IV. Environmental Impact Analysis

H.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR provides an analysis of the Project's potential impacts on fire protection services. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site and considers factors used by the Los Angeles Fire Department (LAFD) to determine the adequacy of fire protection for a given area, including fire flow requirements, response distance from existing fire stations, and LAFD's judgment for needs in the area. Emergency access to the Project Site and surrounding uses is also considered. This analysis is based, in part, on information available on LAFD's website, written correspondence from the LAFD Bureau of Fire Prevention and Public Safety (July 12, 2019) included in Appendix G, and the *Water, Sewer, and Energy Infrastructure Assessment Report*, prepared for the Project by Fuscoe Engineering, Inc., dated February 2020 (Utility Report), which is included in Appendix J of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Federal

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

(2) State

(a) California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including fire safety standards for new buildings, which are provided in the California Fire Code (CCR, Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.[1] The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2019 California Fire Code also went into effect on January 1, 2020.[2] Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.

(b) California Vehicle Code

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

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain*

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1 *California Building Code (CCR, Title 24, Part 2).*

2 *California Fire Code, (CCR, Title 24, Part 9).*

3 *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.*

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…. (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.

(c) California Constitution Article XIII, Section 35

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

In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[4]

(3) City of Los Angeles

(a) City of Los Angeles Charter

Section 520 of the City's 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.

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

(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 and defines citywide policies regarding land use, including infrastructure and public services. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood have the necessary level of fire protection service, emergency medical services, and infrastructure.[5] 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 services, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. The City's General Plan Safety Element, discussed below, recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to and handle emergencies. Under the Framework Element, the City standard for response distance from a fire station is 1.5 miles.[6] This is consistent with the specifications for response distances within the LAMC, discussed below.

(c) City of Los Angeles General Plan Safety Element

The City's General Plan 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 General Plan Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities. For example, Policy 2.1.6 requires the LAFD to revise regulations and procedures to include the establishment of minimum standards for the location and expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and emergency medical service response. In addition, the City's General Plan Safety Element designates disaster routes. The nearest designated disaster route to the Project Site is Olympic Boulevard, which is approximately 70 feet to the north of the Project Site.[7]

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

[6] *City of Los Angeles General Plan Framework Element, p. 9-5.*

[7] *City of Los Angeles General Plan Safety Element, Exhibit H, adopted by the City Council, November 26, 1996.*

(d) West Los Angeles Community Plan

The Project Site is located within the planning boundary of the West Los Angeles Community Plan. The Community Plan, adopted on July 27, 1999, and last amended on September 7, 2016, includes the following objective and policies related to fire protection:

- Objective 9-1: Ensure that fire facilities and protective services are sufficient for the existing and future population and land use.
  - Policy 9-1.1: Coordinate with the Fire Department the review of significant development projects and General Plan amendments affecting land use to determine the impact on service demands.
  - Policy 9-1.2: Assist the Fire Department in locating fire service facilities at appropriate locations throughout the Community.

(e) Los Angeles Municipal Code

The LAMC includes provisions for new construction projects within the City. The LAMC contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. LAMC Chapter V, Article 7, Fire Prevention and Protection (also known as the 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.[8]

Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, LAMC Section 57.107.7 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: 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, as applicable. Furthermore, LAMC Section 57.118

[8] *LAMC Article 7, Chapter V, Former Article 7 Repealed and Replaced by Ordinance Number 186,616, effective May 24, 2020, to incorporate by reference portions of the 2019 California Code and the 2018 International Fire Code.*

establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects. The Project would comply with these requirements of the Fire Code, as applicable.

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

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. As stated above, based on LAFD's fire flow determination, the Project would be considered under the Industrial and Commercial category, and therefore would require one hydrant per 80,000 square feet of land with a 300-foot distance between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. If required by the LAFD, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with LAMC Table 57.507.3.3. Based on Table 57.507.3.3 provided in LAMC Section 57.507.3.3 and as set forth in the correspondence from LAFD, the maximum response distance for the Project from fire stations with an engine company is one mile and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

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[9] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

(f) City of Los Angeles Propositions

Proposition F, the City Fire Facilities Bond, approved by voters in November 2000, allocated $378.6 million to build 19 new or replacement neighborhood fire/paramedic stations.[10] The Proposition F Fire Facilities Bond Team consists of the LAFD, the City Bureau of Engineering (BOE), and a contracting firm Bovis Lend Lease. This team oversees allocation of the funds and has identified numerous projects to upgrade fire facilities, including construction of new training centers, replacing and constructing new fire stations, and building a new Air Operations Helicopter Facility and General Services Helicopter Fleet Maintenance Building.[11] 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.[12]

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. This proposition involves the spending of $600 million to renovate, improve, expand and construct public safety (police, fire, paramedic) facilities.[13] Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five police stations, replacement of one police station and jail, construction of two bomb squad facilities, replacement of one jail, construction of one new Emergency Operations Center/Police Operations Center/Fire Dispatch Center facility, construction of the Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities.[14] As part of Proposition Q, the renovation of 80 fire stations was completed in May 2014.[15]

Measure J, which was approved by voters at the November 7, 2006 election, is a charter amendment and ordinance that involves technical changes to Proposition F. Under Proposition F, the construction of new regional fire stations to provide training and other

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[10] *City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, https://eng.lacity.org/fire_bond, accessed November 15, 2020.*

[11] *City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, https://eng.lacity.org/fire_bond, accessed November 15, 2020.*

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

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

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

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

facilities at or near standard fire stations was required to take place on single sites of at least two acres. Measure J allows new regional fire stations funded by Proposition F and located in densely developed areas to be designed and built on one or more properties equaling less than two acres.

(g) Los Angeles Fire Department Strategic Plan 2018–2020[16]

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: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development. With implementation of specific strategies, the Strategic Plan 2018–2020 will also align its progress with Mayor Eric Garcetti's four priority outcomes to provide a safe city, a well-run city government, a livable and sustainable city, and a prosperous city.

(h) Reorganization by the LAFD[17]

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

The four bureaus, Central (at Fire Station No. 3 near the Civic Center), South (at the San Pedro City Hall complex), Valley (at Fire Station No. 88 in Sherman Oaks) and West (at Fire Station No. 82 in Hollywood), bring the LAFD more in line with the established organizational model now in use by the LAPD. Similar to the LAPD, the new four bureau system intends to make the LAFD more effective and responsive to community needs.

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16 *LAFD, Strategic Plan 2018–2020.*

17 *LAFD Implements New Bureau Command Structure, January 12, 2015, http://lafd.org/news/lafd-implements-new-bureau-command-structure, accessed November 15, 2020.*

b. Existing Conditions

(1) Fire Protection Services and Facilities

The LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.[18] A total of 1,018 firefighters are always on duty at fire department facilities citywide, including the 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction. In addition, the LAFD is supported by 381 technical and administrative personnel.[19]

As shown in Figure IV.H.1-1 on page IV.H.1-10, there are two LAFD fire stations located within a 2-mile radius of the Project Site. The closest station to the Project Site is Fire Station No. 92, which is the designated "first-in" station, located approximately 0.8 mile southwest of the Project Site at 10556 West Pico Boulevard.[20] As provided by the LAFD and summarized in Table IV.H.1-1 on page IV.H.1-11, Fire Station No. 92 consists of a task force (includes an aerial ladder fire engine/truck company and two single engines), a paramedic rescue ambulance, and a basic life support (BLS) rescue ambulance, and a staff of 12. [21]

The secondary fire station that serves the Project Site is Fire Station No. 59, which is located approximately 1.9 miles southwest of the Project Site at 11505 West Olympic Boulevard. [22] Fire Station No. 59 consists of an assessment engine, paramedic rescue ambulance, emergency medical services (EMS) Battalion Captain, rehab air tender, and a staff of six.[23]

The LAFD also identified three additional fire stations beyond a 2-mile radius of the Project Site that could serve the Project Site. Fire Station No. 43, which is located approximately 2.6 miles south of the Project Site at 3690 S. Motor Avenue, consists of an

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18 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed August 11, 2020.*

19 *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed August 11, 2020.*

20 *LAFD, Find Your Station, www.lafd.org/fire-stations/station-results, accessed November 15, 2020.*

21 *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

22 *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

23 *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

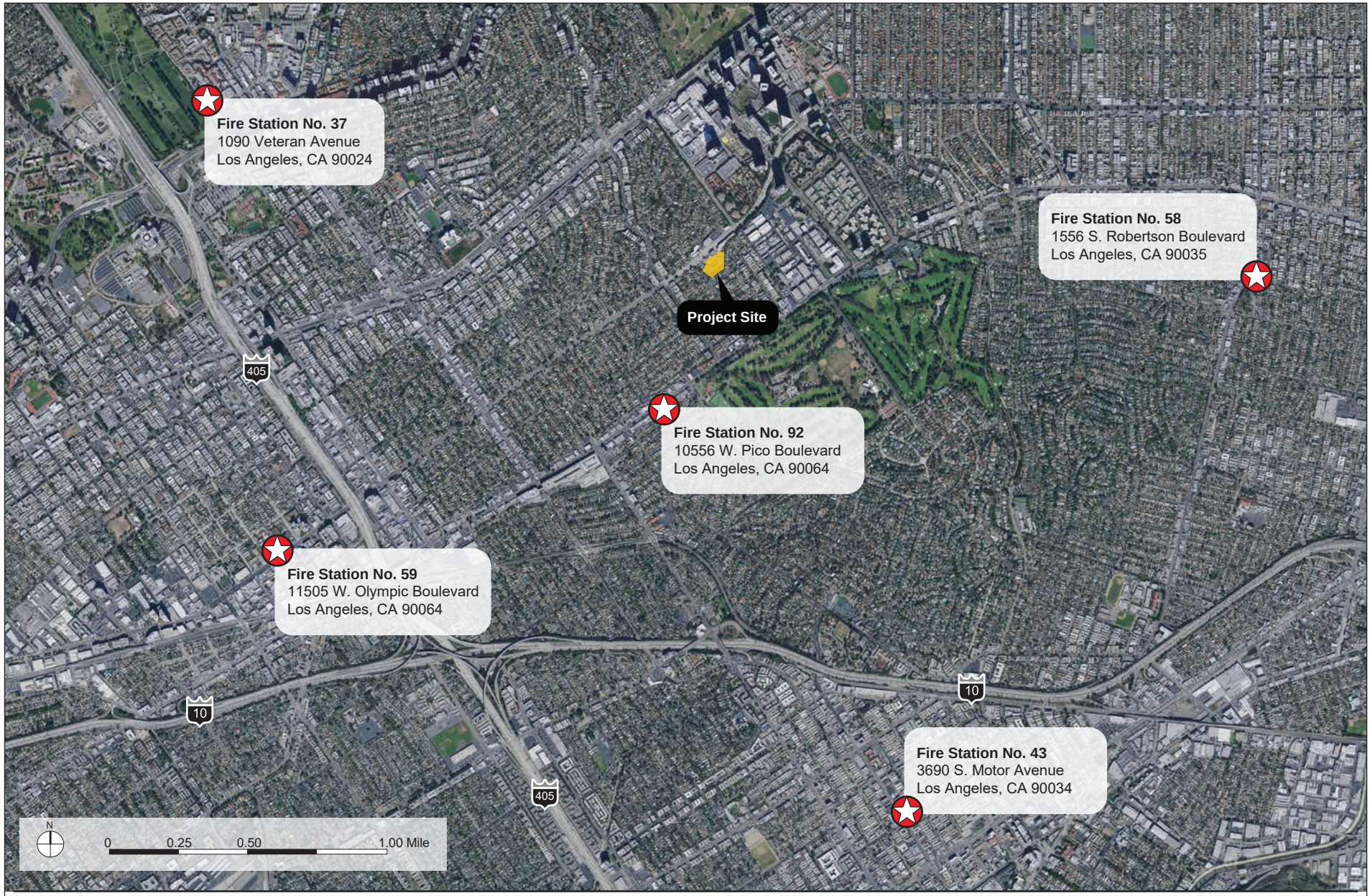

Figure IV.H.1-1
Fire Stations in the Vicinity of the Project Site

Source: Apple Maps, 2019; Eyestone Environmental, 2019.

Table IV.H.1-1
Los Angeles Fire Department Fire Stations Located in the Vicinity of the Project Site

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 92 10556 W. Pico Boulevard Los Angeles, CA 90064	0.8 mile	• Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance	• 12 staff
Fire Station No. 59 11505 W. Olympic Boulevard Los Angeles, CA 90064	1.9 miles	• Assessment Engine • Paramedic Rescue Ambulance • EMS Battalion Captain • Rehab Air Tender	• 6 staff
Fire Station No. 43 3690 S. Motor Avenue Los Angeles, CA 90034	2.6 miles	• Engine • Paramedic Rescue Ambulance	• 6 staff
Fire Station No. 58 1556 S. Robertson Boulevard Los Angeles, CA 90035	2.7 miles	• Assessment Engine • Paramedic Rescue Ambulance • BLS Rescue Ambulance	• 8 staff
Fire Station No. 37 1090 Veteran Avenue Los Angeles, CA 90024	2.8 miles	• Task Force • Paramedic Rescue Ambulance	• 14 staff

Source: Correspondence with Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.

engine, paramedic rescue ambulance, and a staff of six.[24] Fire Station No. 58, located approximately 2.7 miles east of the Project Site at 1556 S. Robertson Boulevard, consists an assessment engine, paramedic rescue ambulance, a BLS rescue ambulance, and a staff of eight. Fire Station No. 37, located approximately 2.8 miles northwest of the Project Site at 1090 Veteran Avenue, consists of a task force, paramedic rescue ambulance, and a staff of 14.[25]

The response times for January 2019 to December 2019 are shown in Table IV.H.1-2 on page IV.H.1-12. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Associated (NFPA) standard of

[24] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

[25] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

Table IV.H.1-2
Average Emergency Medical Service and Structure Fire Response Times

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 92	7:24	6:29
Fire Station No. 59	6:31	6:30
Fire Station No. 43	6:18	6:13
Fire Station No. 58	7:03	7:02
Fire Station No. 37	7:00	6:32

[a] *Response times are based on January 2019–December 2019 data.*

Source: LAFD: FireStatLA, Station 92 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=731&year=2019, accessed August 11, 2020; FireStatLA, Station 59 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=571&year=2019, accessed August 11, 2020; FireStatLA, Station 43 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=506&year=2019, accessed August 11, 2020; FireStatLA, Station 58 Response Metrics for January-December 2019, www.lafd.org/fsla/stations-map?st=566&year=2019, accessed August 11, 2020; FireStatLA, Station 37 Response Metrics for January–December 2019, www.lafd.org/fsla/stations-map?st=476&year=2019, accessed August 11, 2020.

5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response.[26]

Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[27] The City has over 205 miles of major arterial routes that are equipped with FPS.[28]

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

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

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

According to the LAFD, although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, 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 Trustees of California State University* (2015) 242 Cal. App. 4th 833, 847 ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access, including emergency vehicle access, to the Project Site is currently available via several driveways along Bellwood Avenue.

(3) Fire Water Infrastructure

As discussed in the Utility Report, included as Appendix J of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via LADWP water lines within adjacent streets. Specifically, as discussed in the Utility Report, record drawings provided by LADWP show that a 4-inch water line splits the northernly and southernly portions of the property in the existing Bellwood Avenue alignment, connecting to a 6-inch main line along Olympic Boulevard. Additionally, another existing 12-inch main line runs along the south side of Olympic Boulevard. In addition, there are two existing fire hydrants located within 300 feet of the Project Site boundary, along the north side of Olympic Boulevard fronting the neighboring properties.

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[29] Therefore, the Project Site is not located within a fire hazard area.

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[29] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, for APNs 4315018034, 4315018033, 4315018032, 4315018031, 4315018030, and 4315018029.*

3. Project Impacts

a. Thresholds of Significance

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

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

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

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

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

b. Methodology

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

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact, but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection is determined by whether construction of new or expanded fire protection facilities 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 Project 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 that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Sections 15301 or 15332.

c. Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section II, Project Description, of this Draft EIR, as an eldercare facility, caregivers and staff will be trained in senior care and emergency response, and nurses would also be located on-site. In addition, as discussed in Section IV.I, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project would implement a construction management plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[30] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[31] Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of existing LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. As part of the Project, the portion of Bellwood Avenue that bifurcates the Project Site would be vacated and realigned. Therefore, construction activities would occur along the existing portion of Bellwood Avenue within the Project Site. Construction of the Project and the realignment of Bellwood Avenue would require temporary rerouting of vehicular and pedestrian traffic. However, outside of the realignment area of Bellwood Avenue, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period, and emergency access would be maintained and would not be impeded, including emergency access to

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[30] *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed November 15, 2020.*

[31] *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed November 15, 2020.*

properties adjacent to the Project Site. In addition, as discussed in Section IV.I, Transportation, of this Draft EIR, a Construction Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Specifically, construction work or equipment parking on adjacent streets would be prohibited and construction activity associated with the new building and on-site improvements would be contained within the Project Site. Appropriate construction traffic control measures (e.g., flag persons) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access. However, with implementation of Project Design Feature TR-PDF-1, the majority of construction-related traffic, including hauling activities and construction worker trips would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, construction of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, nor the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Therefore, impacts related to fire protection during Project construction would be less than significant.

(b) Operation

(i) Facilities, Equipment, and Response Distance

The Project Site would continue to be served by Fire Station No. 92, which is the designated “first-in” station for the Project Site, located approximately 0.8 mile southwest of the Project Site at 10556 West Pico Boulevard. As provided by the LAFD and summarized

in Table IV.H.1-1 on page IV.H.1-11, Fire Station No. 92 is equipped with a task force (includes an aerial ladder fire engine/truck company and two single engines), a paramedic rescue ambulance, a BLS rescue ambulance, and a staff of 12. As such, based on criteria regarding response distance per LAMC Section 57.507.3.3, the Project Site is located within the required one-mile response distance from a fire station with an engine company and within the 1.5 miles response distance from a fire station with a truck company. In addition, the LAFD has determined fire protection (based on the response distance from existing fire stations criteria) to be adequate.[32]

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct 192 senior housing residential units, including 71 senior-independent dwelling units, 75 assisted living guest rooms, and 46 memory care guest rooms. Based on the generation rates used in the City of Los Angeles VMT Calculator, the Project would generate approximately 231 residents.[33] The Project is also estimated to generate approximately 88 employees.[34]

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three multi-family residential developments, consisting of 112 units, and associated structures and parking. To accommodate the Project's proposed uses, all existing structures would be removed. Assuming the existing units are each occupied by one person[35], the Project would result in a net increase of 119 on-site residents[36] plus approximately 88 employees on a given day. Therefore, the Project would

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[32] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, July 12, 2019.*

[33] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H. The VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents. For the same reasons described below, even with a net increase of 132 residents, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service, and the conclusions of the analysis would remain the same.*

[34] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.*

[35] *To provide a conservative analysis, the existing fire service population accounts for an existing residential population of 112 assuming one person within each occupied unit rather than the 2.25 persons per unit for "Multi-Family Residential" land use provided by the City of Los Angeles VMT Calculator Documentation Guide. The majority of the existing housing units are studio units, and the existing units range in size from approximately 275 to 375 square feet.*

[36] *As noted above, the VMT Calculator assumption of 231 Project residents is more conservative in evaluating VMT per capita; however, if full occupancy of the Project is assumed with one person per bedroom, the Project could generate up to 244 residents, which would result in a net increase of 132 residents as compared to 119 residents. For the same reasons described below, even with a net increase of 132 residents, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service, and the conclusions of the analysis would remain the same.*

increase the building area and daytime population of the Project Site compared to existing conditions. As such, the Project would increase the demand for LAFD fire protection services.

The proposed uses would be expected to generate a range of fire service calls similar to other typical residential uses. The Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site.

The Project would implement all applicable Los Angeles Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc., including as set forth in the written correspondence from the LAFD included in Appendix G of this Draft EIR. Compliance with applicable City Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment resulting from the Project. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, in accordance with the fire protection-related goals, objectives, and polices set forth in the Framework Element, the Safety Element, and the West Los Angeles Community Plan, as listed in the regulatory framework above and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Objective 9-1 of the West Los Angeles Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element).

(ii) Emergency Access

As discussed in Section II, Project Description, of this Draft EIR, vehicular access, including emergency access, to the Project Site would be provided along Bellwood Avenue from Olympic Boulevard. While the portion of Bellwood Avenue that bifurcates the Project

Site would be vacated and realigned, and may become a private street, continuous public access through Bellwood Avenue would be maintained, and emergency access to the Project Site and surrounding area would continue to be provided. Additionally, the proposed realignment would comply with the City's applicable requirements, including emergency access requirements set forth by the Los Angeles Department of Building and Safety and LAFD.

The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access as set forth in the written correspondence from the LAFD included in Appendix G of this Draft EIR. Additionally, the area surrounding the Project Site includes an established street system, consisting of primary and secondary arterials, and collector and local streets, which provide sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. Furthermore, drivers of emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. As such, emergency access to the Project Site and surrounding uses would be maintained at all times.

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

(iii) Fire Flow

As discussed in the Utility Report, included as Appendix J 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 Site would be required to meet City fire flow requirements as set forth in Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence, provided in Appendix G of this Draft EIR, the Project has a required fire flow of 6,000 to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously. In addition, all hydrants must be spaced to provide adequate coverage of building exterior.

As discussed in the Utility Report, a Service Advisory Request (SAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. LADWP has indicated that the existing 4-inch line in Bellwood Avenue would require abandonment. In addition, an 8-inch line approximately 250 feet in length would be required to be installed within the easterly drive aisle of Bellwood Avenue and an 8-inch line approximately 213 feet in length would be required to be installed in the westerly drive aisle of Bellwood Avenue. The two new 8-inch lines would tie into the 12-inch main in Olympic Boulevard.

Furthermore, as set forth in LAMC Section 57.507.3, land uses considered under the Industrial and Commercial category require one hydrant per 80,000 square feet of land with a 300-foot distance between hydrants, and 2.5-inch by 4-inch double fire hydrant or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. As described in the Utility Report, an Information of Fire Flow Availability (IFFAR) was submitted to LADWP for the two existing fire hydrants as well as for the two proposed private fire hydrants, which would be located within the private drive aisle fronting the building and behind the building. Based on the completed IFFAR, the two existing fire hydrants, the two proposed fire hydrants, and the proposed 8-inch water lines discussed above would be adequate to provide the required fire coverage. If later required by the LAFD during their standard building permit fire/life safety plan review, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

(iv) Conclusion

Based on the analysis above, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. **Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Project impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection services is the service areas of Fire Station Nos. 92, 59, 43, 58, and 37. The Project, in conjunction with growth forecasted in the City through 2023 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection services. Cumulative growth in the greater Project area through 2023 includes six known development projects, growth that may be projected as a result of the land use designation and policy changes contained in the West Los Angeles Community Plan Update, as well as general ambient growth, as described in Section III, Environmental Setting, of this Draft EIR.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 6 is a conservative assumption, as some of the related projects may not be built out by 2023 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 6 are fully built out by 2023, unless otherwise noted.

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 92, 59, 43, 58, and 37. The increase in development and service populations from the Project, related projects, as well as other future development in the West Los Angeles Community Plan area would result in a cumulative increase in the demand for LAFD services. As concluded in the written correspondence from the LAFD included in Appendix G of this Draft EIR, development of the Project as well as the related Projects could result in the need for increased staffing, additional fire protection facilities, and the relocation of present fire protection facilities. However, similar to the Project, the related projects and other future development projects in the West Los Angeles Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Moreover, given that the Project Site is located within an urban area, the related projects identified in the area would also be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Furthermore, each related project and other future development

projects in the West Los Angeles Community Plan area would be required to comply with regulatory requirements related to fire protection. In addition, the Project, related projects, and other future development projects in the West Los Angeles Community Plan area would be subject to the City's standard construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

Like the Project, the related projects and other future development projects in the West Los Angeles Community Plan area would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate.[37] Cumulative increases in demand for fire protection and emergency medical services due to related projects and other future development projects in the West Los Angeles Community Plan area would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

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

[37] *City of Los Angeles, Proposed Budget for the Fiscal Year 2018–19.*

Guidelines Section 15301 or 15332.[38] Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

Based on the above, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered government facilities (i.e., fire), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution to cumulative impacts on fire protection during construction and operation would not be cumulatively considerable, and cumulative impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

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