IV. Environmental Impact Analysis

G.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 H of this Draft EIR; and the *1000 Seward Mixed-Use Project Utility Infrastructure Technical Report: Water* (Water Utility Report), prepared by LFA Consulting Engineers (April 2021), 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 Safety Element
- Hollywood 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 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

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 United States 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 United States Fire Administration.

(c) Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 (42 United States Code [USC] Section 5121) (Act) 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 Section 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and create 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 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 California Office of Emergency Services (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 California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.[5] This section of the CVC states the following:

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

2 *LAFD, 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 *LAFD, 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.*

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

(d) California Constitution Article XIII, Section 35

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

(e) California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; CCR, Title 19, Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the State's

preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead State agency for emergency management in the State. It also serves as the lead agency for mobilizing the State's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the statewide mutual aid system (see discussion of Mutual Aid Agreements, above). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

(3) Local

(a) City of Los Angeles Charter

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

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines Citywide policies regarding land use, including infrastructure and public services. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood 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 Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land

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

uses is 1.5 miles.[7] This is consistent with the specifications for response distances within the LAMC, discussed below. The relevant General Plan fire protection goals, objectives, and policies are included in Table IV.G.1-1 on page IV.G.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 nearest disaster routes to the Project Site are Santa Monica Boulevard (0.1 mile) to the north and Beverly Boulevard (0.8 mile) to the south.[8] The relevant General Plan Safety Element emergency response (multi-hazard) goals, objectives, and policies are included in Table IV.G.1-2 on page IV.G.1-9.

(d) Hollywood 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.E, Land Use, of this Draft EIR, the Project is located within the Hollywood Community Plan area.[9] The Hollywood Community Plan, adopted on

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

[8] *Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities & Lifeline Systems, p. 61.*

[9] *The City is currently in the process of updating the Hollywood Community Plan. The most recent draft was released in February 2021 and is available at https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan. The City Planning Commission recommended approval of the draft Plan on March 18, 2021, the Department of City Planning released the letter of determination on August 18, 2021, and the draft plan is currently awaiting consideration by the City's Planning and Land Use Management committee.*

Table IV.G.1-1
Relevant General Plan Fire Protection Goals, Objectives, and Policies—General Plan Framework Element: 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.

December 13, 1988, and readopted in 2014, includes the following policies that relate to fire protection:

- Policy 1: That the various components of the fire protection/emergency medical services system be continually evaluated and updated by the Fire Department in coordination with other City departments, as fire protection techniques, apparatus, needs and land use patterns change.

- Policy 2: That the expansion of existing fire station and the acquisition of new sites be planned and designed to minimize the displacement of housing and relocation of residents.

- Policy 3: That public education activities concerning the elimination of fire hazards, methods of fire protection and emergency medical service be encouraged.

- Policy 4: That the existing paramedic program be continually evaluated, updated and improved.

Table IV.G.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.G.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.

- Policy 5: That the City intensify its program of fire protection through weed abatement.

(e) Los Angeles Municipal Code

The Los Angeles Fire Code (Los Angeles Municipal 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.

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 in a location approved by the Fire 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.[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) 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 included 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

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

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

Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.

(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. As of April 2022, the Strategic Plan 2018-2020 is the most current available.

b. Existing Conditions

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

LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.[12] There are 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction.[13] In addition, the LAFD is supported by 1,018 firefighters and 381 technical and administrative personnel.[14]

As shown in Figure IV.G.1-1 on page IV.G.1-14, there are four LAFD fire stations located within a 2-mile radius of the Project Site, and one outside the 2-mile radius. The closest station to the Project Site is Fire Station No. 27, which is the designated "first in" station, located approximately 0.6 mile northeast of the Project Site at 1327 N. Cole Avenue.[15] As shown in Table IV.G.1-3 on page IV.G.1-15, Fire Station No. 27 consists of a

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[12] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed March 16, 2021.*

[13] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed March 16, 2021.*

[14] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed March 16, 2021.*

[15] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.*

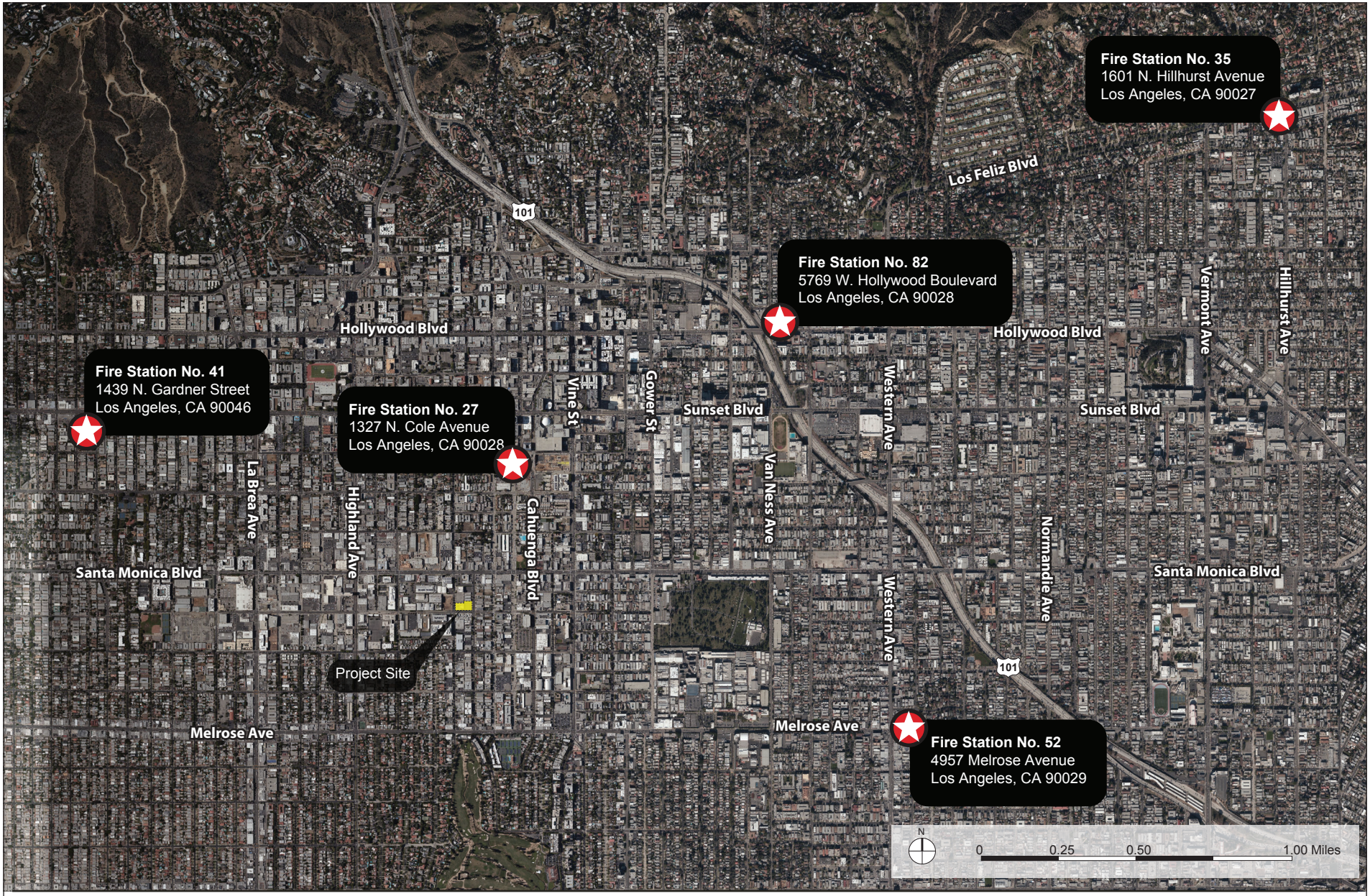

Figure IV.G.1-1
Fire Stations in the Vicinity of the Project Site

Source: Apple Maps, 2021; Eyestone Environmental, 2021.

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

Station No., Location, and Community Served	Distance from Project Site	Equipment	Staffing
Fire Station No. 27 1327 N. Cole Avenue Los Angeles, CA 90028	0.6 mile	• Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Urban Search and Rescue	16
Fire Station No. 41 1439 N. Gardner Street Los Angeles, CA 90046	1.7 miles	• Engine • Paramedic Rescue Ambulance • Brush Patrol	6
Fire Station No. 52 4957 Melrose Avenue Los Angeles, CA 90029	1.8 miles	• Assessment Engine • Paramedic Rescue Ambulance	6
Fire Station No. 82 5769 W. Hollywood Boulevard Los Angeles, CA 90028	1.9 miles	• Engine • Paramedic Rescue Ambulance	6
Fire Station No. 35 1601 N. Hillhurst Avenue Los Angeles, CA 90027	3.4 miles	• Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Brush Patrol	14

Source: Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.

task force, paramedic rescue ambulance, basic life support (BLS) rescue ambulance, and urban search and rescue, and a staff of 16.[16]

Secondary fire stations that serve the Project Site include Fire Station No. 41, located 1.7 miles northwest of the Project Site at 1439 N. Gardner Street; Fire Station No. 52, located 1.8 miles southeast of the Project Site at 4957 Melrose Avenue; Fire Station No. 82, located 1.9 miles northeast of the Project Site at 5769 W. Hollywood Boulevard; and Fire Station No. 35, located 3.4 miles northeast of the Project Site at 1601 N. Hillhurst Avenue.[17] Fire Station No. 41 consists of a task force, paramedic rescue ambulance, BLS rescue ambulance, and urban search and rescue, and a staff of six; Fire Station No. 52 consists of an assessment engine and paramedic rescue ambulance, and a staff of six; Fire Station No. 82 consists of an engine and paramedic rescue ambulance, and a staff of

[16] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.*

[17] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.*

six; and Fire Station No. 35 consists of an assessment light force, paramedic rescue ambulance, BLS rescue ambulance and brush patrol, and a staff of 14.[18]

The response times for January to December 2021, shown in Table IV.G.1-4 on page IV.G.1-17, are provided for informational purposes since 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 (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[20] The City has over 205 miles of major arterial routes that are equipped with FPS.[21] According to the LAFD, although response time is considered an 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 ruling, the City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services and the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

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[18] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.*

[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.*

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

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

Table IV.G.1-4
Average EMS and Non-EMS Response Times (2021)

Station	Average Response Time to EMS Incident (Minutes:Seconds)	Average Response Time to Non-EMS Incident (Minutes:Seconds)
Fire Station No. 27	6:37	5:54
Fire Station No. 41	7:05	6:56
Fire Station No. 52	6:28	5:47
Fire Station No. 82	6:57	6:35
Fire Station No. 35	6:09	5:54
Citywide	6:55	6:33

[a] *Response times are based on January–December 2021 data.*

Source: LAFD, FireStatLA, Station 27 Response Metrics for 2021 www.lafd.org/fsla/stations-map?station=27&year=2021, accessed March 17, 2022; LAFD, FireStatLA, Station 41 Response Metrics for 2021, www.lafd.org/fsla/stations-map?station=41&year=2021, accessed March 17, 2022; LAFD, FireStatLA, Station 52 Response Metrics for 2021, www.lafd.org/fsla/stations-map?station=52&year=2021, accessed March 17, 2022; LAFD, FireStatLA, Station 82 Response Metrics for 2021, www.lafd.org/fsla/stations-map?station=82&year=2021, accessed March 17, 2022; LAFD, FireStatLA, Station 35 Response Metrics for 2021, www.lafd.org/fsla/stations-map?station=35&year=2021, accessed March 17, 2022; and LAFD, FireStatLA, Citywide Response Metrics for 2021, www.lafd.org/fsla/stations-map?year=2021, accessed March 17, 2022.

(2) Emergency Access

Vehicular access to the Project Site is currently provided via driveways along Romaine Street and Hudson Avenue.

(3) Fire Water Infrastructure

As discussed in Section IV.G.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) 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 Water Utility Report included in Appendix M of this Draft EIR, there are 8-inch water mains in Seward Street, Romaine Street, and Hudson Avenue.[22]

[22] *LFA Consulting Engineers, 1000 Seward Mixed-Use Project Utility Infrastructure Technical Report: Water, April 2021, page 3. Refer to Appendix M of this Draft EIR.*

(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]

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

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[23] *City of Los Angeles Department of City Planning, ZIMAS, http://zimas.lacity.org/, accessed March 15, 2021.*

[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.*

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 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. 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

No Project Design Features are proposed with respect to fire protection. However, as discussed in Section IV.H, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-2, the Applicant would implement a Construction Traffic Management Plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (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. 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. These impacts would be less than significant for the following reasons:

- Construction impacts are inherently temporary in nature and do not cause lasting effects that would impact LAFD fire protection services.
- 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.
- 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 California Vehicle Code (CVC) Section 21806, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic.
- Impacts that could temporarily affect emergency response are addressed through the Construction Traffic Management Plan, prepared for the Project pursuant to Project Design Feature TR-PDF-2 in Section IV.H, Transportation, of this Draft EIR. Project Design Feature TR-PDF-2 will ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

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, the construction of which could cause significant environmental impacts, 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 Site would continue to be served by Fire Station No. 27, the "first-in" station for the Project Site, located approximately 0.6 mile northeast of the Project Site. As shown in Table IV.G.1-3 on page IV.G.1-15, Fire Station No. 27 is equipped with a task force, paramedic rescue ambulance, BLS rescue ambulance and urban search and rescue, and a staff of 16. Fire Station No. 41, located 1.7 miles northwest of the Project Site, is equipped with an engine, paramedic rescue ambulance, and brush patrol, and staff of six. Fire Station No. 52, located 1.8 miles southeast of the Project Site, is equipped with an assessment engine and paramedic rescue ambulance, and staff of six. In addition, Fire Station No. 82, located 1.9 miles northeast of the Project Site, is equipped with an engine and paramedic rescue ambulance, and staff of six As such, based on the response distance from existing fire stations, LAFD considers fire protection to be adequate.[25] Furthermore, as shown in Table IV.G.1-3, although located beyond the specified response distance requirements, Fire Station No. 35 has been identified by the LAFD as capable of initial responses needed at the Project Site.

The Project would demolish both existing buildings on the Project Site and develop 136,200 square feet of office uses, 12,200 square feet of restaurant uses (of which 6,100 square feet may be used for an entertainment use), and 2,200 square feet of retail uses. Based on employee generation factors from the Los Angeles Department of Transportation (LADOT) and the Department of City Planning, the Project is estimated to generate approximately 584 net new employees on the Project Site.[26] Therefore, the Project's population would increase the demand for LAFD fire protection services.

However, the Project would implement City 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

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[25] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.*

[26] *Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020.*

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. As a result, 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 . Here, the high rise buildings 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 City 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. 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 General Plan Framework and Safety Element, 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 General Plan Framework 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 General Plan Framework).

(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, and the increase in traffic generated by the Project would not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes. 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.J.1, Utilities and Service Systems—Water Supply, 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. According to LAFD, the Project falls within the High Density Industrial and Commercial category, which has a required fire flow of 12,000 gallons per minute (gpm) available to any block with a residual pressure of 20 pounds per square inch (psi). Where local conditions indicate consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required.

As discussed in the Water Utility Report, included as Appendix M of this Draft EIR, the Information of Fire Flow Availability Report (IFFAR) submitted to LADWP shows eight nearby hydrants flowing simultaneously for a combined 11,700 gpm. As shown by the IFFAR, the Project would not have adequate fire flow available to provide 12,000 gpm as

required by LAFD and LAMC Section 57.507.3.[27] Fire hydrant F-35522 is currently connected to a 6-inch water main in Eleanor Avenue and is capable of delivering 1,200 gpm rather than the required 1,500 gpm. However, LADWP has stated that relocating the fire hydrant connection to the 8-inch water main on Seward Street would allow the fire hydrant to produce the required 1,500 gpm. Once the connection has been relocated, fire flow will be sufficient to serve the Project as required by LAFD. As with construction of the Project, impacts associated with this relocated connection 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 Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-2 discussed in Section IV.H, 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.

In addition, the Project would install a fire sprinkler suppression system in the proposed building to reduce or eliminate the public hydrant demands.[28] Per LAMC 94.2020.0, which adopts by reference NFPA 14-2013, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building is 1,250 gpm. Because the Service Advisory Request submitted to LADWP confirms there is sufficient pressure to serve the Project, adequate water pressure is available to operate the proposed fire sprinkler suppression system.

(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 fire facilities, need for new or physically altered fire 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, impacts to fire protection during Project operation would be less than significant, and no mitigation measures are required.

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[27] *LFA Consulting Engineers, 1000 Seward Mixed-Use Project Utility Infrastructure Technical Report: Water, April 2021. Refer to Appendix M of this Draft EIR.*

[28] *LFA Consulting Engineers, 1000 Seward Mixed-Use Project Utility Infrastructure Technical Report: Water, April 2021. Refer to Appendix M of this Draft EIR.*

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, 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. 27, 41, 52, 82, and 35. 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 Hollywood Community Plan Update, as well as general ambient growth projected to occur.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 16 is a conservative assumption, as some of the related projects may not be built out by 2025 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. Furthermore, this analysis does not account for the removal of the existing uses. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 16 are fully built out by 2025, unless otherwise noted. In addition, Related Project No. 17, the Hollywood Community Plan Update is also included in the forecast. The Hollywood Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is anticipated to be completed in 2025, well before the Hollywood Community Plan Update's horizon year. Moreover, 2025 is a similar projected buildout year as many of the related projects identified below. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update upon its adoption

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 27, 41, 52, 82, and 35. The increase in development and service populations from the Project, the related projects, as well as other future development in the Hollywood Community Plan area would 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, did not comply with LAFD requirements for design and construction. However, similar to the Project, the related projects and other future development projects in the Hollywood Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented. Furthermore, each related project and other future development projects in the Hollywood Community Plan area would be required to comply with regulatory requirements related to fire protection services. In addition, the Project, related projects, and other future development projects in the Hollywood 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. Furthermore, given that the Project Site is located within an urban area, each of the related projects identified in the area, as well as other future developments, would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. The Project and the 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 by the City.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 3.b.(1) 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 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 the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, would not result from development of the Project together with the related projects, 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 level remains less than significant.

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[29] *Written correspondence from Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, March 12, 2021. Refer to Appendix H of this Draft EIR.*

[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.*