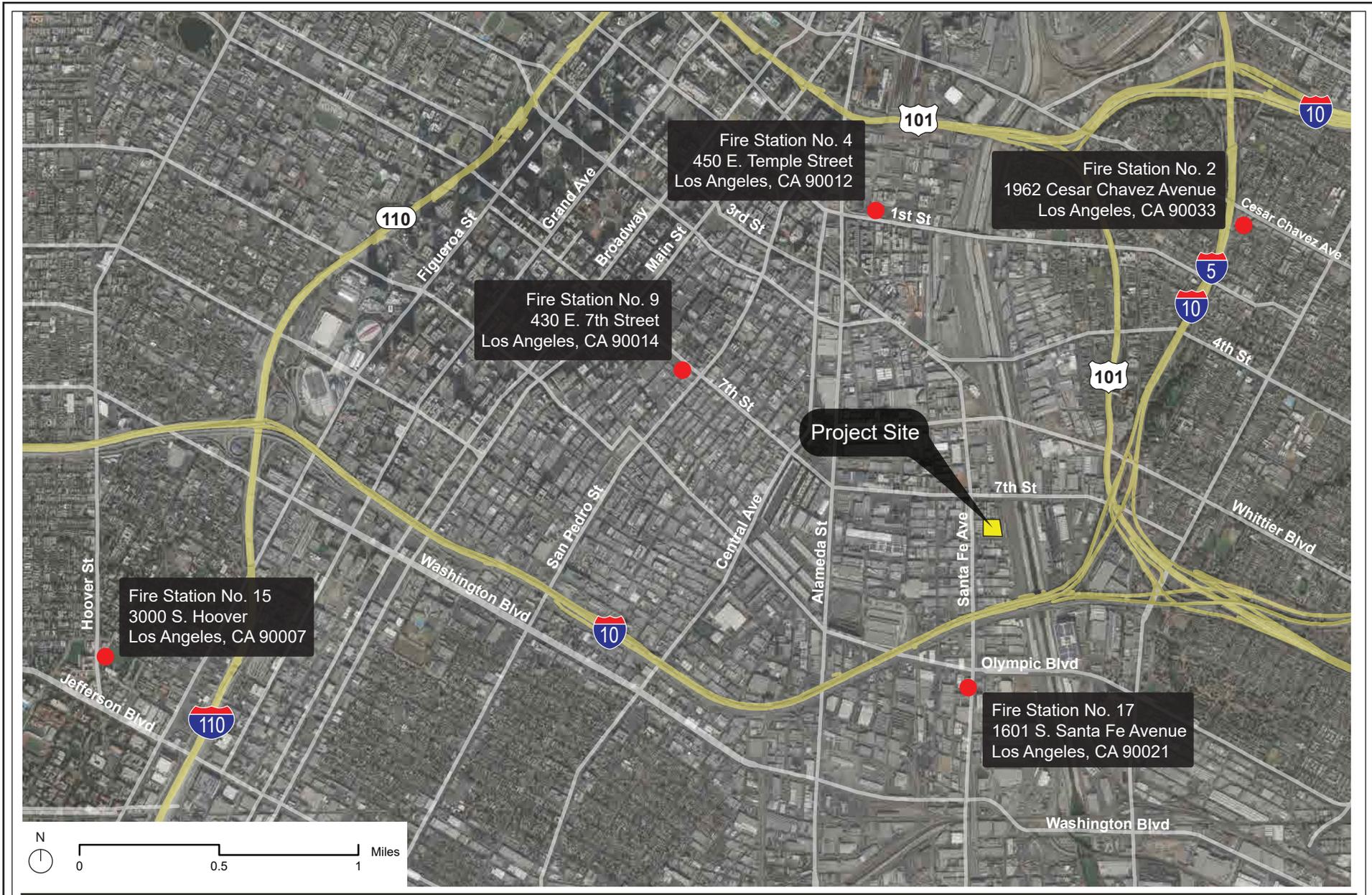
<sup>23</sup> In their letter dated October 16, 2018, LAFD identified four stations within a 2-mile radius. However, the inclusion of Fire Station No. 15 appears to be an error as it is located over 3 miles from the Project Site.

<sup>24</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018.

<sup>25</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018.

<sup>26</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018

<sup>27</sup> Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018



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

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

<b>Station No., Location, and Community Served</b>	<b>Distance from Project Site</b>	<b>Equipment</b>	<b>Staffing</b>
Fire Station No. 17 1601 S. Santa Fe Avenue Los Angeles, CA 90021	0.6 mile	<ul style="list-style-type: none"> <li>• Assessment Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• Foam Tender</li> <li>• Haz-Mat Tender</li> <li>• Arson Investigation Unit</li> </ul>	8
Fire Station No. 9 430 E. 7th Street Los Angeles, CA 90014	1.4 miles	<ul style="list-style-type: none"> <li>• Assessment Engine</li> <li>• Assessment Truck</li> <li>• BLS Rescue Ambulance</li> </ul>	12
Fire Station No. 4 450 E. Temple Street Los Angeles, CA 90012	1.6 miles	<ul style="list-style-type: none"> <li>• Assessment Engine</li> <li>• Paramedic Rescue Ambulance</li> <li>• EMS Battalion Captain</li> <li>• BLS Rescue Ambulance</li> </ul>	9
Fire Station No. 2 1962 Cesar Chavez Avenue Los Angeles, CA 90033	2.3 miles	<ul style="list-style-type: none"> <li>• Assessment Light Force</li> <li>• Engine</li> <li>• Paramedic Rescue Ambulance</li> </ul>	12

Source: Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018.

for fire suppression response.<sup>28</sup> Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.<sup>29</sup> The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.<sup>30</sup> Although response time can be considered to assess the adequacy of fire protection services, LAFD utilizes a variety of other criteria, 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

<sup>28</sup> 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 EMS and fire suppression incidents.

<sup>29</sup> LADOT, *Los Angeles Signal Synchronization Fact Sheet*.

<sup>30</sup> LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, Bulletin No. 133, October 2008.

**Table IV.H.1-2  
Average EMS and Non-EMS Response Times (2020)**

<b>Station</b>	<b>Average Response Time to EMS Incident (Minutes:Seconds)</b>	<b>Average Response Time to Non-EMS Incident (Minutes:Seconds)</b>
Fire Station No. 17	6:37	6:05
Fire Station No. 9	5:58	5:27
Fire Station No. 4	6:23	5:57
Fire Station No. 2	6:31	6:21
Citywide	6:41	6:18

<sup>a</sup> Response times are based on January–February 2020 data.

Source: LAFD, FireStatLA, Station 17 Response Metrics for 2020, [www.lafd.org/fsla/stations-map?st=396&year=2020](http://www.lafd.org/fsla/stations-map?st=396&year=2020), accessed March 12, 2020; LAFD, FireStatLA, Station 9 Response Metrics for 2020, [www.lafd.org/fsla/stations-map?st=356&year=2020](http://www.lafd.org/fsla/stations-map?st=356&year=2020), accessed March 12, 2020; LAFD, FireStatLA, Station 4 Response Metrics for 2020, [www.lafd.org/fsla/stations-map?st=301&year=2020](http://www.lafd.org/fsla/stations-map?st=301&year=2020), accessed March 12, 2020; FireStatLA, Station 2 Response Metrics for 2020, [www.lafd.org/fsla/stations-map?st=311&year=2020](http://www.lafd.org/fsla/stations-map?st=311&year=2020), accessed March 12, 2020; and LAFD, FireStatLA, Citywide Response Metrics for 2020, [www.lafd.org/fsla/stations-map](http://www.lafd.org/fsla/stations-map), accessed March 12, 2020.

responsibility to assign new staff and equipment, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal, App. 4th 833, 847 ruling, the City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services and the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

## (2) Emergency Access

Vehicular access to the Project Site is currently available at driveways along Violet Street, East 7th Place, and a public alley that abuts the Project Site to the west.

## (3) Fire Water Infrastructure

As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via an existing 6-inch water main in 7th Place and an existing 6-inch water main in Violet Street. The Project Site has an active domestic water connection from 7th Place.

#### (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 or Fire District No. 1.<sup>31,32</sup>

### 3. Project Impacts

#### a. Thresholds of Significance

##### (1) State CEQA Guidelines Appendix G

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

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

For this analysis, the Appendix G threshold listed above is relied upon. The analysis utilizes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate to assist in answering the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factor 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

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<sup>31</sup> City of Los Angeles, Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed March 12, 2020.

<sup>32</sup> Fire District No. 1 consists of areas identified by the City that are required to meet additional development regulations to mitigate fire hazard-related risks.

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, 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 services.

The need for or deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact but rather a social and/or economic impact. Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in that project's CEQA document. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would likely 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. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

### **c. Project Design Features**

No Project Design Features are proposed with respect to fire protection. However, as discussed in Section IV.I, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant would implement a Construction Traffic Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

### **d. Analysis of Project Impacts**

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

## (1) Impact Analysis

### (a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. In most cases, implementation of good housekeeping procedures by the construction contractors and work crews would minimize these hazards. Construction activities also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations, including the required upgrades to the water mains in 7th Place and Violet Street. These impacts would be less than significant for the following reasons:

- Construction impacts are inherently temporary in nature and do not cause lasting effects that would impact LAFD fire protection services.
- In accordance with OSHA regulations set forth in 29 CFR, Part No. 1926, construction managers and personnel would be trained in emergency response and fire safety operations and fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic pursuant to California Vehicle Code (CVC) Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic.
- Impacts that could temporarily affect emergency response are addressed through the Construction Traffic Management Plan, prepared for the Project pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR. Project Design Feature TR-PDF-1 will ensure that adequate and safe access remains available within and near the Project Site during construction activities. 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 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-way.

**Based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain acceptable service ratios, response distances, or other**

**performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.**

*(b) Operation*

*(i) Facilities and Equipment*

The Project Site would continue to be served by Fire Station No. 17, the “first-in” station for the Project Site, located approximately 0.6 mile south of the Project Site. As shown in Table IV.H.1-1 on page IV.H.1-12, Fire Station No. 17 is equipped with an assessment engine, paramedic rescue ambulance, foam tender, HazMat tender, arson investigation unit, and a staff of eight. In addition, Fire Station No. 9, located 1.4 miles northwest of the Project Site, is equipped with an assessment engine, assessment truck, BLS rescue ambulance, and staff of 12. As such, the Project Site is located within the required 1.0-mile engine company and 1.5-mile truck company response distances and the LAFD considers fire protection to be adequate.<sup>33</sup> Furthermore, as shown in Table IV.H.1-1, although located beyond the specified response distance requirements, Fire Station Nos. 4 and 2 have been identified by the LAFD as capable of initial responses needed at the Project Site.

The Project’s development of 347 new live-work units would introduce a new residential population of 840 persons, based on the most recent estimated household size of 2.42 persons per unit for multi-family housing units in the City of Los Angeles.<sup>34</sup> When accounting for the removal of four existing live-work units on the Project Site, the net population increase would be 830 persons. In addition, based on employee generation rates included in the Los Angeles Unified School District’s (LAUSD) Developer Fee Justification Study, the Project’s 187,374 square feet of new office space, 21,858 square feet of new retail/restaurant floor area, and 926 square-foot community room that residents could use for art creation would generate approximately 961 employees.<sup>35</sup> Therefore, the Project’s population would increase the demand for LAFD fire protection services, which could, in turn, result in a need for new or physically altered government facilities.

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<sup>33</sup> *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 16, 2018*

<sup>34</sup> *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019*

<sup>35</sup> *The 2018 LAUSD Developer Fee Justification Study does not include an employee generation rate for artist production space. To provide a conservative estimate, the highest generation rate (i.e., Standard Commercial Office) was used.*

However, the Project would implement Los Angeles Building and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. In addition, as described above, the Project, which would include high-rise structures, is required by the LAMC Section 57.4705.4 to provide an EHLF, as described in Subsection 2.a.(3)(e) or to implement one of two alternate options to an EHLF. The Project would comply with Option 2 of LAFD Requirement No. 10 and acquire approval from the Fire Marshal for this option. In compliance with Option 2, the Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

*(ii) Emergency Access*

Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. Furthermore, 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. Additionally, drivers of emergency vehicles have a variety of options for avoiding traffic, such as 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, and the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes. Furthermore, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be 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.

*(iii) Fire Flow*

As described in Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required minimum fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow, which translates to 1,500 gpm per hydrant. Additionally, hydrants must be spaced to provide adequate coverage of the building exterior.

As discussed in the Utility Report, included as Appendix E of this Draft EIR, the Information of Fire Flow Availability Report (IFFAR) submitted to LADWP shows six nearby hydrants flowing simultaneously for a combined 7,000 gpm. Therefore, under existing conditions, the Project Site does not currently have adequate fire flow to demonstrate compliance with LAMC Section 57.507.3. However, the Project would include necessary upgrades to improve the surrounding water mains that would facilities flow and pressure requirements. Specifically, as discussed in the Utility Report included as Appendix E of this Draft EIR, the Project may require construction of new public water mains within the public right of way. This work would include replacing the existing 6-inch mains in both 7th Place and Violet Street and may require supplementary water main construction in Santa Fe Avenue.

Furthermore, in accordance with LAFD Regulation No. 10 Option 2, the Project will incorporate a fire sprinkler suppression system to reduce or eliminate public hydrant demands, which will be subject to LAFD review and approval during the design and permitting phase of the Project. The maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. As part of the Utility Report, a Service Advisory Report (SAR) was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. Based upon the SAR results, LADWP outlined potential improvements to the water supply infrastructure that may be necessary. The planned upgrades to the water mains near the Project Site would be sufficient to provide the necessary flow and pressure.

*(iv) Conclusion*

**Based on the above analysis, the Project is not anticipated to generate a demand for additional fire facilities Project operation would not 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. Therefore, impacts to fire protection during Project operation would be less than significant, and no mitigation measures are required.**

## (2) Mitigation Measures

Project-level impacts would be less than significant and no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts would be less than significant without mitigation.

# e. Cumulative Impacts

## (1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection are the service areas of Fire Station Nos. 17, 9, 4, and 2. The Project, in conjunction with growth forecasted in the City through 2024 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection service, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2024 includes specific known development projects, growth that may be projected as a result of the land use designation and policy changes contained in the Central City North Community Plan Update, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 74 is a conservative assumption, as some of the related projects may not be built out by 2024 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 74 are fully built out by 2024, unless otherwise noted.

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 17, 9, 4, and 2. The increase in development and residential service populations from the Project, related projects, as well as other future development in the Central City North Community Plan area would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services resulting in a need for new or physically altered government facilities if the Project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects and other future development projects in the Central City North Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards

measures are implemented.. Furthermore, each related project and other future development projects in the Central City North Community Plan area would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects in the Central City North Community Plan area would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, given that the Project Site is located within an urban area, each of the related projects identified in the area, as well as other future developments, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. The Project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.<sup>36</sup>

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City and the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate. The *Hayward* ruling also concluded the "city has a constitutional obligation to provide adequate fire protection services. Assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings." 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. LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the area. However, if LAFD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would likely 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 would not be expected to result in significant impacts.<sup>37</sup> Further analysis, including a specific location, would be speculative

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<sup>36</sup> *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

<sup>37</sup> *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.*

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

**Based on the above, a cumulatively considerable increase in fire protection services demand that would require a new fire station, or the expansion of an existing fire station, the construction of which could cause significant environmental impacts, is not anticipated from the development of the Project or related projects, and cumulative impacts related to fire protection services would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts would be less than significant and no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts would be less than significant without mitigation.