IV. Environmental Impact Analysis

H.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 LAFD's website, written correspondence from the LAFD Bureau of Fire Prevention and Public Safety dated September 23, 2020, and included in Appendix P; and the *Water Utility Report* prepared for the Project by KPFF Consulting Engineers, dated January 21, 2021 (Utility Report), which is included in Appendix V to 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 (OSHA)
- 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 (Cal OES)
- City of Los Angeles Charter
- City of Los Angeles General Plan Safety Element
- Community Plan
- Los Angeles Municipal Code (LAMC)
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

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

(b) Federal Emergency Management Act

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 [U.S.C.] 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 U.S.C. Section 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 Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

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

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation [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.[1] The building standards in the California Building

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

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 LAMC with local amendments, as discussed below.[2]

(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 Cal OES, Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the state, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.[4]

(c) California Vehicle Code

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

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as*

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

[3] *Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised December 2014.*

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

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

otherwise directed by a traffic officer, do the following: (a) (1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety. (b) The operator of every street car shall immediately stop the street car, clear of any intersection, and remain stopped until the authorized emergency vehicle has passed. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

(d) California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that, cities have "a constitutional obligation to provide adequate fire protection services".

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

(3) Local

(a) City of Los Angeles Charter

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

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Goal 9J of the Infrastructure and Public Services Chapter of the General Plan Framework specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure.[6] Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the City have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the General Plan Framework, 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.[7] This is consistent with the specifications for response distances within the LAMC, discussed below. The relevant

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

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

General Plan fire protection goals, objectives, and policies are included in Table IV.H.1-1 on page IV.H.1-8.

(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. In addition, the City's Safety Element designates disaster routes. The relevant General Plan Safety Element emergency response (multi-hazard) goals, objectives, and policies are included in Table IV.H.1-2 on page IV.H.1-9.

(d) 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.

As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the Wilshire Community Plan area. The Wilshire Community Plan, adopted on September 19, 2001, includes the following objectives and policies that are relevant to fire protection:

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

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

- Policy 9-1.2: Assist the City of Los Angeles Fire Department in locating fire service facilities at appropriate locations throughout the Wilshire Community Plan Area.

Table IV.H.1-1
Relevant General Plan Fire Protection Goals, Objectives, and Policies—General Plan Framework: Chapter 9, 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

Source: City of Los Angeles 2001.

(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 57.106.5.2 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.

Table IV.H.1-2
Relevant Emergency Response (Multi-Hazard) 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.
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.

Table IV.H.1-2 (Continued)
Relevant Emergency Response (Multi-Hazard) Goals, Objectives, and Policies—Safety Element

Policy 3.1.1	Coordination: Coordinate with each other, with other jurisdictions and with appropriate private and public entities prior to a disaster and to the greatest extent feasible within the resources available, to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster. [All EOO recovery programs involving cooperative efforts between entities implement this policy.]

Source: City of Los Angeles 2001.

Section 57.107.6 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

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 57.4704.4.3.1 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 57.4705.4 requires each building to have a rooftop emergency helicopter landing facility (EHLF) in a location approved by the Chief.

Section 57.4705.1.6 requires at least one elevator in each bank of elevators to be available for fire emergency service and to 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 floor. The elevator or elevators must be interconnected with the standby power.

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, 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.

LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

(f) Propositions F and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 acres. This is

to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 19 new or replacement neighborhood Fire/Paramedic Stations and an Emergency Air Operations and Helicopter Maintenance Facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.[8]

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[9]

(g) Measure J

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

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

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

and community resiliency; and (5) Increase opportunities for personal growth and professional development.

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 who provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. 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.[10]

As shown in Figure IV.H.1-1 on page IV.H.1-14, there are two LAFD fire stations located within a 2-mile radius of the Project Site. According to the LAFD, the "first-in" station for the Project Site is Fire Station No. 58, which is located at 1556 S. Robertson Boulevard, approximately 1.9 miles south of the Project Site.[11] As shown in Table IV.H.1-3 on page IV.H.1-15, Fire Station No. 58 consists of an assessment engine, two paramedic rescue ambulances, a Basic Life Support (BLS) rescue ambulance, and eight staff.[12]

As identified by the LAFD, secondary fire stations that serve the Project Site include Fire Station Nos. 61, 68, 92, and 43. Specifically, Fire Station No. 61 is located at 5821 West 3rd Street, approximately 1.8 miles east of the Project Site. This station is equipped with a task force, paramedic rescue ambulance, BLS rescue ambulance, and 14 staff.[13] Fire Station Nos. 68, 92, and 42 are located beyond a 2-mile radius of the Project Site. Fire Station No. 68 is located at 5023 West Washington Boulevard, approximately 3.3 miles southeast of the Project Site. This station is equipped with an

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[10] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed October 12, 2020.*

[11] *LAFD, Find Your Station, https://www.lafd.org/fire-stations/station-results, accessed October 12, 2020.*

[12] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.*

[13] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.*

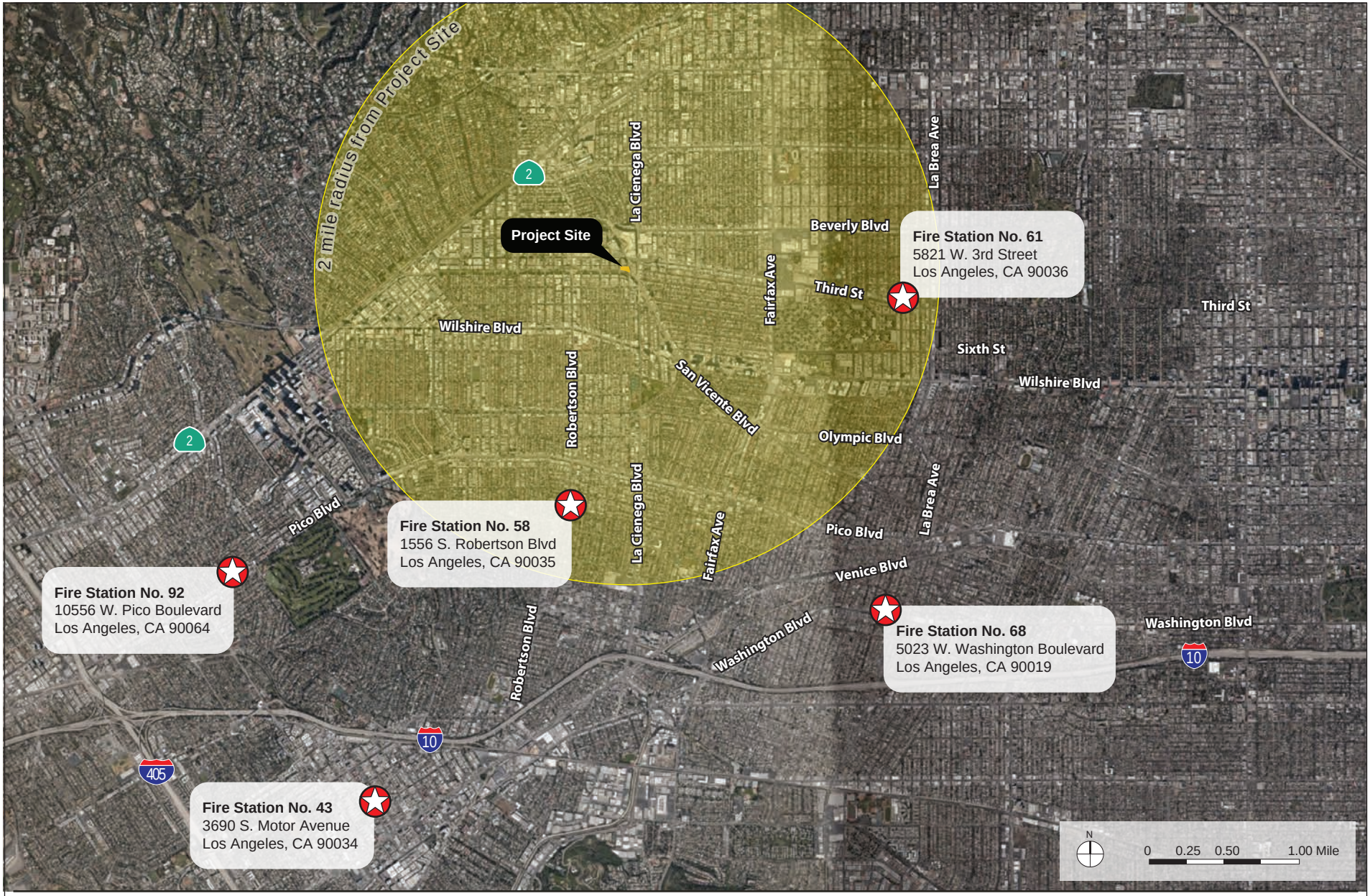

Figure IV.H.1-1
Fire Stations in the Vicinity of the Project Site

Source: Apple Maps, 2020; Eyestone Environmental, 2020.

Table IV.H.1-3
LAFD Fire Stations Located in the Vicinity of the Project Site

Station No., Location, and Community Served	Distance from Project Site	Equipment[a]	Staffing
Fire Station No. 58[b] 1556 S. Robertson Blvd. Los Angeles, CA 90035	1.9 miles	• Assessment Engine • Two Paramedic Rescue Ambulances • BLS Rescue Ambulance	Eight staff
Fire Station No. 61 5821 W. 3rd Street Los Angeles, CA 90036	1.8 miles	• Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance	14 staff
Fire Station No. 68 5023 W. Washington Boulevard Los Angeles, CA 90019	3.3 miles	• Engine • Paramedic Rescue Ambulance	Eight staff
Fire Station No. 92 10556 W. Pico Boulevard Los Angeles, CA 90064	3.9 miles	• Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance	10 staff
Fire Station No. 43 3690 S. Motor Avenue Los Angeles, CA 90034	4.8 miles	• Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance	Six staff

[a] *A Light Force is comprised of a truck company running with a single engine. A Task Force is comprised of a truck company running with two engines.*

[b] *Based on written correspondence from LAFD, Fire Station No. 58 is the designated first-in station for the Project Site.*

Source: Correspondence with Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.

engine and paramedic rescue ambulance, and a staff of eight.[14] Fire Station No. 92 is located at 10556 West Pico Boulevard, approximately 3.9 miles southwest of the Project Site. This station is equipped with an assessment light force, paramedic rescue ambulance, BLS rescue ambulance, and a staff of 10.[15] Fire Station No. 43 is located at 3690 South Motor Avenue, approximately 4.8 miles southwest of the Project Site. This

[14] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.*

[15] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.*

station is equipped with an assessment light force, paramedic rescue ambulance, BLS rescue ambulance, and 6 staff.[16]

LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of five minutes for EMS response and five minutes, 20 seconds for fire suppression response. 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 the path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), which automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[17] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[18]

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is only one factor among several that LAFD utilizes in evaluating its ability to respond to fires and life and health safety emergencies, along with a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's 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.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with the following improvements: a one-story cathedral; three ancillary church buildings, including a two-story rectory, a one-story social hall, and a three-story building with offices and meeting rooms; and a surface parking lot. Vehicular access,

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[16] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.*

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

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

including emergency vehicle access, to the Project Site is currently available from two driveways along Burton Way and at various points along the publicly-accessible alley that abuts the Project Site.

(3) Fire Water Infrastructure

As discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) provides water for firefighting services in accordance with the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC). Water service is currently provided to the Project Site from an existing eight-inch water main in S. San Vicente Boulevard, an existing 6-inch water main in Holt Avenue, and an existing 12-inch water main in W. Burton Way. Also, the 656 S. San Vicente Boulevard lot within the Project Site is served by two 1.5-inch existing water services off of S. San Vicente Boulevard.

In addition, there are four existing public fire hydrants in the vicinity of the Project Site. The hydrant locations are: (1) West side of S. San Vicente Boulevard, 225 feet north of the centerline of S. San Vicente Boulevard and W. Burton Way; (2) North side of W. Burton Way, 70 feet west of the centerline of W. Burton Way and Holt Avenue; (3) South side of W. Burton Way, 35 feet west of the centerline of W. Burton Way and Holt Avenue; and (4) South side of W. Burton Way, 57 feet west of the centerline of W. Burton Way and Le Doux Road.

(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.

3. Project Impacts

a. Thresholds of Significance

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

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (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.

The factor identified below from the *L.A. CEQA Thresholds Guide* were used where applicable and relevant to assist in analyzing this Appendix G threshold. The *L.A. CEQA Thresholds Guide* identifies the following criterion 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 protection 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. The evaluation of the Project's impact on fire protection services considers whether 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, the construction of which would cause significant environmental impacts. 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.[19] 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 and whether the impacts associated with that facility would be significant. There are no current capital improvement plans for the construction or expansion of fire facilitates in the impact area. Therefore, the City makes the assumptions

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

based on existing zoning standards and the 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 generally be located on parcels that are infill opportunities, similar to existing fire stations in the Project vicinity, and on lots that range from 0.75 acre to 2 acres in size, as described above; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332, Negative Declaration, or Mitigated Negative Declaration.

c. Project Design Features

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 of the LAMC regarding fire flow requirements. No project design features are proposed with regard to fire protection.

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 (CTM Plan), which includes a Worksite Traffic Control Plan (WTC Plan) that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. 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.[20] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[21] 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. Construction activities would 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. Therefore, although construction activities would be short-term and temporary for the area, those activities could temporarily impact emergency access. While most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction would require a temporary closure of the sidewalks adjacent to the Project Site on San Vicente Boulevard, Burton Way and/or Holt Avenue. A CTM Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 discussed in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The plans would be prepared by the Applicant for approval by LADOT prior to the issuance of any construction permits and would provide a detour plan and a staging plan. In addition, the plans would specify the details of any sidewalk or lane closures as well as traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activities. The Applicant would coordinate plan details with emergency services and affected transit providers to ensure

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[20] *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 October 12, 2020.*

[21] *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 October 12, 2020.*

emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, emergency access to the Project Site would remain unobstructed during construction of the Project.

Based on the above, Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, (i.e. fire), or the need for new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, the Project's impact on fire protection services during Project construction would be less than significant, and no mitigation measures are required.

(b) Operation

The analysis of the Project's potential operational impacts on LAFD services addresses potential impacts associated with LAFD resources and equipment, response distances and access, and the ability of the water infrastructure system to provide the necessary fire flows.

(i) Facilities, Equipment and Response Distance

The Project Site would continue to be served by Fire Station No. 58, which is the designated "first-in" station for the Project Site, located approximately 1.9 miles south of the Project Site at 1556 S. Robertson Boulevard. As provided by the LAFD and summarized in Table IV.H.1-3 on page IV.H.1-15, Fire Station No. 58 consists of an assessment engine, 2 paramedic rescue ambulances, Basic Life Support (BLS) rescue ambulance, and 8 staff.[22] As such, based on criteria regarding response distance for Industrial and Commercial land uses per LAMC Section 57.507.3.3 (which the LAFD has determined applies to high-rise residential buildings), the Project Site is not located within the required 1-mile response distance from a fire station with an engine company and within the required 1.5-mile response distance from a fire station with a truck company. Therefore, the LAFD has determined fire protection (based on the response distance from existing fire stations

[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, September 23, 2020. See Appendix P to this Draft EIR.*

criteria) to be inadequate.[23] As the response distance is greater than that which is allowable, in accordance with LAMC Section 57.507.3.3 (as interpreted by the LAFD to apply to high-rise residential buildings), all Project structures would be constructed with automatic fire sprinkler systems. In addition, as discussed above, the LAFD has identified Fire Station Nos. 61, 68, 92, and 43 as capable of responding to the Project Site.

As discussed in Section II, Project Description, of this Draft EIR, the Project includes new 153 residential units. Based on a 2.41 persons per household rate provided by the City, the Project would generate approximately 369 residents.[24,25] The Project would not increase the existing number of church employees. Therefore, the Project's development would increase the building area on the Project Site and the demand for LAFD fire protection services when compared to existing conditions. The proposed uses would be expected to generate a range of fire service calls similar to other such 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. Therefore, combined with the features discussed below, 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 combined with the features discussed below.

As described in Section II, Project Description, of this Draft EIR, the new 19-story, multi-family residential building would reach a maximum height of 225 feet above ground level and the ancillary church uses would be located in a new three-story church building with a height of approximately 42 feet. As a result, LAMC Section 57.4705.4 requires an emergency helicopter landing facility on the roof of the residential building. However, LAFD Requirement No. 10 allows the implementation of one of two alternate options with approval of the Fire Marshal: (1) provision of a helicopter tactical landing area; or (2) additional life safety elements including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways. Here, the residential building would comply with Option 2 of LAFD Requirement No. 10, with approval

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[23] *Written correspondence from Ralph M. Terrazas, Fire Marshal, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, September 23, 2020. See Appendix P to this Draft EIR.*

[24] *Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.*

[25] *As a note, the Initial Study for the Out Lady of Mt. Lebanon Project (Appendix A to this Draft EIR) applied an estimated rate of 2.6 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.*

from the Fire Marshal and provide the life safety elements discussed above. The Project would also 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 P to 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, which requirements are set forth in LAMC Section 57.118 and must be satisfied 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 substantially 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 objectives and polices set forth in the Framework Element, the Safety Element, and the Wilshire Community Plan, as listed in the regulatory framework above, and as confirmed in the written correspondence from the LAFD, the City and LAFD would continue to monitor the demand for existing and projected fire facilities (see Objective 9.16 in the Framework Element, Policy 2.1.6 in the Safety Element, and Fire Protection Objective 9-1 in the Wilshire Community Plan), and coordinate the development of new fire facilities to be phased with growth (see Objective 9.18 in 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 by a driveway along the publicly-accessible alley that abuts the Project Site to the north.

The Project's driveways and internal circulation would be designed to meet all applicable City Building 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 P to this Draft EIR. In addition, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project vicinity. 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 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. Overall, emergency access to the Project Site and surrounding area would be maintained.

(iii) Fire Flow

As discussed in the Utility Report included as Appendix V to 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 LAMC Section 57.507.3.1 (as interpreted by the LAFD to apply to high-rise residential buildings), which establishes fire flow standards by development type. As determined by the LAFD in their written correspondence provided in Appendix P to this Draft EIR, the required fire flow for the Project, which includes a high-rise residential building, will be 9,000 gallons per minute (gpm) from six fire hydrants flowing simultaneously with a minimum residual pressure of 20 pounds per square inch (psi). In addition, all hydrants must be spaced to provide adequate coverage of building exterior.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) 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. As described in the Utility Report, there are currently six existing fire hydrants located near the Project Site. Based on the completed IFFAR (see Exhibit 2 of the Utility Report included as Appendix V to this Draft EIR), the existing fire hydrants (F-35685, F-34688, F-42069, F-42067, F-42389, and F-34694) cannot supply enough flow to reach the required 9,000 gpm from six hydrants flowing simultaneously with a residual pressure greater than 20 psi.[26] As such, the LADWP has recommended installation of a new water main to facilitate additional fire flow and water pressure to the Project Site. Specifically, LADWP recommends installing a new water main consisting of 156 linear feet of new 12-inch pipe on Sherbourne Drive across Burton Way to provide the required flow of 9,000 gpm for the Project to connect two existing systems on Sherbourne Drive located on the north and

[26] *As shown in the IFFAR included in the Utility Report, the six hydrants near the Project Site can provide 6,000 gpm.*

south sides of Burton Way to provide the required flow of 9,000 gpm to the Project Site (see Exhibit 3 of the Utility Report included as Appendix V to this Draft EIR). However, as with construction of the Project, impacts associated with this upgrade would be temporary in nature and would not cause lasting effects that would impact LAFD operations. Additionally, while temporary lane closures would be required, the Project would implement a CTM Plan pursuant to Project Design Feature TR-PDF-1 discussed in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site. Lastly, as also discussed above, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

As set forth in LAMC Section 57.507.3.2 (as interpreted by the LAFD to apply to high-rise residential buildings), land uses considered under the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch 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. As described above, the six existing fire hydrants located near the Project Site would not provide sufficient fire flow. However, as discussed above, with the installation of a new water main on Sherbourne Drive across Burton Way, adequate fire flow would be available to serve the Project. If later required by the LAFD during their fire/life safety plan review, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project. The Project would also incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting of the Project and would reduce or eliminate the public hydrant demands.

(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. The Project's impact would be less than significant, and no mitigation measures are required.**

(2) Mitigation Measures

The Project's impact with regard to fire protection would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

The Project's impact with regard to fire protection were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact levels 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 for Fire Station Nos. 58, 61, 68, 92, and 43. The Project, in conjunction with growth forecast in the City through 2024 (i.e., the Project buildout year), would generate a cumulative demand for fire protection services. As identified in Section III, Environmental Setting, of this Draft EIR, there are 44 related projects located in the vicinity of the Project Site. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 44 are fully built out by 2024, unless otherwise noted. The projected growth reflected by Related Project Nos. 1 through 44 is a conservative assumption, as some of the related projects may not be built out by 2024 (i.e., the Project buildout year), may never be approved or built, or may be approved and built at reduced densities. Of the 44 related projects, 17 are located in the City of Los Angeles. All 17 of the City of Los Angeles related projects fall within the boundaries of the Wilshire Community Plan and are served by LAFD. Specifically, three related projects are served by Fire Station No. 58 and 14 related projects are served by Fire Station No. 61. Related projects within the City of Beverly Hills are served by the Beverly Hills Fire Department and related projects within the City of West Hollywood are served by the Los Angeles County Fire Department.

As noted above, the 17 related projects within the City of Los Angeles fall within the service areas for Fire Station Nos. 58 and 61. The increase in development and service populations from the Project and related projects in the Wilshire Community Plan area would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects and other future development projects in the Wilshire 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 and many of the related projects identified are located within an urbanized area, the Project Site and related

projects would fall within an acceptable distance from one or more existing fire stations. If any of the related projects fall outside an acceptable response distance, like the Project, they would be required to be fully sprinklered. Furthermore, each related project and other future development in the Wilshire Community Plan area would be required to comply with regulatory requirements related to fire protection. In addition, the Project and related projects 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.

The Project and related projects 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.[27] Cumulative increases in demand for fire protection services due to related projects would be identified and addressed through the City's annual programming and budgeting processes. Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time, as appropriate. LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the Community Plan area.

Moreover, even 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 similar to existing fire stations in the Project vicinity, and on lots that range from 0.75 to 2 acres in size consistent with Proposition F and Measure J, as described above; and (3) would be subject to the adoption of a Negative Declaration or Mitigated Negative Declaration, or could qualify for a statutory or categorical exemption, due to the limited environmental impacts associated with such a project.[28] Therefore, development of a station at this scale is unlikely to result in any significant impact, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

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[27] *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

[28] *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.*

With regard to cumulative impacts on fire protection services, consistent with the *City of Hayward v. Board of Trustees of California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b. above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, as discussed above, such facilities would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, the cumulative impact on fire protection services would be less than significant.

Based on the above, development of the Project and related projects would not result in a significant cumulative impact associated with an increase in fire protection services demand that would require a new fire station, or the expansion of an existing fire station, the construction of which could cause significant environmental impacts. As such, the cumulative impact on fire protection services would be less than significant.

(2) Mitigation Measures

The cumulative impact with regard to fire protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

The cumulative impact 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.