IV. Environmental Impact Analysis

J.1. Public Services – Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning August 21, 2019, which is included in **Appendix I** of this Draft EIR; and the *Morrison Hotel Project, Utility Infrastructure Technical Report: Water* ("Water Report") [1] prepared for the Project by KPFF Consulting Engineers, September 23, 2020, which is included in **Appendix H.1** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

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

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

[1] *KPFF Consulting Engineers, Morrison Hotel Project, Water Report for APNs 5139-022-003, 5139-022-004, 5139-022-020, 5139-022-006, and 5139-022-02, 1220-1246 South Hope Street and 427-435 Pico Boulevard, Los Angeles, California, 90015, September 23, 2020.*

- City of Los Angeles General Plan Safety Element
- Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and state Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(b) Federal Emergency Management Act (FEMA)

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

(c) Disaster Mitigation Act of 2000

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

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements

- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

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

(2) State

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by State agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.[2] 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.[3]

(b) California Fire Service and Rescue Emergency Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[4] 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

[2] *California Building Code (CCR, Title 24, Part 2).*
[3] *Los Angeles Fire Department, Mutual Aid Agreements/Disaster Declarations/Potential Fiscal Impacts, July 3, 2014.*
[4] *Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.*

mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.[5]

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.[6] This section of CVC states the following:

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

(d) California Constitution Article XIII, Section 35

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

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

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

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

(e) California Governor's Office of Emergency Services

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

(3) Local

(a) City of Los Angeles Charter

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

(b) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in **Table IV.J.1-1, Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies**. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure.[7] Objective 9.16 requires that the demand for existing and projected

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

fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.[8] This is consistent with the specifications for response distances within the LAMC.

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

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

(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, as shown in **Table IV.J.1-2, Relevant General Plan Safety Element Goals, Objectives, and Policies**. In addition, the City's Safety Element designates disaster routes.

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

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

Safety Element	
Goal 2	A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Response: Develop, implement, and continue to improve the City's ability to respond to emergency events. [All EOO emergency response programs and all hazard mitigation and disaster recovery programs related to protecting and reestablishing communications and other infrastructure, service and governmental operations systems implement this policy.]
Policy 2.1.6	Standards/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, and clearances around structures) and other requirements or procedures related to fire suppression implement this policy.] The Fire Department and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for location and expansion of fire facilities, based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical event response. At a minimum, site selection criteria should include the following standards which were contained in the 1979 General Plan Fire Protection and Prevention Plan: Fire stations should be located along improved major or secondary highways. If, in a given service area, the only available site is on a local street, the site must be on a street which leads directly to an improved major or secondary highway. Fire station properties should be situated so as to provide drive-thru capability for heavy fire apparatus. If a fire station site is on the side of a street or highway where the flow of traffic is toward a signalized intersection, the site should be at least 200 feet from that intersection in order to avoid blockage during ingress and egress. The total number of companies which would be available for dispatch to first alarms would vary with the required fire flow and distance as follows: (a) less than 2,000 gpm would require not less than 2 engine companies and 1 truck company; (b) 2,000 but less than 4,500 gpm, not less than 2 or 3 engine companies and 1 or 2 truck companies; and (c) 4,500 or more gpm, not less than 3 engine companies and 2 truck companies. These provisions of the 1979 Plan were modified by the Fire Department for purposes of clarification.

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

Safety Element	
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster. [All EOO recovery programs involving cooperative efforts between entities implement this policy.]
Source: City of Los Angeles, General Plan Safety Element, 1996.	

(d) Central City 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 boundary of the Central City Community Plan. The Central City Community Plan contains the following fire protection objectives and policies applicable to the Project in Chapter III, Land Use Policies and Programs, Fire Protection:[9]

> **Objective 6.1:** To ensure that fire facilities and protective services are sufficient for the existing and future population and land uses of Central City.
>
> **Policy 6.1.1:** Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

[9] *Los Angeles City Department of Planning, Central City Community Plan.*

(e) Los Angeles Municipal Code

The Los Angeles Fire Code (LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code and the International Fire Code. The City's Fire Code sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials. Specific regulations regarding fire prevention and protection are discussed below.

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

Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: LAFD communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

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

Section 57.118.1.1 requires that all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) must include fire/life safety reviews by the Department of Building and Safety and LAFD.

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

Section 57.4704.5.1 of the LAMC requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

Section 57.4705.1.6 requires there must be at least one elevator which shall be available for fire EMS and shall have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floors. The elevator or elevators must be interconnected with the standby power.

Section 57.4705.4 requires each building to have a rooftop emergency helicopter landing facility in a location approved by the Chief, unless certain life safety features, as specified in LAFD Requirement No. 10, are provided and approved by the Fire Marshal in compliance with two options.

Section 57.503.1.4 requires an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway.

Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required), with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved hydrant. The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development.

Section 57.507.3.3 limits the maximum response distances to an LAFD station based on the type of land use. Applicable distances are based on LAFD's comment letter for each individual project.

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

(f) Propositions F and Q

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

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

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

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.[12]

(g) Measure J

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

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

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

b) Existing Conditions

(1) Project Site

The Project Site is located in a highly urbanized area on the northeast corner of Hope Street and Pico Boulevard and is currently developed with commercial industrial buildings and an existing, vacant hotel with associated surface parking lot. Emergency access to the Site is available from existing driveways on Hope Street and Pico Boulevard and the surface parking lot entry at Pico Boulevard. There is also a two-way alley on the eastern boundary of the Project Site. Although the Site perimeter along Hope Street and Pico Boulevard is planted with street trees, no wildlands

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

are present on the Project Site or in the surrounding area. Furthermore, the Project Site is not within a City-designated wildfire hazard area[13] or a Very High Fire Hazard Severity Zone.[14]

(2) Fire Protection Facilities and Services

Fire prevention, fire suppression, and life safety services in the City are provided by the LAFD. The LAFD has 3,246 uniformed fire personnel and 353 non-uniformed professional support staff.[15] Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. As of July 2019, a professionally trained staff of 1,018 uniformed firefighters (including 270 paramedic-trained personnel) are on duty at all times at 106 neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.[16]

The Project Site is located within LAFD's Central Bureau which is broken down into three battalions (Battalions 1, 2, and 11) which include 22 fire stations and 645 personnel.[17] There are eight LAFD fire stations located within a two-mile radius of the Project Site as shown in **Figure IV.J.1-1, Fire Station Location Map**. **Table IV.J.1-3, Fire Stations Serving the Project Site,** presents the Fire Stations, distance to Project Site, staffing levels, and apparatus. As shown in **Table IV.J.1-3**, the primary station serving the Project Site is Fire Station No. 10 located at 1335 S. Olive Street, approximately 0.3-mile to the south of the Project Site. Fire Station No. 10 has 14 staff members and includes a Paramedic Rescue Ambulance, a Basic-Life-Support (BLS) Rescue Ambulance, and an Assessment Light Force. The secondary stations that could respond to the Project Site are Station Nos. 9, 11, 15, and 4.

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

Fire Station and Address	Distance to Project Site (miles)	Staff	Equipment & Services
Fire Station No. 10 1335 S. Olive Street	0.3 S	14	Paramedic Rescue Ambulance, BLS Rescue Ambulance, Assessment Light Force
Fire Station No. 9 430 E. 7th Street	1.3 E	19	2 Assessment Engines, BLS Truck, 2 Paramedic Rescue Ambulances, BLS Rescue Ambulance, Fast Response Unit
Fire Station No. 11 1819 W. 7th Street	1.7 NW	14	Paramedic Rescue Ambulance, BLS rescue ambulance, Assessment Light Force, Assessment Engine
Fire Station No. 15 3000 Hoover Street	2.0 SW	14	Engine, Assessment Light Force, Paramedic Rescue Ambulance
Fire Station No. 4 450 E. Temple Street	2.4 NE	11	Assessment Engine, Paramedic Rescue Ambulance, EMS Battalion Captain, BLS

[13] *City of Los Angeles, Department of City Planning, Safety Element of the Los Angeles City General Plan, adopted November 26, 1996, Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles, https://planning.lacity.org/cwd/gnlpln/saftyelt.pd. Accessed May 1, 2018.*
[14] *City of Los Angeles, Zoning Information and Map Access System (ZIMAS) Website, Accessed April 27. 2018.*
[15] *Los Angeles Fire Department, Our Mission Website, Accessed July 9, 2019.*
[16] *Los Angeles Fire Department, Our Mission Website, Accessed July 9, 2019.*
[17] *Los Angeles Fire Department, Central Bureau Website, Accessed July 9, 2019.*

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

Fire Station and Address	Distance to Project Site (miles)	Staff	Equipment & Services
			Rescue Ambulance

Notes: S = South; E = East, NW = northwest; SW = southwest; NE = northeast; BLS = basic life support; EMS = emergency medical services
*Sources: Kristen Crowley, Fire Marshal, City of Los Angeles, Fire Department, Bureau of Fire Prevention and Public Safety, Inter-Departmental Correspondence, August 21, 2019. Refer to **Appendix I** of this Draft EIR.*

(3) Response Distance and Time

(a) Response Distance

The Fire Code specifies maximum response distances allowed between specific locations and engine/truck companies, based on land uses and fire flow requirements. As previously identified, pursuant to LAMC Section 57.507.3.3, the maximum response distance between high-density residential neighborhood commercial land uses (as the Project's water report has classified the Project) to a fire station that houses an engine company is 1.5 miles, and the maximum response distance to a fire station that houses a truck company is two miles (both the engine and truck company requirements apply to the Project).[18] The nearest fire station with an engine company is Fire Station No. 9, located at 430 E. 7th Street, approximately 1.3 miles to the southwest of the Project Site, within the engine company distance criterion. The nearest fire station with a truck company (referred to as a "Light Force" if operating one engine or a "Task Force" if operating two engines) is Fire Station No. 11, located at 1819 W. 7th Street, approximately 1.7 miles to the northeast of the Project Site, within the truck company distance criterion.

(b) Response Time

Response time relates directly to the physical linear travel distance (i.e., the number of roadway-miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site.

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

1: Fire Station 10, 1335 S. Olive Street
2: Fire Station 9, 430 E. 7th Street
3: Fire Station 11, 1819 W. 7th Street
4: Fire Station 15, 3000 Hoover Street
5: Fire Station 3, 108 N. Fremont Street
6: Fire Station 13, 2401 W. Pico Boulevard
7: Fire Station 14, 3401 S. Central Avenue
8: Fire Station 4, 450 E. Temple Street

Project Site

Source: GoogleMaps, July 2019.

No Scale

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

Thus, roadway congestion, intersection level of service, weather conditions, and construction traffic along the response route can affect the response time. The LAFD created FireStatLA in 2014 to track and evaluate response time data in order to improve response times citywide. **Table IV.J.1-4, Average EMS and Fire Response Times**, presents the average response times for the primary and secondary fire stations serving the Project Site based on FireStatLA response metrics from January through June 2019. As shown in **Table IV.J.1-4**, the response times for the fire stations identified as serving the Project Site are less than the Citywide average of 6:38 minutes for EMS calls and 4:59 minutes for structure fires.[19]

Table IV.J.1-4
Average EMS and Fire Response Times

Fire Station	Average Response Time to EMS Incident (minutes:seconds)	Average Response Time to Structure Fire Incident (minutes:seconds)
Fire Station No. 10	6:26	4:50
Fire Station No. 9	5:57	4:14
Fire Station No. 11	6:08	4:18
Fire Station No. 15	6:29	4:27
Fire Station No. 4	6:23	4:40
Citywide	6:38	4:49
Source: Los Angeles Fire Department, FireStatLA website: https://lafd.org/fsla/stations-map, accessed: July 9, 2019.		

The response times for the stations serving the Project Site shown in Table IV.J.1-2 are for informational purposes only since LAFD has not formally established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standards of 5 minutes for EMS response and 5:20 minutes for fire suppression response (as established for fire department turnout time and travel time, which does not include call intake, processing, or transfer, or dispatch).[20] 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 fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847 ruling, the City has and will continue to meet its legal constitutional obligations to provide adequate public safety services, including fire protection and emergency medical services. 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

[19] *LAFD FireStatLA Website, accessed July 9, 2019.*

[20] *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.*

streets to aid in emergency response.[21] The City has over 205 miles of major arterial routes that are equipped with FPS.[22]

(4) Fire Flow

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for fire flow to the Project Site. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). As previously detailed, in accordance with Section 57.507.3.1 of the LAMC, the Project Site requires 4,000 gpm from four adjacent hydrants flowing simultaneously, which translates to 1,000 gpm flowing from each hydrant and a minimum residual pressure of 20 psi. An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR shows four nearby hydrants flowing simultaneously, are able to deliver 1,500 gpm each with a residual pressure 44-46 psi. As shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3.1 of the LAMC.[23]

As previously identified, pursuant to LAMC Section 57.09.06, hydrants in high-density residential and commercial locations, such as the Project Site, must serve a net land area of 100,000 square feet. Additionally, there must be a distance of 300-450 feet between hydrants on roads and fire lanes and 2.5-inch by 4.0-inch double fire hydrants must be used. The Project Site is less than 100,000 square feet and there are multiple hydrants in the area including: one in the west corner of the Project Site, on the east corner of the intersection of W. Pico Boulevard and S. Hope Street; one directly across S. Hope Street, mid-block between W. Pico Boulevard and W. 12th Street; one hydrant on the north corner of the intersection of W. Pico Boulevard and S. Hope Street; one hydrant on the south corner of the intersection of W. Pico Boulevard and S. Hope Street; and several others within both the immediate and greater vicinity of the Project Site.[24] The hydrants currently serving the Project Site comply with LAMC Section 57.09.06.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State *CEQA Guidelines* Appendix G (Appendix G), the Project could have a significant impact related to fire service if it were to:

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[21] *Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet Website, accessed: July 9, 2019.*

[22] *Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.*

[23] *KPFF Engineering Consultants, Morrison Hotel Project Utility Infrastructure Technical Report: Water, Exhibit 2, August 2, 2019.*

[24] *City of Los Angeles Geo Hub, fire hydrant locations Interactive Website, accessed June 2, 2018.*

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

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

Fire Protection

- *If the Project would require 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. In accordance with standard LAFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, and hydrant and access improvements. The LAFD does not determine the adequacy of fire protection based on response times or number of emergency medical services (EMS) or fire-related incidents. The following discussion addresses the Project's potential impacts on fire protection services based on these criteria. 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 was also conducted to determine the Project's effect on fire protection and emergency medical 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.[25] Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection and emergency medical services from a project is determined by whether construction of new or expanded fire protection and emergency medical facilities is reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire and emergency facilities, that in the event the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that

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

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 Negative Declaration, or Mitigated Negative Declaration.

c) Project Design Features

No project design features are proposed with regards to fire services.

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, 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

The Project is a mixed-use development and does not involve the construction or physical alteration of a fire station.

Construction on the Project Site would increase the potential for accidental fires from sources such as mechanical equipment and flammable construction materials. Given the nature of construction activities and the work requirements of construction personnel, Occupational Safety and Health Administration (OSHA) has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by Cal/OSHA.[26] Additionally, in accordance with the provisions established by Cal/OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[27] The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, State, and federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the RWQCB, which would ensure that wastes generated during the construction process are disposed of properly. Compliance with these regulatory requirements would effectively reduce the potential for Project

[26] *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention Website, accessed July 10, 2019.*

[27] *United States Department of Labor, Occupational Safety & Health Administration, Title 29 Code of Federal Regulations, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention.*

construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. The Project would be required to prepare a Construction Management Plan (see TR-PDF-1 in **Section IV.K, Transportation** of this Draft EIR) that would address traffic and access control during construction. As detailed in TR-PDF-1, emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD. Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel and driving in the lanes of opposing traffic pursuant to CVC Section 21806 or utilizing the FPS lights. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete.

Moreover, construction impacts are temporary in nature and do not cause lasting effects that would impact LAFD fire protection services. Accordingly, Project construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain response distances, emergency access, or other performance objectives of the LAFD.

Given the short-term nature of construction, the low number of expected calls for service due to the controlled nature of the construction activities, and the multiple fire stations that are readily available to serve the Project Site, Project construction would not require the provision of or need for new or altered fire protection facilities, in order to maintain acceptable fire services. Therefore, impacts on the fire services would be less than significant.

(b) Operation Impacts

The Project would include residential and commercial uses, which would not create unique fire response demands compared to more potentially hazardous uses such as industrial uses. The Project would comply with the LAMC Building and Fire Codes, and other applicable fire protection requirements, including but not limited to: the provision of fire resistant doors, materials, walkways, stairwells, and elevator systems (including emergency and fire control elevators); installation of automatic fire sprinkler suppression systems (with sprinklers provided on all floors), smoke detectors, signage, fire alarms, building emergency communication systems, smoke control systems; implementation of an Emergency Safety Plan; compliance with LAFD fire apparatus and personnel access requirements; water system and roadway improvements made to the satisfaction of the LAFD; and LAFD review and approval of definitive plans and specifications. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit.

The City evaluates the adequacy of fire services on the basis of required distance from fire stations and required fire-flow.

(i) Locations of Fire-Fighting Facilities and Equipment

The Project Site is expected to continue to be served by Fire Station No. 10, with Fire Station Nos. 9, 11, 15, and 4 expected to continue to be available to serve the Project Site as necessary. As previously detailed, the Project Site would be within the LAMC Section 57.507.3.3's maximum 1.5-mile fire response distance for an engine company and 2-mile response distance for a truck company for land uses within the high-density residential neighborhood commercial category, which the LAFD has determined is applicable to the Project. Furthermore, as the response time for EMS and fire calls at Fire Station No. 10 and secondary support stations are comparable to the Citywide averages, the Project would be adequately served by existing fire protection services. Accordingly, the LAFD has determined, based on response distance from existing stations, fire protection for the Project would be considered adequate.[28]

Access to the Project Site is not impeded by any of the factors that could adversely affect firefighting services in the Project vicinity. The Project Site is located outside of hazardous/hillside areas. Because of the grid pattern of the local street system and the proximity to multiple freeways, each of the nearby fire stations has multiple routes available to respond to emergency calls at the Project Site. Further, the LAFD has been upgrading its service capabilities including: installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic unmanned aerial systems.[29]

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site. The Project would provide LAFD site/building access, and emergency directional signage required by both the LAMC Building and Fire Codes. All internal circulation improvements, such as parking garage ingress/egress, would be required to comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times. While helicopter landing facilities are required on all high-rise buildings in the City (LAFD Requirement No. 10) the Fire Prevention Bureau's Requirement 10 for Emergency Helicopter Landing Facilities (EHLF) allows for two alternatives to a fully FAA-approved landing facility. As detailed in PDF FIR-3, the Project would comply with LAMC Section 57.4705.4 and LAFD Requirement No. 10 (discussed in greater detail below), as well as all State and local building codes relative to fire protection, safety, and suppression, including those standards and requirements as set forth by Title 24 of the California Code of Regulations, the Safety Element, and the Fire Code. In addition, upon completion of the Project and pursuant to LAMC Section 57.106.5.2, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional

[28] *Kristen Crowley, Fire Marshal, City of Los Angeles, Fire Department, Bureau of Fire Prevention and Public Safety, Inter-Departmental Correspondence, August 21, 2019.*

[29] *City of Los Angeles, Fire Department, 2018-2020 Safer City Strategic Plan.*

information that may facilitate LAFD response to the Project Site. Based on the Project's proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls without issue.

(ii) Fire Flows and Water Facilities

As described in Section **IV.J.2, Utilities and Service Systems**, 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, Section 57.507.3.1 of the LAMC establishes fire flow standards by development type. As determined by the LAFD, the Project requires 4,000 gpm from 4 adjacent hydrants flowing simultaneously with a minimum residual water pressure of 20 psi.[30] Additionally, hydrants must be spaced to provide adequate coverage of the building exterior, as set forth in Section 57.507.3.2 of the LAMC, and must deliver a minimum pressure of 20 psi at full flow. An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. As detailed above, the completed IFFAR shows four nearby hydrants flowing simultaneously that are able to each deliver 1,500 gpm with a residual pressure of 44-46 psi for a total of 6,000 gpm. Accordingly, adequate fire flow is available to serve the Project in compliance with Section 57.507.3 of the LAMC. The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Project Site.

Furthermore, the Project would be required to comply with emergency helicopter landing facility requirements of the LAMC and LAFD. Pursuant to LAMC Section 57.4705.4 and LAFD Requirement No. 10, high rise buildings are required to install emergency helicopter landing facilities. However, in lieu of such landing facilities, high rise buildings greater than 120 feet but less than 240 feet (the 191-foot Hotel Expansion) and greater than 240 feet but less than 420 feet (the 328-foot Hotel/Residential Tower) may alternatively install the following additional life safety features:[31]

- Two fire service access elevators as required in the 2013 California Building Code 403.6.1;
- Two stairways with roof access through a penthouse that complies with the 2014 Los Angeles Building Code Section 91.1509.2;
- Enclosed elevator lobbies in accordance with 2014 Los Angeles Fire Code Section 57.4705.1;
- Escalator openings or stairways that are protected by approved power-operated automatic shutters at every penetrated floor, if they are not part of the means of egress system and connect to more than two stories, in conformance with 2014 Los Angeles Building Code Section 91.712.1.3.2;

[30] *Kristen Crowley, Fire Marshal, City of Los Angeles, Fire Department, Bureau of Fire Prevention and Public Safety, Inter-Departmental Correspondence, August 21, 2019.*

[31] *Los Angeles Fire Department, Office of the Fire Marshal, Los Angeles Fire Department Requirement No. 10, revised November 17, 2014.*

- A Video Camera Surveillance System with cameras located in all firefighter elevator vestibules and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shafts, with an additional camera at the top of the exit stairway shaft; and
- An automatic sprinkler system installed throughout the building, designed in accordance with Section 57.903.3.1 of the Los Angeles Fire Code; 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 Project would provide an alternative pursuant to Regulation 10 upon demonstration that it meets the required sprinkler and other building design requirements. Installation of all water meters would be done by LADWP and would include new hot taps, laterals, and detector checks for the meter. Fire service water would be piped into the building from the meter. Backflow preventers, fire water tanks and fire pumps would be documented on the plumbing drawings, prepared at the time the building design is submitted to the City and LAFD for review.

(iii) Conclusion

As mentioned above, correspondence with the LAFD is based on its review of the Project. It elaborates on the regulatory requirements and provides guidance regarding their application the Project. Based upon the accessibility of the Project Site, and the applicability of regulatory requirements per guidance of the LAFD, the LAFD has determined that fire protection resources for the Project are considered "adequate."[32]

Therefore, the Project would not create the need for new or expanded fire department facilities that might cause significant environmental impacts. Therefore, impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Impacts regarding fire protection services were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

The geographic scope of the cumulative fire protection is the service areas of the LAFD stations that would serve the Project, specifically Fire Stations Nos. 10, 9, 11, 15, and 4. Related Projects identified for use in the cumulative analysis are listed in **Section III, Environmental Setting**, and

[32] *Kristen Crowley, Fire Marshal, City of Los Angeles, Fire Department, Bureau of Fire Prevention and Public Safety, Inter-Departmental Correspondence, August 21, 2019.*

shown in **Figure III-5** of this Draft EIR. It is anticipated that the additional population and commercial activity would increase the demand for fire protection in the service areas for LAFD Fire Stations in the downtown area. As such, correspondence with the LAFD stated that cumulative development of the Project and other Related Projects in the vicinity "may result in the need for… [i]ncreased staffing for existing facilities, [a]dditional fire protection facilities, and [r]elocation of present fire protection facilities."[33]

(1) Impact Analysis

The Project, in combination with the construction and operation of the Related Projects located within the service areas of these stations, would result in additional residential and commercial land uses within these service areas. The increase in development and residential service population from the Project and Related Projects would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the Related Projects would be reviewed on a project-by-project basis by the LAFD to ensure compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services. Project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD, are expected to help support adequate response times. Furthermore, as shown on **Figure III-5**, the Related Projects are located throughout the Downtown and the service areas of the Fire Stations that serve the Downtown, specifically Station Nos. 10, 9, 11, 15, and 4. Given the distribution of the Fire Stations, the Related Projects would generally be located within 1 mile of first-in truck and/or engine companies; and otherwise within 1.5 miles. As such, the Related Projects would generally be located within acceptable distances of the Fire Stations; and would be readily accessible to them. Additionally, in accordance with LAMC 57.507.3 requirements, if a Related Project would not be within the acceptable distance from a fire station, that Related Project would be required to install an automatic fire sprinkler suppression system to comply with response distance requirements.

In addition, as set forth in Section 57.118 of the LAMC, each Related Project would also be subject to the City's routine construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. If Project construction were to occur concurrently with the construction of Related Project Nos. 41, 43, 59, 70, 77, 78, 111, or 172, which are all located within approximately 500 feet of the Project Site, then specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan (pursuant to PDF TR-1, in **Section IV.K, Transportation**, of this Draft EIR) which would include provisions for maintaining safety and emergency access to the adjacent rights-of-way during construction.

Furthermore, 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

[33] *Kristen Crowley, Fire Marshal, City of Los Angeles, Fire Department, Bureau of Fire Prevention and Public Safety, Inter-Departmental Correspondence, August 21, 2019.*

Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(d) above, the obligation to provide adequate fire protection and emergency medical service is the responsibility of the City. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new stations construction that may become necessary to achieve desired levels of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City's General Fund. The Project, as well as the Related Projects, would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of fire services, as deemed appropriate by the City.

LAFD has no known or proposed plans to expand their fire protection facilities within the Central City community at this time; however, if a new fire station, or the expansion, consolidation, or relocation of a station was determined to be warranted by LAFD, the Downtown area is highly developed and any potential future site for a fire station would foreseeably be an infill lot less than an acre in size. As such, the development of such a station is unlikely to result in significant impacts. However, if LAPL 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 expected to be located on parcels that are infill opportunities on lots that are typically between approximately 0.5 to 2 acres in size, and (3) would likely qualify for a Categorical Exemption under CEQA Guidelines Section 15301 or 15332, Negative Declaration or Mitigated Negative Declaration and would not be expected to result in significant impacts. Accordingly, the potential need for additional fire protection services is not an environmental impact that the Project would be required to mitigate.

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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