IV. Environmental Impact Analysis

J.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning (March 12, 2021), which is included in Appendix J.1 of this Draft EIR; and the *Utility Technical Report for New Beatrice West* (Utility Report), prepared by Barbara L. Hall, P.E., Inc. (September 22, 2022), which is included in Appendix M of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Occupational Safety and Health Administration
- Federal Emergency Management Act
- Disaster Mitigation Act of 2000
- California Building Code and California Fire Code
- California Fire Service and Rescue Emergency Aid System
- California Vehicle Code

- California Constitution Article XIII, Section 35
- California Governor's Office of Emergency Services
- City of Los Angeles Charter
- City of Los Angeles General Plan Framework Element
- City of Los Angeles General Plan Safety Element
- Community Plan
- Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

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

(b) Federal Emergency Management Act

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

(c) Disaster Mitigation Act of 2000

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

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

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

(2) State

(a) California Building Code and California Fire Code

The California Building Code (CBC, 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). CBC 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 2022 edition of the CBC became effective on January 1, 2023.[1] The building standards in the CBC apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. Typical fire safety requirements of the California Fire Code include the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC with local amendments, as discussed below.[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 California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[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, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All Cal OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES.[4]

---

[1] *CBC (CCR, Title 24, Part 2).*

[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 April 2019.*

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

(c) California Vehicle Code

Section 21806 of the California Vehicle Code (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 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. Board of Trustees 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."

---

[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.*

(e) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the Statewide mutual aid system (see discussion of Mutual Aid Agreements, above). Cal OES 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 (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services. Relevant goals, objectives, and policies of the Framework Element are provided in Table IV.J.1-1 on page IV.J.1-7. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element (Infrastructure and Public Services Chapter) specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and

Table IV.J.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, General Plan Framework Element, 2001.

infrastructure.[6] Objective 9.16 of the Infrastructure and Public Services Chapter requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 of the Infrastructure and Public Services Chapter 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 of the Infrastructure and Public Services Chapter requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 of the Infrastructure and Public Services Chapter requires the maintenance of the LAFD's ability to assure public safety in emergency situations.

Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from

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

neighborhood land uses is 1.5 miles.[7] This is consistent with the specifications for response distances within the LAMC.

(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 and updated November 24, 2021, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as shown in Table IV.J.1-2 on page IV.J.1-9.

(d) Palms–Mar Vista–Del Rey Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to fire protection required to support such growth. The community plans' maps depict the desired arrangement of land uses, as well as street classifications and the locations and characteristics of public service facilities.

The Project site is located within the Palms-Mar Vista-Del Rey Community Plan area.[8] The Palms–Mar Vista–Del Rey Community Plan, adopted on November 20, 1985 and updated in 1997, includes the following objective and policies that specifically relate to fire protection:

> **Objective 9-1:** Ensure that fire facilities and protective services are sufficient for the existing and future population and land uses.
>
> **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.

---

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

[8] *The Los Angeles Department of City Planning is currently in the process of updating the Community Plan and has presented draft land use concepts to the community beginning in July 2020. For purposes of this Draft EIR, the analysis is limited to the designations under the currently adopted Community Plan.*

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

Goal/ Objective/ Policy	Description
Policy 1.1.3	Facility/Systems Location and Maintenance. Locate new critical facilities and infrastructure outside of hazard areas, especially VHFHSZs, when feasible. If no feasible alternative site exists, ensure that these facilities incorporate all necessary protections to allow them to continue to serve essential community needs during and after disaster events. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions and the growing climate emergency.
Policy 1.1.6	State and Federal Regulations. Assure compliance with applicable State and federal planning and development regulations. Regularly adopt new provisions of the California Building Standards Code, Title 24, and California Fire Code into the LAMC to ensure that new development meets or exceeds Statewide minimums. Ensure new development in VHFHSZs adheres to the California Building Code, the California Fire Code, Los Angeles Fire Code and California Public Resources Code. Facilitate compliance with new standards for existing non-conforming structures and evacuation routes.
Policy 1.1.8	Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones. Ensure mitigations are incorporated for new development in hazard areas such as VHFHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.
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. Participate in regularly scheduled disaster exercises to better prepare Police, Fire, Public Works and other City employees with disaster responsibilities.
Policy 2.1.6	Standards/Fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression and safety. • Enforce peak water supply/fire flow requirements and ensure that new development is able to sufficiently source water, including in VHFHSZs. • Enforce minimum roadway widths and clearances for evacuation and fire suppression. • Maintain special fire-fighting units at the Port of Los Angeles, Los Angeles International Airport, and Van Nuys Municipal Airport capable of responding to special emergencies unique to the operations of those facilities. • Coordinate with CALFIRE, local fire agencies, fire safe councils, private landowners, and other responsible agencies to identify the best method(s) of fuel modification to reduce the severity of future wildfires, including: Prescribed fire; Forest thinning; Grazing; Mechanical clearing; Hand clearing (piling, burning/chipping); Education; and Defensible space. • 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.

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

Goal/ Objective/ Policy	Description
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination. Coordinate between city departments, county and state agencies, local jurisdictions and with appropriate private and public entities prior to a disaster 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.

Source: City of Los Angeles, General Plan Safety Element, 2021.

Policy 9-1.2: Encourage the Fire Department to locate fire service facilities in appropriate locations throughout the community to maintain safety.

(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.

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

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

smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

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

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

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

LAMC Section 57.4704.4.5.1 of the LAMC requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

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

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

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

LAMC Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas, with a minimum residual water pressure of 20

pounds per square inch (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.

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

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

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with 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 Proposition F projects have been completed.[9] Also, as reported in November 2019, the City of Los Angeles Bureau of Engineering (BOE) completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining savings and interest.[10] 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)

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

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

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.[11]

(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 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres.

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

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

b. Existing Conditions

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

The LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and

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

community services.[12] At any given time, a total of 1,018 firefighters are on 24-hour duty at fire department facilities citywide, including the 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction.[13]

As shown in Figure IV.J.1-1 on page IV.J.1-15, there is one LAFD fire stations located within a 2-mile radius of the Project site and four LAFD fire stations located outside the 2-mile radius.[14] The closest station to the Project site is Fire Station No. 67, which is the designated "first in" station, located approximately 1.3 miles southwest of the Project site at 5451 Playa Vista Drive.[15] As shown in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 67 consists of an assessment engine and basic life support (BLS) rescue ambulance, and a staff of six.[16]

Secondary fire stations that could serve the Project site include Fire Station No. 62, located 2.8 miles north of the Project site at 11970 Venice Boulevard; Fire Station No. 5, located 3.5 miles south of the Project site at 8900 Emerson Avenue; Fire Station No. 63, located 3.7 miles northwest of the Project site at 1930 Shell Avenue; and Fire Station No. 51, located 4.8 miles south of the Project site at 10435 Sepulveda Boulevard.[17] Fire Station No. 62 consists of an assessment engine, paramedic rescue ambulance, and a staff of 6; Fire Station No. 5 consists of a light force, assessment engine, paramedic rescue ambulance, EMS Battalion, back-up US&R apparatus, and a staff of 14; Fire Station No. 63 consists of a task force, paramedic rescue ambulance, and a staff of 12; and Fire Station No. 51 consists of an assessment engine, paramedic rescue ambulance, and a staff of 6.[18]

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

---

[12] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed March 17, 2023.*

[13] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed March 17, 2023.*

[14] *Distances are provided by LAFD based on 12541 West Beatrice Street. Source: Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

[15] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

[16] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

[17] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

[18] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

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

Source: Google Earth Pro, 2022; Eyestone Environmental, 2023.

Table IV.J.1-3
LAFD Fire Stations Located in the Project Vicinity

Station No., Location, and Community Served	Distance from Project Site[a]	Equipment	Staffing
Fire Station No. 67 5451 Playa Vista Drive Los Angeles, CA 90094	1.3 mile	• Ambulance Engine • BLS Rescue Ambulance	6
Fire Station No. 62 11970 Venice Boulevard Los Angeles, CA 90066	2.8 miles	• Assessment Engine • Paramedic Rescue Ambulance	6
Fire Station No. 5 8900 Emerson Avenue Los Angeles, CA 90045	3.5 miles	• Light Force • Assessment Engine • Paramedic Rescue Ambulance • EMS Battalion • Back-up US&R Apparatus	14
Fire Station No. 63 1930 Shell Avenue Los Angeles, CA 90291	3.7 miles	• Task Force • Paramedic Rescue	12
Fire Station No. 51 10435 Sepulveda Boulevard Los Angeles, CA 90045	4.8 miles	• Assessment Engine • Paramedic Rescue Ambulance	6

[a] *Distances are provided by LAFD based on 12541 West Beatrice Street.*

Source: Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.

The response times for 2023, shown in Table IV.J.1-4 on page IV.J.1-17, are one of the many factors considered when evaluating impacts to fire protection services, as LAFD has not established response time standards for emergency response or adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes 20 seconds for fire suppression response.[19]

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for

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

Table IV.J.1-4
Average EMS and Non-EMS Response Times (2023)

Station	Average Response Time to EMS Incident (Minutes:Seconds)	Average Response Time to Non-EMS Incident (Minutes:Seconds)
Fire Station No. 67	8:19	8:16
Fire Station No. 62	8:05	8:01
Fire Station No. 5	8:17	8:20
Fire Station No. 63	7:32	7:36
Fire Station No. 51	8:40	8:32
Citywide	7:21	7:08

[a] *Response times are based on January–September 2023 data.*

Source: LAFD, FireStatLA, Station 67 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=67&year=2023, accessed November 28, 2023; LAFD, FireStatLA, Station 62 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=62&year=2023, accessed November 28, 2023; LAFD, FireStatLA, Station 5 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=5&year=2023, accessed November 28, 2023; LAFD, FireStatLA, Station 63 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=63&year=2023, accessed November 28, 2023; LAFD, FireStatLA, Station 51 Response Metrics for 2023, www.lafd.org/fsla/stations-map?station=51&year=2023, accessed November 28, 2023; and LAFD, FireStatLA, Citywide Response Metrics for 2023, www.lafd.org/fsla/stations-map?year=2023, accessed November 28, 2023.

emergency vehicles traveling along designated City streets to aid in emergency response.[20] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[21]

According to the LAFD, although response time is considered in assessment of the adequacy of fire protection services, it is 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 fire protection and emergency services 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 Trustee of California State University* (2015) 242 Cal.App.4th 833, 847

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

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

ruling, the City has and will continue to meet its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services.

(2) Emergency Access

Vehicular access to the Project site, including emergency vehicle access, is provided along W. Beatrice Street and along Jandy Place, with one access driveway on Jandy Place, one service driveway on Jandy Place, and four driveways on W. Beatrice Street.

(3) Fire Water Infrastructure

As discussed in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, in addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Domestic water service is available in the vicinity of the Project site via LADWP water lines within the adjacent streets. According to the Utility Report, the Project site and vicinity are currently served by an existing 8-inch water main in Jandy Place, an 8-inch water main in Beatrice Street, and four fire hydrants near the Project site, including one hydrant at the southwest corner of Beatrice Street and Jandy Place, a hydrant at the north end of the cul-de-sac on Jandy Place, a hydrant at the southeast corner of Beatrice Street and Westlawn Avenue, and a hydrant at the northwest corner of Grosvenor Boulevard and Beatrice Street.[22]

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project site. In addition, the Project site is not located within a City-designated Very High Fire Hazard Severity Zone or Fire District No. 1.[23,24]

---

[22] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 22, 2022. Refer to Appendix M of this Draft EIR.*

[23] *City of Los Angeles, Department of City Planning, Zone Information and Map Access System, Parcel Profile Report for APNs 4211006009 and 4211006026.*

[24] *Fire District No. 1 consists of areas identified by the City that are required to meet additional development regulations to mitigate fire hazard-related risks.*

3. Project Impacts

a. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

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

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

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

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

b. Methodology

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

The need for or deficiency in adequate fire protection and emergency medical services in and of itself is not a CEQA impact but rather a social and/or economic impact. Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in that project's CEQA document. The ultimate determination of whether there is a significant impact to the environment related to fire protection and emergency medical services from a project is based on whether construction of new or expanded fire protection and emergency medical facilities is a reasonably foreseeable direct or indirect effect of the project.

In the event that the City determines that expanded or new emergency facilities are warranted, based on previous fire station improvements in the City, such facilities (1) would occur where allowed under the designated land use; (2) would likely be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

c. Project Design Features

As provided in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, as set forth in Project Design Feature WAT-PDF-1, the Project will replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection. In addition, as discussed in Section IV.K, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Applicant will implement a Construction Traffic Management Plan that will include provisions for maintaining emergency access to the Project site during construction.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. In most cases, implementation of good housekeeping procedures by the construction contractors and work crews would minimize these hazards. Specifically, in accordance with OSHA regulations set forth in 29 CFR, Part No. 1926, construction managers and personnel would be trained in emergency response and fire safety operations and fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.

Construction activities also have the potential to affect fire protection services by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. As provided in Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be prepared and implemented as part of the Project in accordance with Project Design Feature TR-PDF-1. The Construction Traffic Management Plan would ensure that adequate and safe access remains available within and near the Project site during construction activities. Temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions, would also be implemented as necessary to ensure adequate vehicular access is maintained in the surrounding streets. 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. In addition, partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic pursuant to CVC Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic.

Based on the above, Project construction would not affect fire protection services to the extent that new or physically altered fire facilities would be needed in order to maintain acceptable service ratios, response distances, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be less than significant.

(b) Operation

(i) Facilities and Equipment

The Project would include the development of 199,500 square feet comprised of 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. As part of the Project, the existing 23,072-square-foot office building and two accessory buildings of 5,044 square feet and 2,144 square feet at 12575 W. Beatrice Street would be removed, while the existing 87,881-square-foot office building at 12541 W. Beatrice Street would be retained. Based on the amount of new construction, the Project would increase the demand for LAFD fire protection services compared to existing conditions, which could, in turn, result in a need for new or physically altered government facilities.

The Project site would continue to be served by Fire Station No. 67, the "first-in" station for the Project site, located approximately 1.3 miles southwest of the Project site. As shown in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 67 is equipped with an assessment engine, BLS rescue ambulance, and a staff of six. As discussed above, LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, range from 0.75 mile for an engine company to 2 miles for a truck company. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems. Based on the response distances from existing fire stations and the type of equipment available at the fire station nearest the Project site, LAFD has concluded fire protection would be inadequate.[25] However, as stated by the LAFD in their letter, inclusion of the listed LAFD recommendations, along with any additional LAFD recommendations made during later reviews of the proposed project, will reduce the impacts to an acceptable level. The recommendations identified by the LAFD are consistent with the Fire Code and include:

- Requiring access for LAFD apparatus and personnel to and into all structures;
- Installation of one or more Knox Boxes (rapid entry system);
- Installation of building identification in new and existing buildings that is plainly legible and visible from the street or road fronting the property;
- Prohibiting the construction of a building or portion of a building more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane;

[25] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

- Locating the entrance to the main lobby off the address side of the building;

- Locating any required Fire Annunciator panel or Fire Control Room within a 20-foot visual line-of-sight of the main entrance stairwell or to the satisfaction of the LAFD; and

- Installation of approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

In addition to the above and in accordance with the LAMC, the proposed building would be required to have automatic fire sprinkler systems. Furthermore, as shown in Table IV.J.1-3 on page IV.J.1-16, although located beyond the specified response distance requirements, Fire Station Nos. 62, 5, 63, and 51 have been identified by the LAFD as capable of initial responses needed at the Project site.[26]

As discussed above, consistent with *City of Hayward v. Board of Trustees of California State* University (2015) 242 Cal.App.4th 833 and the requirements of the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. The City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services.

Further, the Project would implement Los Angeles Building and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to the issuance of a building permit. The Project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, and escalator openings or stairways.

The Project is a high-rise building as defined by LAFD (high-rise buildings greater than 75 feet in height [measured from the lowest point with fire access]). As a result,

[26] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

LAMC Section 57.4705.4 requires an emergency helicopter landing facility on the roof of each high rise 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. It is anticipated that the Project would comply with Option 2 of LAFD Requirement No. 10, with approval 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 J.1 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, 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 policies set forth in the General Plan Framework and Safety Elements, 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 and Policy 2.1.6 in the Safety Element), and coordinate the development of new fire facilities to be phased with growth (see Objective 9.18 in the Framework Element).

(ii) Emergency Access

Operation of the Project would not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project site. Furthermore, the area surrounding the Project site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project's traffic study area. Based on the Project site's location within a highly urbanized area of the City, the streets surrounding the Project site were designed

as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project site is not considered substandard. Additionally, drivers of emergency vehicles have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. As such, emergency access to the Project site and surrounding uses would be maintained at all times. Furthermore, the Project's driveway and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit.

(iii) Fire Flow

As described in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, domestic and fire water service to the Project site would continue to be supplied by LADWP. Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by development type. Based on LAMC Section 57.507.3.1 and Table 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute for low density residential developments to 12,000 gallons per minute for high density industrial and commercial (principal business districts or centers) developments.[27] Specifically, Low Density Residential developments have a required fire flow of 2,000 gallons per minutes from three adjacent fire hydrants flowing simultaneously; High Density Residential and Neighborhood Commercial developments have a required fire flow of 4,000 gallons per minute from four adjacent fire hydrants flowing simultaneously; Industrial and Commercial developments have a required fire flow of 6,000 gallons per minute to 9,000 gallons per minute from four to six fire hydrants flowing simultaneously; and High Density Industrial and Commercial (Principal Business Districts or Centers) developments have a required fire flow of 12,000 gallons per minute available to any block.

Based on the fire flow standards set forth by LAMC Section 57.507.3 and the proposed development of a new eight-story office building, the Project would fall under the Industrial and Commercial development type requiring a fire flow of 6,000 gallons per

[27] *American Legal Publishing. City of Los Angeles Municipal Code, https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-346882, accessed September 8, 2023.*

minute to 9,000 gallons per minute from four to six fire hydrants flowing simultaneously. However, based on consultation with the LAFD regarding the Project's potential impacts to LAFD's facilities and services, the LAFD determined that the fire flow requirement for the Project is 12,000 gallons per minute, which corresponds to the High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers) category. A fire flow of 12,000 gpm would require eight hydrants flowing simultaneously at 1,500 gpm each with a residual pressure of 20 psi. However, it is noted that this fire flow is based strictly on the Project site's zoning of M2-1 (Light Industrial, Height District 1), which is not representative of the scope of the Project. As such, as described in the Utility Report, when evaluating whether the existing infrastructure would have sufficient capacity to meet fire flow demands, the LADWP evaluated both a fire flow of 12,000 gpm, as well as a fire flow of 9,000 gpm from six hydrants flowing simultaneously at 1,500 gpm with a residual pressure of 20 psi, which would be more compatible with the proposed density and use of the Project site for commercial and office uses.

As discussed in the Utility Report, included as Appendix M of this Draft EIR, the Information of Fire Flow Availability Reports (IFFARs) submitted to LADWP shows there would be insufficient capacity in the existing water infrastructure system under either a 12,000 gpm fire flow or a 9,000 gpm fire flow and system upgrades would be necessary to meet either of the two required fire flow demands for the Project.[28] As specifically set forth in Project Design Feature WAT-PDF-1 included in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, the Project would replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow as determined necessary by LADWP. The specific improvements based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow and associated construction-related impacts are discussed further in Section IV.M.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR. As previously discussed, the Project would also incorporate a fire sprinkler suppression system in the proposed building to reduce or eliminate the public hydrant demands. Overall, with the proposed fire sprinkler system and implementation of the required improvements, adequate fire flow would be provided to the Project site to serve the Project, and impacts would be less than significant.

(iv) Conclusion

Based on the above analysis, the Project is not anticipated to generate a demand for additional fire facilities. Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered

[28] *Barbara L. Hall, P.E., Inc., Utility Technical Report for New Beatrice West, September 22, 2022. Refer to Appendix M of this Draft EIR.*

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. In addition, as part of the Project, required water system improvements would be installed to meet the fire flow demand of the Project. Therefore, impacts to fire protection during Project operation would be less than significant, and no mitigation measures are required.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts 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 are the service areas of Fire Station Nos. 67, 62, 5, 108, and 97. The Project, in conjunction with growth forecasted in the City through 2025 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection service, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2025 includes specific known development projects, growth that may be projected as a result of the land use designation and policy changes contained in the Palms–Mar Vista–Del Rey Community Plan Update, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, only one potential related project has been identified in the vicinity of the Project site for inclusion in the cumulative impact analysis for this EIR. This related project, known as Del Rey Pointe, is located at 5000 S. Beethoven Street and includes the development of 236 multi-family residential apartment units. The increase in development and service populations from the Project, related project, as well as other future development in the Palms–Mar Vista–Del Rey Community Plan area could result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services resulting in a need for new or physically altered government facilities if the Project, together with other development in

the service area. However, similar to the Project, the related project and other future development projects in the Palms–Mar Vista–Del Rey Community Plan area would comply with LAFD requirements for design and construction and be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, the related project and other future development projects in the Palms–Mar Vista–Del Rey Community Plan area would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related project, and other future development projects in Palms–Mar Vista–Del Rey 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. The Project and the related project would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board of Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City and the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate. The *Hayward* ruling also concluded the "city has a constitutional obligation to provide adequate fire protection services. Assuming the city continues to perform its obligations, there is no basis to conclude that the project will cause a substantial adverse effect on human beings." Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. LAFD has no known or proposed plans to expand fire facilities or construct new facilities in the area.[29] However, as previously discussed, if LAFD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would likely be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and, therefore, would not be expected to result in significant impacts.[30] Further analysis, including a

[29] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021.*

[30] *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.*

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

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

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures are required, and the impact levels remains less than significant.