

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 Los Angeles Department of City Planning (DCP) dated September 30, 2022, which is included in Appendix H.1 of this Draft EIR; and the Utility Technical Report: Water and Energy (Utility Report) dated October 2023 and prepared by KPFF Consulting Engineers, which is included in Appendix K 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
- Central City Community Plan
- Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2023–2026

(1) Federal

(a) Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA and 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 Agency

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

The 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 Mutual 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

(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:

¹ *CBC (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. 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.”

(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 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.G.1-1, Relevant General Plan Framework Element Infrastructure and Public Services Goals, Objectives, and Policies, on page IV.G.1-7. As provided therein, 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

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

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

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.
<hr/> <p><i>Source: City of Los Angeles, General Plan Framework Element, 2001.</i></p>	

the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles.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 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.G.1-2, Relevant General Plan Safety Element Goals, Objectives, and Policies on page IV.G.1-8.

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

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

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. <ul style="list-style-type: none"> • 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.
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 General Plan Safety Element Goals, Objectives, and Policies**

Goal/Objective/ Policy	Description
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.
<p>Source: City of Los Angeles, General Plan Safety Element, 2021.</p>	

(d) Central City Community Plan

The Land Use Element of the City’s General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City’s Framework Element 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 and Planning, of this Draft EIR, the Project Site is located within the Central City Community Plan (Community Plan) area. The Central City Community Plan, last updated in 2003, includes the following objectives and policies that are relevant to fire protection:

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

(e) Los Angeles Municipal Codes

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 City of Los Angeles Department of Building and Safety (LADBS): 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 LADBS 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 57.4704.5.1 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 to 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 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 (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required), with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

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 LAMC 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.⁸ Also, as reported in November 2019, the City's Department of Public Works, 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.⁹ Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated \$600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.¹⁰

(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.

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

⁹ *City of Los Angeles Department of Public Works, Bureau of Engineering, Newsletter No. 20-5, November 6, 2019.*

¹⁰ *City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report—February/March 2016.*

(h) Los Angeles Fire Department Strategic Plan 2023–2026

The Los Angeles Fire Department Strategic Plan 2023–2026, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD’s organizational vision. The Strategic Plan 2023–2026 builds upon the progress of the previous Strategic Plan from 2018–2020. As provided in the Strategic Plan 2023–2026, seven goals will guide the LAFD for the next three years: (1) deliver exceptional public safety and emergency services; (2) promote a safe, healthy, and progressive work environment that effectively manages personal and organizational risk; (3) commit to an organization that embraces diversity, equity, and inclusion; (4) improve collaboration, participative leadership, and responsible performance management; (5) foster personal, professional development and organizational succession; (6) explore, implement and integrate technological innovations and advancements; and (7) enhance community resilience, disaster recovery capabilities, and environmental sustainability.

b. Existing Conditions

(1) Fire Protection Services and Facilities

The LAFD serves as the City’s life safety agency with approximately 3,510 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across the LAFD’s approximately 469-square-mile jurisdiction. At any given time, a total of 1,018 firefighters are on 24-hour duty. In addition, the LAFD is supported by 392 technical and administrative personnel.¹¹

As shown in Figure IV.G.1-1 on page IV.G.1-14, there are five LAFD fire stations located within a 2-mile radius of the Project Site. The closest station to the Project Site, which is the designated “first-in” station, is Fire Station No. 3, located approximately 1 mile northeast of the Project Site at 108 North Fremont Avenue. As provided by the LAFD and summarized in Table IV.G.1-3 on page IV.G.1-17, Fire Station is No. 3 consists of a task force, which includes an aerial ladder fire engine/truck company and two single engines, a paramedic rescue ambulance, a basic life support (BLS) rescue ambulance, an emergency lighting unit, a command post vehicle, a medical supply trailer, a back-up Urban Search and Rescue (US&R) apparatus, and a staff of 18.

¹¹ LAFD, *Our Mission*, www.lafd.org/about/about-lafd/our-mission, accessed October 3, 2023.



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

**Table IV.G.1-3
LAFD Stations Located in the Vicinity of the Project Site**

Station No., Location, and Community Served	Distance from Project Site	Equipment/Team	Staffing
Fire Station No. 3 108 N. Fremont Ave. Los Angeles, CA 90012	1.0 mile	<ul style="list-style-type: none"> • Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance • Emergency Lighting Unit • Command Post Vehicle • Medical Supply Trailer • Back-up US&R Apparatus 	• 18 staff
Fire Station No. 11 1819 W. 7th St. Los Angeles, CA 90057	1.0 mile	<ul style="list-style-type: none"> • Assessment Task Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance 	• 14 staff
Fire Station No. 9 430 E. 7th St. Los Angeles, CA 90014	1.1 miles	<ul style="list-style-type: none"> • 2 Assessment Engines • BLS Truck • 2 Paramedic Rescue Ambulances • BLS Rescue Ambulance 	• 19 staff
Fire Station No. 10 1335 S. Olive Street Los Angeles, CA 90015	1.1 miles	<ul style="list-style-type: none"> • Assessment Light Force • Paramedic Rescue Ambulance • BLS Rescue Ambulance 	• 14 staff
Fire Station No. 4 450 E. Temple Los Angeles, CA 90012	1.8 miles	<ul style="list-style-type: none"> • Assessment Engine • BLS Rescue Ambulance • ALS Rescue Ambulance • EMS Battalion Captain • Battalion Chief 	• 11 staff
<p><i>Source: Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal, to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.</i></p>			

As identified by the LAFD, secondary fire stations that serve the Project Site include Fire Station Nos. 11, 9, 10, and 4.¹² Fire Station No. 11, which is located approximately 1 mile northwest of the Project Site at 1819 West 7th Street, consists of an assessment task force, paramedic rescue ambulance, a BLS rescue ambulance, and a staff of 14.¹³ Fire Station No. 9, which is located approximately 1.1 miles southeast of the Project Site at 430 East 7th Street, consists of two assessment engines, a BLS truck, two paramedic

¹² Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.

¹³ Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.

rescue ambulances, a BLS rescue ambulance, and a staff of 19.¹⁴ Additionally, Fire Station No. 10, which is located approximately 1.1 miles southwest of the Project Site at 1335 South Olive Street, consists of a paramedic rescue ambulance, a BLS rescue ambulance, an assessment light force, and a staff of 14.¹⁵ Lastly, Fire Station No. 4, located approximately 1.8 miles east of the Project Site at 450 East Temple Street, consists of an assessment engine, a Battalion Chief, a BLS rescue ambulance, an advanced life support rescue ambulance, an emergency medical services (EMS) Battalion Captain, and a staff of 11.¹⁶

The response times for January to December 2022 are shown in Table IV.G.1-4 on page IV.G.1-17. 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 aid in emergency response.¹⁷

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 the path of an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.¹⁸ The City has over 205 miles of major arterial routes that are equipped with FPS.¹⁹

According to the LAFD, although response times may be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area, in considering its ability to respond to fires and life and health safety emergencies. If the number of incidents in a given area

¹⁴ Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.

¹⁵ Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.

¹⁶ Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.

¹⁷ LADOT, Los Angeles Signal Synchronization Fact Sheet.

¹⁸ LADOT, Los Angeles Signal Synchronization Fact Sheet.

¹⁹ LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

**Table IV.G.1-4
Average Emergency Medical Service and Structure Fire Response Times**

Station	Average Response Time to Emergency Medical Service Incident (Minutes:Seconds)	Average Response Time to Non-Emergency Medical Services (Minutes:Seconds)
Fire Station No. 3	7:12	6:12
Fire Station No. 11	6:28	5:54
Fire Station No. 9	6:52	6:32
Fire Station No. 10	7:14	6:40
Fire Station No. 4	7:15	6:53

^a Response times are based on January 2022–December 2022 data.

Source: LAFD: FireStatLA, Station 3 Response Metrics for January 2022–December 2022, www.lafd.org/fsla/stations-map?station=3&year=2022, accessed October 3, 2023; FireStatLA, Station 11 Response Metrics for January 2022–December 2022, www.lafd.org/fsla/stations-map?station=11&year=2022, accessed October 3, 2023; FireStatLA, Station 9 Response Metrics for January 2022–December 2022, www.lafd.org/fsla/stations-map?station=9&address=700%20S%20FLOWER%20ST&year=2022, accessed October 3, 2023; FireStatLA, Station 10 Response Metrics for January 2022–December 2022, www.lafd.org/fsla/stations-map?station=10&year=2022, accessed October 3, 2023; FireStatLA, Station 4 Response Metrics for January 2022–December 2022, www.lafd.org/fsla/stations-map?station=4&year=2022, accessed October 3, 2023.

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), the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

(2) Emergency Access

As described in Section II, Project Description, of this Draft EIR, emergency vehicle access to the Project Site is currently available via the drop-off lane along 7th Street.

(3) Fire Water Infrastructure

In addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City of Los Angeles Fire Code (LAMC Chapter V, Article 7). Water service is currently provided to the Project Site via LADWP water lines within adjacent streets. Specifically, as detailed in the Utility Report, there is an 8-inch water main located approximately 20 feet northwest from the Hope Street centerline. In addition, there are eight existing LADWP fire

hydrants in the immediate vicinity of the Project Site. Specifically, public fire hydrants are located on the northwestern and northeastern corners of the 8th Street and Hope Street intersection and on the northeastern and northwestern corners of the 8th Street and Flower Street intersection (total of four hydrants). There are also two hydrants located at the midpoint between 7th Street and 8th Street along Hope Street and Flower Street, respectively. Two additional public fire hydrants are located at the southeastern corner of the 7th Street and Flower Street intersection and the southwest corner of the 7th Street and Hope Street intersection. Furthermore, the existing buildings within the Project Site are also equipped with fire sprinkler systems.

(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.²⁰ Therefore, the Project Site is not located within a fire hazard area.²¹

3. Project Impacts

a. Thresholds of Significance

In accordance with Appendix G of the State 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 provided 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 threshold question.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate impacts to fire protection:

²⁰ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for APNs 5144-010-401, -405, -408, -421, -422, -423, and -425.

²¹ Refer to Section VI, Other CEQA Considerations, of this Draft EIR, for a discussion of wildfire impacts.

- 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 and emergency medical services, are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effect on fire protection and emergency medical services.

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in that project's CEQA document. In the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 acre and 1 acre in size, and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or Mitigated Negative Declaration (MND). However, the ultimate determination of the Project's impacts related to fire protection is based on whether construction of new or expanded fire protection facilities would be a reasonably foreseeable direct or indirect effect of the Project. Since there are no current capital improvement plans for the construction or expansion of fire facilities in the Project vicinity, 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 regard to fire protection. However, as provided in Section IV.J.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, as set forth in Project Design Feature WAT-PDF-1, the Project will upgrade a portion

of the existing 8-inch water main on Hope Street to a 12-inch main. In addition, as discussed in Section IV.H, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project would implement a Construction Traffic Management Plan (CTMP) that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction

Construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. Given the nature of construction activities and the work requirements of construction personnel, OSHA developed safety and health provisions for implementation during construction, which are set forth in 29 CFR, Part 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.²² Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.²³ Project construction would also occur in compliance with all applicable federal, State, and local requirements

²² United States Department of Labor, Occupational Health and Safety Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 4, 2023.

²³ United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 4, 2023.

concerning the handling, disposal, use, storage, and management of hazardous materials. Compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials, thereby reducing the potential demand on fire protection services at the Project Site during construction.

Project construction activities also have the potential to affect the provision of existing LAFD services in the vicinity of the Project Site by adding construction traffic to the street network and by encroaching on the public right-of-way. Specifically, as discussed in Section IV.H, Transportation, of this Draft EIR, it is expected that construction fences may encroach into the public right-of-way and the sidewalk, and one travel lane on Hope Street would temporarily be utilized as a staging area for construction equipment adjacent to the Project Site. These short-term and temporary construction activities could temporarily increase response times for emergency vehicles due to travel time delays caused by traffic during the Project's construction phase. However, as noted above in Subsection 3.c. Project Design Features, a CTMP would be prepared for the Project pursuant to Project Design Feature TR-PDF-1, which would ensure that adequate and safe access would remain available within and near the Project Site during construction activities. As part of the CTMP, the majority of construction-related traffic, including hauling activities, would occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. The Project would also employ temporary traffic controls, such as flag persons, to manage 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 on adjacent rights-of-way are maintained. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, construction of the Project would not require a new fire station or the expansion of an existing facility in order to maintain service, the construction of which would cause significant environmental impacts. Therefore, impacts with respect to fire protection services during Project construction would be less than significant.

(b) Operation

(i) Facilities and Equipment

Following construction of the Project, the Project Site would continue to be served by Fire Station No. 3, which is the designated "first-in" station for the Project, located

approximately 1 mile northwest of the Project Site at 108 North Fremont Avenue. As provided by the LAFD and summarized in Table IV.G.1-3 on page IV.G.1-15, Fire Station No. 3 is equipped with a task force, a paramedic rescue ambulance, a BLS rescue ambulance, an emergency lighting unit, a command post vehicle, a medical supply trailer, a back-up US&R apparatus, and a staff of 18. As discussed above, LAMC 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.²⁴ However, as stated in their letter, LAFD has also concluded that inclusion of the listed LAFD recommendations, along with any additional LAFD recommendations made during later reviews of the Project, would reduce the impacts to an acceptable level. The recommendations identified by the LAFD include, but are not limited to, the following:

- 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;
- Locating the entrance to a residential lobby within 50 feet of the desired street address curb face;
- 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.

²⁴ Los Angeles Fire Department, Bureau of Fire Prevention and Public Safety, Written correspondence from Orin Saunders, Fire Marshal to Vincent Bertoni, AICP, Director of Planning, September 30, 2022.

In addition to the above and in accordance with the LAMC Section 57.512.1, the tower would be required to have automatic fire sprinkler systems. Refer to pages 5 through 9 of Appendix H.1 of this Draft EIR for the complete list of recommendations.

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct 466 new residential units. Based on generation factors from the LADOT's VMT Calculator, the Project would generate approximately 1,049 residents.²⁵ Therefore, the Project's population would increase the demand for LAFD fire protection services, which could, in turn, result in a need for new or physically altered government facilities.

However, 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, as well as those recommendations set forth in the written correspondence from the LAFD included in Appendix H.1 of this Draft EIR. 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 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, 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. The Project proposes to comply with Option 2 of LAFD Requirement No. 10, with approval from the Fire Marshal and provide the life safety elements discussed above.

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 that would reduce the demand on LAFD facilities and equipment resulting from the Project are provided. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and, therefore, reduce the demand for fire protection services. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Central City Community Plan, as listed in

²⁵ *City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.*

the Subsection 2.a(3)(b)-(d)above, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 6.1.1 of the Central City Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Given these procedures and policy directives, as well as LAFD's continued evaluation of existing fire facilities, Project impacts with regard to LAFD facilities and equipment would be less than significant. In addition, as discussed above, consistent with *City of Hayward v. Board 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 2.d 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.

(ii) Emergency Access

As discussed in Section II, Project Description, of this Draft EIR, emergency access to the new tower would occur along Hope Street, near the residential lobby entrance. 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, arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation in the Project 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. The Project would not modify existing driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. Overall, emergency access to the Project Site and surrounding area would be maintained at all times, and impacts with regard to emergency access would be less than significant.

(iii) Fire Flow

As discussed in the Utility Report included as Appendix K of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project Site would be required to meet City fire flow requirements as set forth in LAMC Section 57.507.3.1, which establishes fire flow standards by development type. As identified by the LAFD in their written correspondence provided in Appendix H.1 of this Draft EIR, the required fire water flow for the Project has been set at 12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, additional 2,000 to 8,000 gpm will be required). A minimum residual water pressure of 20 psi is to remain in the water system. In addition, all hydrants must be spaced to provide adequate coverage of building exterior.

As discussed in the Utility Report, an Information of Fire Flow Availability Report (IFFAR) was submitted to LADWP to determine if the existing public water system will have adequate water pressure to serve the Project's anticipated fire and domestic water needs. Based on the completed IFFAR (see Exhibit 1 of Appendix K of this Draft EIR), the Project Site has inadequate fire flow available to demonstrate compliance with LAMC Section 57.507; therefore, system upgrades would be necessary to meet the fire flow demand for the Project.²⁶

According to the NFPA, the installation of an approved sprinkler system can reduce the required fire flow, thereby reducing the demand on nearby public hydrants. As discussed above, in accordance with LAMC Section 57.512.1, the Project would incorporate a fire sprinkler suppression system in the proposed tower, which would reduce the demand on nearby public hydrants. In addition, as set forth in Project Design Feature WAT-PDF-1 included in Section IV.J.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR, the Project would upgrade the existing 8-inch water main on Hope Street to a 12-inch main. Required improvements and associated construction-related impacts are discussed further in Section IV.J.1, Utilities and Service Systems—Water Infrastructure, of this Draft EIR. With implementation of the required improvements, adequate fire flow would be provided to the Project Site to serve the Project, and impacts with regard to fire flow would be less than significant.

(iv) Conclusion

Based on the analysis above, the operation of the Project would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Additionally, as concluded in the written correspondence from the LAFD included

²⁶ *KPFF Consulting Engineers, The Bloc Residential Tower Utility Technical Report: Water and Energy, October 2023.*

in Appendix H.1 of this Draft EIR, with the implementation of the recommendations set forth therein along with any additional recommendations that could be made during later reviews of the Project as part of the normal building permit process, potential impacts to fire protection services would be addressed. **Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. 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.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

e. Cumulative Impacts

(1) Impact Analysis

The geographic context for the cumulative impact analysis for fire protection services is the service areas of Fire Station Nos. 3, 11, 9, 10, and 4. The Project, in conjunction with growth forecasted in the City through 2031 (i.e., the Project buildout year), would cumulatively generate a demand for fire protection services, thus potentially resulting in cumulative impacts on fire protection facilities. Cumulative growth in the greater Project area through 2031 includes specific known development projects, as well as general ambient growth, as described in Section III, Environmental Setting, of this Draft EIR.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 44 is a conservative assumption, as some of the related projects may not be built out by 2031 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 44 are fully built out by 2031, unless otherwise noted.

A number of the identified related projects all within the service areas of Fire Station Nos. 3, 11, 9, 10, and 4. The increase in development and service populations from the Project, related projects, and other future development in the Central City Community Plan area would result in a cumulative increase in the demand for LAFD services. As concluded in the written correspondence from the LAFD included in Appendix H.1 of this Draft EIR, development of the Project, as well as the related projects, 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, as discussed above, the Project would comply with applicable LAFD requirements and, similar to the Project, the related projects and other future development projects in the Central City Community Plan area would be reviewed by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each related project and other future development projects in the Central City Community Plan area would be required to comply with regulatory requirements related to fire protection. In addition, the Project, related projects, and other future development projects in the Central City 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. Similar to the Project, the related projects and other future development projects in the Central City Community Plan area would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City.²⁷

Additionally, consistent with the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 2.d above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. However, if a new fire station, or the expansion, consolidation, or relocation of an existing station was determined to be warranted by LAFD, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or MND and would not be expected to result in

²⁷ *City of Los Angeles, Proposed Budget for the Fiscal Year 2022–23.*

significant impacts.²⁸ Therefore, development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

Based on the above, the Project's contribution to cumulative impacts to fire protection services would not be cumulatively considerable. As such, cumulative impacts on fire protection would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

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

²⁸ *Although an EIR was prepared for the construction of LAFD Fire Station No. 39, the EIR concluded there would be no significant impacts. See Notice of Determination for Van Nuys Fire Station 39.*