IV. Environmental Impact Analysis

L.1 Public Services – Fire Protection

1. Introduction

This section describes the existing fire protection services for of the Project Site and vicinity, identifies associated regulatory requirements, and evaluates the potential impacts related to implementation of the proposed Project. Specifically, this section addresses the potential environmental impacts of the proposed Project on fire protection services in the City of Los Angeles, and the ability of existing Los Angeles Fire Department (LAFD) facilities in the Project area to accommodate the Project's needs for such fire protection facilities. The Project's fire protection needs are assessed through consideration of the types of proposed land uses, the demand created by the proposed land uses, and the distance of the Project Site from the nearest fire stations. This section is based on written correspondence from the LAFD, included as Appendix K-1 of this Draft Environmental Impact Report (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 Agency
- 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
- Los Angeles Fire Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020
- Community Plan

(1) Federal

(a) Occupational Safety and Health Administration

The Occupational Safety and Health (OSHA) addresses fire safety. OSHA's laws and regulations are codified in Title 29 of the Code of Federal Regulations (CFR). Fire safety, with regard to compliance with exit routes and emergency planning, automatic sprinkler systems, alarm systems, and fire precautions in the workplace are addressed for general industry.[1] Additionally, Part 1926 Subpart F provides fire protection and prevention regulations for construction, which generally requires employers to be responsible for the development of a fire protection program to be followed during all phases of project construction.[2]

(b) Federal Emergency Management Agency

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.

1 29 Code of Federal Regulations (CFR) 1910.
2 CFR 1926.150.

(c) Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [USC] Section 5121) provides the legal basis for FEMA mitigation planning requirements for state, local, and tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988[3] 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 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 this 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
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation) 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

[3] 42 United States Code (USC) 5121–5207.

standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.[4] 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.[5]

(b) California Fire Service and Rescue Emergency Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (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).[6] 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, the 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 the OES.[7]

(c) California Vehicle Code

California Vehicle Code Section 21806, pertaining to emergency vehicles responding to Code 3 incidents/calls, 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

4 California Building Code, (24 California Code of Regulations [CCR], Part 2).
5 Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.
6 Governor's Office of Emergency Services, State of California Emergency Management Mutual Aid Plan, November 2012.
7 Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.

> 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, 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 was adopted by the voters in 1993 under Proposition 172, which directs that the proceeds of a 0.50 percent sales tax be expended exclusively on local public safety services, including fire protection services. California Government Code 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 1992–1993 fiscal year. Therefore, the City of Los Angeles (City) is required to use Proposition 172 funds to supplement its local funds used to pay for 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 California Court of Appeals held that Section 35 imposes "a constitutional obligation [on cities] to provide adequate fire protection services."

(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[8], 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,

[8] Government Code Section 8607; 19 CCR 2401 et seq.

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, below). California Emergency Management Agency (Cal-EMA) maintains oversight of the state's mutual aid system.

(3) Local

(a) City of Los Angeles Charter

Section 520 of the City of Los Angeles 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 should have the necessary level of fire protection service, emergency medical service, and infrastructure.[9] 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 ensure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine

[9] City of Los Angeles General Plan Framework Element, 2001, Chapter 9: Infrastructure and Public Services.

companies from neighborhood land uses is 1.5 miles.[10] This is consistent with the specifications for response distances within the LAMC, discussed below.

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.

Policy 9.18.1: Engage in fire station development advance planning, acknowledging the amount of time needed to fund and construct these facilities.

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.

[10] City of Los Angeles General Plan Framework Element, 2001, Chapter 9: Infrastructure and Public Services, Status of Infrastructure System/Facilities, Fire.

(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 and designates disaster routes. The following Safety Element goals and policies relate to fire protection and response.

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 [gallons per minute] 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.]

(c) Los Angeles Fire Code

The Los Angeles Fire Code[11] incorporates by reference portions of the California Fire Code and the International Fire Code. The Los Angeles Fire Code sets forth regulatory

[11] Los Angeles Municipal Code (LAMC) Chapter V, Article 7.

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.

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.

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 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.

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

LAMC 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.

LAMC 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).

LAMC Section 57.4704.4.3.1 requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every 6 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.

LAMC Section 57.4705.1.6 requires there must be at least one elevator that shall be available for fire emergency medical service (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.

LAMC Section 57.4705.4 requires each building to have a rooftop emergency helicopter landing facility in a location approved by the Fire Chief.

LAMC 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.

LAMC 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, with a minimum residual water pressure of 20 pounds per square inch 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.

LAMC 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.

LAMC 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.

LAMC 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 LAMC Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

(d) 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 that 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.[12]

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.[13]

(e) Measure J

Measure J, approved by voters in the November 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.

(f) Los Angeles Fire Department Strategic Plan 2018–2020

The Los Angeles Fire Department Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. It provides five goals that 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.

[12] Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond Progress Report, February-March 2016.

[13] City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report, February/March 2016,

(g) 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 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 Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following objectives and policies that are relevant to fire protection:

> **Objective 5:** To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.
>
> *Fire Protection Policy 1:*It is the City's policy that the various components of the fire protection/emergency medical services system be continually evaluated and updated by the Fire Department in coordination with other City departments, as fire protection techniques, apparatus, needs and land use patterns change.
>
> *Fire Protection Policy 2*: It is the City's policy that the expansion of existing fire stations and the acquisition of new sites be planned and designed to minimize the displacement of housing and relocation of residents.
>
> *Fire Protection Policy 3:* It is the City's policy that public education activities concerning the elimination of fire hazards, methods of fire protection and emergency medical service be encouraged.
>
> *Fire Protection Policy 4:* It is the City's policy that the existing paramedic program be continually evaluated, updated and improved.
>
> *Fire Protection Policy 5*: It is the City's policy that the City intensify its program of fire protection through weed abatement.

b) Existing Conditions

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

The LAFD's 3,246 uniformed fire personnel protect life, property, and the environment through their direct involvement in fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A non-sworn cadre of 353 professional support personnel provide technical and administrative expertise in their corresponding pursuit of LAFD's mission. A total of 1,018 uniformed firefighters (including 270 serving as firefighter/paramedics), are on 24-hour duty at fire department facilities Citywide, including 106 neighborhood fire stations strategically located across LAFD's 471-square-mile jurisdiction.[14]

The "first-in" station for the Project Site is Fire Station No. 35, which is located at 1601 North Hillhurst Avenue, approximately 0.5 miles from the Project Site. As shown in **Table IV.L-1**, Fire Station No. 35 consists of an Assessment Light Force, Paramedic Rescue, Ambulance, Basic Life Support (BLS) Rescue Ambulance, and Brush Control.

As defined in LAFD's FireStatLA, the Citywide Operational Response Times are 6 minutes and 39 seconds for EMS, 6 minutes and 23 seconds for Non-EMS, 5 minutes and 42 seconds for Critical Advanced Life Support, and 5 minutes and 45 seconds for structure fire. The Operational Response times for LAFD stations located near the Project Site are provided in Table IV.L-1.[15]

The above discussion regarding response times is provided for informational purposes since LAFD has neither established response time standards for emergency response nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response. Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multilane 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, has developed a Fire Preemption System, a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response. The City of Los Angeles has over 205 miles of major arterial routes that are equipped with a Fire Preemption System.[16]

[14] Los Angeles Fire Department (LAFD), About LAFD, Our Mission, 2020.
[15] LAFD, FireStatLA, 2020.
[16] LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, October 2008.

According to the LAFD, although response time is considered to assess the adequacy of fire protection 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 response distance from existing fire stations, fire flow, and the LAFD's judgment for needs in an area.[17] 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 Section 35 and the *City of Hayward v. Board Trustee of California State University* (2015) ruling, the City has and will continue to meet its legal obligation to provide adequate public safety services, including fire protection services.

Table IV.L-1 identifies the LAFD stations located near the Project Site.

TABLE IV.L.1-1
LAFD STATIONS NEAR PROJECT SITE

No.	Location	Distance and Direction from Project Site[1]	Equipment and Services	24-hour Daily Staffing	Response Times for Emergency Medical Incident/ Non-Emergency Medical Service[2]
35	1601 N. Hillhurst Avenue	0.5 miles east	Assessment Light Force, Paramedic Rescue Ambulance, Basic Life Support (BLS) Rescue Ambulance and Brush Control	10	6:09/ 5:54
6	326 N. Vigil Avenue	1.8 miles southeast	Engine and Paramedic Rescue Ambulance	6	6:29/ 6:02
82	5769 W. Hollywood Boulevard	1.8 miles northwest	Engine and Paramedic Rescue Ambulance	6	6:42/ 6:21
52	4957 Melrose Avenue	2 miles southwest	Assessment Engine and Paramedic Rescue Ambulance	6	6:23/ 6:08
20	2144 Sunset Boulevard	2.4 miles southeast	Assessment Light Force, Paramedic Rescue Ambulance and BLS Rescue	10	6:29/ 6:03

SOURCE: K. Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, LAFD, January 14, 2019 (included as Appendix K-1 of this Draft EIR).
1 Distance measured from the nearest building site to each LAFD Station.
2 Response times are based on January–December 2019 data.

[17] Refer to Appendix K-1 of this Draft EIR.

(2) Emergency Access

According to the Safety Element, Sunset Boulevard, which bisects portions of the Project area, and Vermont Avenue, which is located on the Project's eastern boundary, are selected disaster routes. Emergency vehicles currently access the Project Site via local roadways. As described in the Transportation section of this Draft EIR (Section IV.M), key roadways providing vehicular access to the Project Site include the following:

- North–South Roads
  - – Alexandria Avenue
  - – Edgemont Street
  - – L Ron Hubbard Way
  - – New Hampshire Avenue
  - – Vermont Avenue
- East–West Roads
  - – Barnsdall Avenue
  - – Sunset Boulevard

(3) Fire Flow and Water Infrastructure

The Los Angeles Department of Water and Power provides water supply to meet fire-flow requirements in the City. Fire-flows are supplied by the same water mains as the domestic water system, including the lines located in local streets and major roadways. In general, fire-flow requirements are closely related to land use, as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as site location, building age or type of construction). City fire-flow requirements, as established in the Fire Code, vary from 2,000 gpm in low-density residential areas, to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The required fire flow for this Project has been set at 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously. Based on the required fire flow of 6,000 to 9,000 gpm, the first-due Engine Company should be within 1 mile, and the first-due Truck Company should be within 1.5 miles. There is an existing fire hydrant near Site 1 along Vermont

Boulevard. There are two fire hydrants near Site 5 at the Sunset Boulevard and Vermont Boulevard intersection—one at the northwest corner and one at the southwest corner. There are six fire hydrants along Sunset Boulevard— one at the corner of New Hampshire Avenue and Sunset Boulevard near Site 2, one near the 4733 Sunset Medical Office Building, two in front of 4867 Sunset Hospital, one at the corner of Edgemont near Site 3, and one at the corner of North Kenmore Avenue near Site 6. Additionally, there is one fire hydrant adjacent to Site 4 near the 1526 Edgemont Medical Office Building pedestrian bridge.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the 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 governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.***

This analysis relies upon the Appendix G thresholds. The analysis uses factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. The L.A. CEQA Thresholds Guide states that a project would have a significant impact on fire protection services 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

LAFD evaluates impacts to fire prevention and protection services on a project-by-project basis, taking into account service population, fire hydrant sizing and placement standards, distance for equipment and services, proposed land uses, required fire flow, project access points, and Project Design Features that would reduce or increase the demand for fire protection services. Based on these factors, a determination is made as to whether the LAFD would require a new or physically altered facility to maintain acceptable service levels, the construction of which could result in a potentially significant environmental impact. Consultation with the LAFD is also conducted to determine the project's effects on fire protection.

The need for, or deficiency in, adequate fire protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact.[18] 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 an EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection services from a project is determined by whether construction of new or expanded fire protection facilities is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the vicinity of the five stations serving the Project Site. Therefore, the City assumes, based on existing zoning standards and historical development of fire facilities, that in the event expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including the specific location of future expanded or new fire facilities, would be speculative and beyond the scope of this document.

c) Project Design Features

No specific Project Design Features are proposed with regard to fire protection services.

As discussed in Section IV.M, Transportation, of this Draft EIR, the Project also includes a Construction Staging and Traffic Management Plan (CSTMP) (Project Design Feature **PDF-TRF-1**), which would include provisions for maintaining emergency access to the Project Site during construction.

[18] *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal, App. 4th 833, 847.

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 governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

(1) Impact Analysis

(a) Construction

Construction activities associated with the Project may temporarily increase demand for fire protection services. Construction activities may involve the operation of construction equipment and machinery, storage, handling, and disposal of combustible materials, and the use of flammable or toxic materials.

To comply with Cal-OSHA and State and local Fire and Building Code requirements,, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on site. Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. City and State regulations and code requirements would, in part, require personnel to be trained in fire prevention and emergency response, maintenance for fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials. Thus, compliance with regulatory requirements would reduce the potential for construction activities to expose people to the risk of fire explosion related to hazardous materials.

Project construction could also impact the provision of LAFD services in the Project vicinity as a result of construction impacts around surrounding roadways. However, as discussed in Section IV.M, Transportation, of this Draft EIR, the Project would implement a CSTMP (Project Design Feature **PDF-TRF-1**), including street closure information, detour plans, and staging plans, which Kaiser Permanente would prepare and submit to the City for review and approval. The CSTMP would formalize how construction is to be carried out and identify specific actions that are required to reduce traffic impacts on the surrounding community. The CSTMP (Project Design Feature **PDF-TRF-1**) would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). With the implementation of Project Design Feature **PDF-TRF-1**, the Project would not

impair the roadways within the vicinity of the Project Site. Furthermore, Section 21806 of the California Vehicle Code allows drivers of emergency vehicles to have a variety of options for avoiding traffic, such as using sirens to clear a path of travel and driving in the lanes of opposing traffic.

Based on these considerations, construction of the Project would not be considered a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires, should they occur. Due to compliance with applicable codes and fire safety standards, Project construction is not expected to adversely impact firefighting services to the extent that there would be a need for the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain acceptable fire protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, impacts associated with construction of the Project on fire protection services would be less than significant.

(b) Operation

The analysis of the Project's potential impacts on LAFD services addresses potential impacts of the proposed Project on existing LAFD facilities and equipment, response distance, emergency access, and fire flow.[19]

(i) Facilities and Equipment

The Project Site is expected to continue to be served by Fire Station No. 35, the "first-in" station for the Project Site, located at 1601 North Hillhurst Avenue, 0.5 miles east of the Project Site. In addition, as shown in Table IV.L.1-1, Fire Station Nos. 6, 82, 52, and 20 are located between 1.8 and 2.4 miles of the Project Site.

The Project would include new and replacement medical office buildings, procedure centers, and parking structures on the Project Site. The LAFD ensures that new development complies with California Building Standards Code, Chapter 7 and 7A, and the California Fire Code (24 CCR, Part 9). New construction would also be required to conform to Office of Statewide Health Planning and Development (OSHPD) standards. Buildings would be required to install fire prevention devices, such as fire alarms and sprinklers, in order to improve emergency-related problems for the proposed development. As part of the standard development practices, Project plans would be reviewed by OSHPD and LAFD.

[19] Refer to Appendix K-1.

Project employment could result in slight residential population growth within the LAFD's jurisdiction. As discussed in further detail in Section IV.K, Population and Housing, of this Draft EIR, the Project would result in 1,807 new employees by 2030 buildout.[20] Conservatively assuming that all new employees of the Project are not currently residents in the City and would become new residents of the City, the Project increase the population by 1,807 persons. Therefore, the Project may result in the need for increased staffing of existing facilities. However, the Project would implement Los Angeles Building Code and Fire Code requirements including regulations for structural design, building materials, site access clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communication systems, and building sprinkler systems. Compliance with these requirements would be demonstrated in the plot plans submitted to LAFD for review prior to issuance of building permits in accordance with City regulations. Further, although the average response times discussed in Table IV.L-1 for LAFD fire stations in the Project vicinity and Citywide do not meet the NFPA response time standards, LAFD has not formally adopted the NFPA standards, and the current average response times would not be considered deficient. Compliance with Los Angeles Building Code and Fire Code requirements would ensure that adequate fire prevention features are provided, which would reduce the demand on LAFD facilities and equipment.

(ii) Response Distance

The nearest fire stations with an Engine and Paramedic Rescue Ambulance are Station Nos. 6 and 82, both of which are approximately 2 miles from the Project Site. The nearest fire stations with Assessment Light Force, Paramedic Rescue Ambulance, and BLS Rescue are Station Nos. 35 and 20, located approximately 0.5 miles and 2.4 miles from the Project Site, respectively. Based on the required fire flow of 6,000 gpm and 9,000 gpm, the first engine company should be within 1 mile of the Project Site, and the first truck company should be within 1.5 miles of the Project Site. As the station within 0.5 miles of the Project Site contains Assessment Light Force, Paramedic Rescue Ambulance, and BLS Rescue, the Project would meet the truck company maximum distance requirement. However, since the closest stations with an engine company—Stations Nos. 6 and 83—would be located within 1.8 miles of the Project Site, the Project would not meet the response distance for first engine companies. If the response distance standard cannot be achieved for a specific location, then fire sprinkler systems and any additional equipment or systems (e.g., fire hydrants, fire signaling systems, fire extinguishers, smoke removal systems, etc.) shall be deemed necessary by the Fire Chief pursuant to LAMC Section 57.507.3.3. For these reasons, the Project would be required to install a fire sprinkler system. Nonetheless, LAFD determined fire protection would be considered adequate for the Project (refer to Appendix K-1).[21]

[20] M. Hesse, A0147: LAMC Aesthetics – Net Growth Staff Increase, June 3, 2019.
[21] Crowley, LAFD, January 14, 2019 (included as Appendix K-1 of this Draft EIR).

As previously discussed, the LAFD's ability to provide adequate fire protection and services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion and intersection LOS along the response route. Project implementation would not alter roadway configurations in the Project area or otherwise increase response distances for Fire Stations serving the Project Site.

(iii) Emergency Access

During the plan check phase of the Project, the LAFD would review the Project for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and NFPA standards. Additionally, OSHPD would review new construction for egress. The LAFD would not approve permits unless emergency access meets its standards, thereby ensuring that the Project would not create any undue fire hazard. The Project involves the demolition of existing structures and construction of medical office buildings, parking structures, and associated improvements. Access to the Project Site would be designed according to City standards and all applicable emergency access standards. As described above under Existing Conditions, vehicular access to the Project Site, including access for emergency vehicles, would be provided via Alexandria Avenue, Edgemont Street, L Ron Hubbard Way, New Hampshire Avenue, Vermont Avenue, Barnsdall Avenue, and Sunset Boulevard. Operation of the Project would not include barriers (e.g., perimeter fencing, fixed billboards) that would impede emergency vehicle access to the Project Site and in the Project vicinity. As such, emergency access to the Project Site would be maintained at all times. Pursuant to LAMC Section 57.106.5.2, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate LAFD response to the Project Site. Kaiser Permanente would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, State, and/or federal requirements related to emergency access and evacuation plans.

(iv) Fire Flow

Prior to construction of the Project, the Water Operations Division of the Los Angeles Department of Water and Power would perform a detailed fire-flow study at the time of plan check in order to ascertain whether further water system or site-specific improvements would be necessary. The LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and NFPA standards, thereby ensuring that the Project would not create any undue fire hazard. According to the LAFD, the Project is required a fire flow of 6,000 gpm to 9,000 gpm from four to six fire hydrants flowing simultaneously. Fire hydrants spacing and type

would be installed per LAMC Section 57.507.3.2. The Project would install these fire hydrants, as necessary, within the public right-of-way to meet City fire flow requirements contained in LAMC Section 57.507.3.1.

(c) Conclusion

Based on the above, Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, compliance with State regulatory requirements would reduce the potential for construction activities to expose people to the risk of fire explosion related to hazardous materials. Additionally, the Project would implement a CSTMP (Project Design Feature **PDF-TRF-1**), including street closure information, detour plans, and staging plans, to ensure construction of the Project would not impair the roadways in the vicinity of the Project Site. **Due to compliance with applicable codes and fire safety standards, Project construction is not expected to adversely impact firefighting services to the extent that there would be a need for the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain acceptable fire protection services, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, impacts associated with construction of the Project on fire protection services would be less than significant.**

The proposed Project would result in an increase in employees, which could potentially impact the existing fire protection facilities. However, the proposed Project would comply the Los Angeles Building Code 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 communication systems, and building sprinkler systems. Further, the LAFD would review the Project's site plan prior to Project approval to ensure the Project complies with City regulations. **Project operation would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility, the construction of which would cause significant environmental effects, in order to maintain service and would not inhibit LAFD emergency response. Therefore, Project impacts to fire protection and emergency services would be less than significant.**

(2) Mitigation Measures

Impacts regarding fire protection facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding fire protection facilities 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

As indicated in Chapter III, Project Description, of this Draft EIR, there are 85 related projects in the vicinity of the Project Site. A cumulatively significant impact related to fire protection services could occur as a result of population growth within the LAFD service area due to the Project and related projects. A number of related projects that could increase population growth include apartments, retail, restaurant, hotel, condominiums, and office uses. Project employment could result in slight residential population growth within the LAFD's jurisdiction. The Project, along with the related projects, would contribute towards a substantial or significant growth as compared to projected growth for the City. For the reasons discussed below, if any of the related projects creates demands on fire protection staffing, equipment, or facilities such that development of a new or expanded station would be required, potential environmental impacts would, be addressed and mitigated in conjunction with the environmental review for that specific project, just as they are for this Project.

The Project, along with related projects, could result in increased calls for fire protection services. However, both the Project and related projects would be subject to the requirements of Angeles Fire Code, including to LAMC Section 57.507.3.3, which mandates the installation of automatic fire sprinkler systems if a project is located at a distance that exceeds the LAFD required response time. Furthermore, the Project and related projects would be required to consult with LAFD and Los Angeles Department of Water and Power during the plan check phase to ensure fire flow requirements are met and any required upgrades to the existing water distribution system are addressed for each individual project. The Project and each of the related projects also would be individually subject to LAFD review and would be required to comply with all applicable LAFD, Department of Building and Safety, and other City fire safety requirements, including hydrant and access improvements, if necessary, to adequately mitigate fire protection impacts. Because the Project would not create such demands, and since the Project would be required to comply with regulatory requirements related to fire protection, its contribution to these impacts is not cumulatively considerable.

Finally, cumulative increases in demand for fire protection services due to related projects would be identified and addressed through the City's annual budgeting process. As discussed in Chapter 6 Revenue Funds, of the City's Charter, property taxes, business taxes, etc. collected within the City would be applied towards three City's General Fund. Funding to fire facilities is required under the City Charter to be funded by property taxes. The new developments associated with the Project and related projects would generate revenues to the City's General Fund through property taxes, business taxes, etc. that could potentially be applied toward the provision of new fire protection facilities, as deemed appropriate. Over time, the 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. The LAFD continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. 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. Therefore, these revenues to the General Fund would help offset the increase potential increases in fire protection services as a result of the Project and related projects.

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), the obligation to provide adequate fire protection medical 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 that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

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

(2) Mitigation Measures

Cumulative impacts related to fire protection facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts with regard to fire protection facilities 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.