IV. Environmental Impact Analysis

J.1 Public Services—Fire Protection

1. Introduction

This section of the Draft EIR evaluates whether new or physically altered fire facilities would be required to provide fire protection services to the Project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the Project Site. The analysis uses the following metrics from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements,emergency access; and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based, in part, on: information available on the LAFD website; Inter-departmental correspondence from LAFD to the Department of City Planning (October 30, 2018), which is included in Appendix K of this Draft EIR; and the *Utility Infrastructure Technical Report: Water* (Water Utility Report), prepared for the Project by KPFF Consulting Engineers (August 29, 2022), which is included in Appendix O 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 Agency
- 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 North Community Plan
- Los Angeles Municipal Code
- Propositions F and Q
- Measure J
- Los Angeles Fire Department Strategic Plan 2018–2020

(1) Federal

(a) Occupational Safety and Health Administration

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

(b) Federal Emergency Management 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 (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 Los Angeles Municipal Code (LAMC) with local amendments, as discussed below.[2]

(b) California Fire Service and Rescue Emergency Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan).[3] The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All 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]

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

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

3 *Governor's Office of Emergency Services, Fire and Rescue Division, California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan, revised April 2019.*

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

(c) California Vehicle Code

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

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

(d) California Constitution Article XIII, Section 35

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

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

(e) California Governor's Office of Emergency Services

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

Table IV.J.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 9.18	Phase the development of new fire facilities with growth.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.

Source: City of Los Angeles, General Plan Framework Element, 2022.

emergency medical services, 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 services, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for

[6] *City of Los Angeles General Plan Framework Element, Chapter 9: Infrastructure and Public Services, 2001.*

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 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, as shown in Table IV.J.1-2 on page IV.J.1-9. In addition, the City's Safety Element designates disaster routes. The nearest designated freeway disaster routes to the Project Site include the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all accessible within less than one mile of the Project Site. Santa Fe Avenue and Alameda Street, located approximately 0.1-mile and 0.6-mile from the Project Site, respectively, are the closest designated surface street disaster routes to the Project Site.[8]

(d) Central City North 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.H, Land Use, of this Draft EIR, the Project Site is located in the Arts District area of Downtown Los Angeles, within the Central City North Community Plan area. The Central City North Community Plan, adopted on December 15, 2000, and amended on September 7, 2016, includes the following objectives and policies that are relevant to fire protection:

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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, 2001.*

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

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

Goal/ Objective/ Policy	Description
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.J.1-2 (Continued)
Relevant General Plan Safety Element Goals, Objectives, and Policies

Goal/ Objective/ Policy	Description
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, General Plan Safety Element, 2006.

- Objective 9-1: Ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City North.
- Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine impact on service demands.
- Policy 9-1.2: Encourage the Fire Department to locate fire services facilities in appropriate locations throughout the community in order to maintain safety.

(e) Los Angeles Municipal Code

The Los Angeles Fire Code (LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code, and the International Fire Code. The City's Fire Code sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials. Specific regulations regarding fire prevention and protection are discussed below

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.

Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: LAFD communication systems, building communication systems, automatic elevators,

heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

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 57.4704.5.1 of the LAMC requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

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

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.

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 (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.

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, and 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.

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.[9] Also, as reported in November 2019, BOE completed the original Proposition F program projects under budget and funded two

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

additional fire stations with the remaining savings and interest.[10] Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[11]

(g) Measure J

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

(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.

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

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

b. Existing Conditions

(1) Fire Protection Services and Facilities

The LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services.[12] There are 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction.[13] At any given time, a total of 1,018 uniformed firefighters are on duty at fire department facilities citywide.[14] In addition, the LAFD is supported by 381 technical and administrative personnel.[15]

As indicated previously, the Project Site is located within the Arts District area of Downtown Los Angeles. More specifically, the Project Site includes approximately 1.70 acres located at 2136–2148 and 2159 E. Bay Street, and 2145–2161 E. Sacramento Street within LAFD's Central Bureau. As shown in Figure IV.J.1-1 on page IV.J.1-15, there are three LAFD fire stations located within a 2-mile radius of the Project Site. The closest station to the Project Site is Fire Station No. 17, which is the designated "first in" station, located approximately 0.5 mile south of the Project Site at 1601 South Santa Fe Avenue.[16] As shown in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 17 consists of an assessment engine, paramedic rescue ambulance, foam tender, Haz-Mat tender, arson investigation unit, and a staff of eight.[17] Therefore, the Project Site is located within the required response distance from a fire station with an engine or truck company for a site of the Industrial and Commercial category per LAMC Table 57.507.3.3.

Secondary fire stations that serve the Project Site include Fire Station No. 9 located approximately 1.5 miles from the Project Site at 430 E. 7th Street, and Fire Station No. 25 located approximately 1.8 miles from the Project Site at 2927 Whittier Boulevard.[18] Fire Station No. 9 consists of two assessment engines, a basic life support (BLS) truck, two

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[12] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed January 3, 2022.*

[13] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed January 3, 2022.*

[14] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed January 3, 2022.*

[15] *LAFD, Our Mission, www.lafd.org/about/about-lafd/our-mission, accessed January 3, 2022.*

[16] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018. Included in Appendix K of this Draft EIR.*

[17] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018.*

[18] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018.*

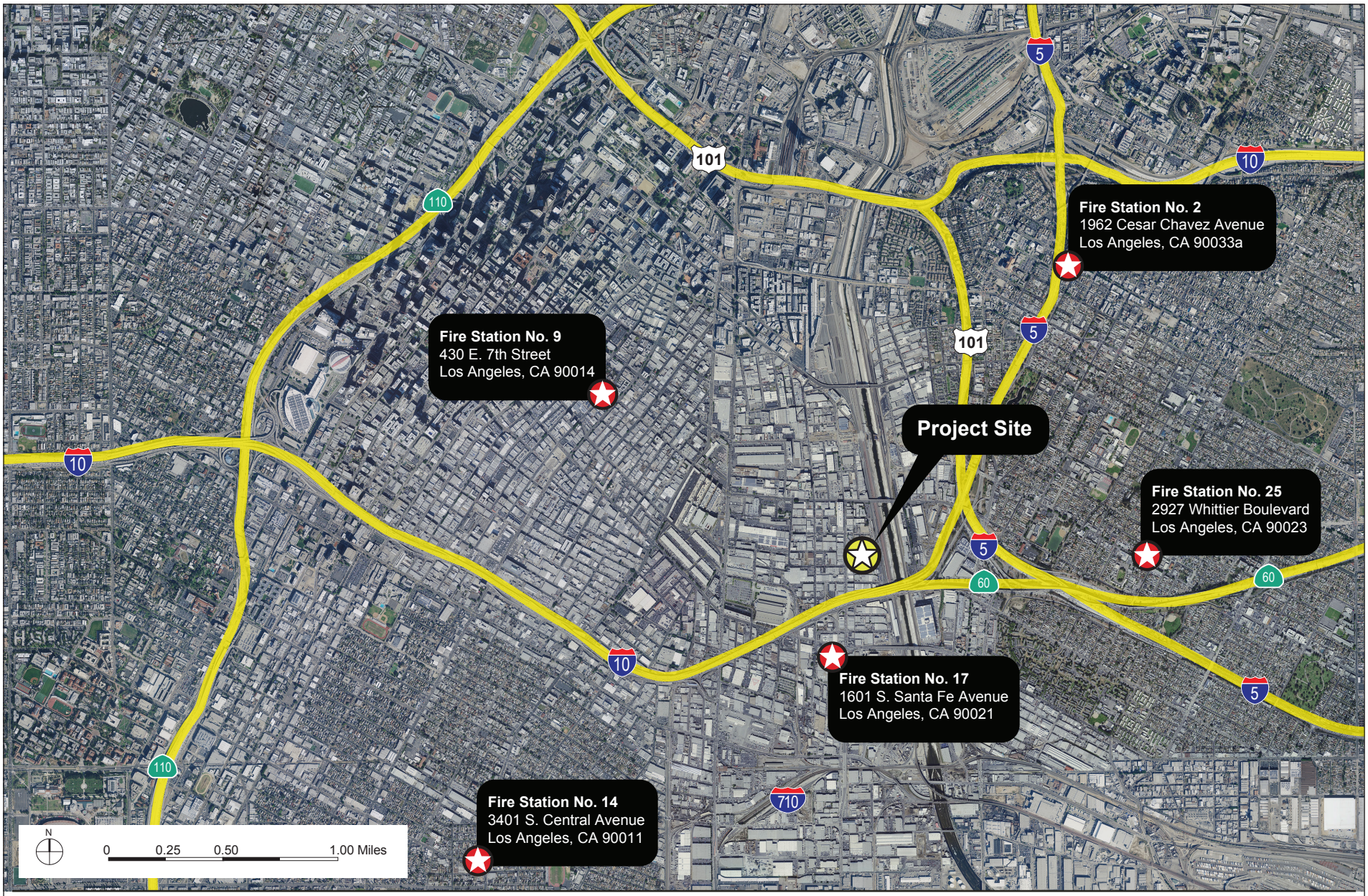

Figure IV.J.1-1
Fire Stations in the Vicinity of the Project Site

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

Table IV.J.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. 17 1601 S. Santa Fe Avenue Los Angeles, CA 90021	0.5 mile	• Assessment Engine • Paramedic Rescue Ambulance • Foam Tender • Haz-Mat Tender • Arson Investigation Unit	8
Fire Station No. 9 430 E. 7th Street Los Angeles, CA 90014	1.5 miles	• 2 Assessment Engines • BLS Truck • 2 Paramedic Rescue Ambulances • BLS Rescue Ambulance • Fast Response Unit	22
Fire Station No. 25 2927 Whittier Boulevard Los Angeles, CA 90023	1.8 miles	• Assessment Engine • Paramedic Rescue Ambulance	6
Fire Station No. 2 1962 Cesar Chavez Avenue Los Angeles, CA 90033	2.5 miles	• Light Force • Engine • Paramedic Rescue Ambulance	12
Fire Station No. 14 3401 S. Central Avenue Los Angeles, CA 90011	2.6 miles	• Assessment Engine • Paramedic Rescue Ambulance • BS Rescue Ambulance	8

Source: Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018. Included in Appendix K of this Draft EIR.

paramedic rescue ambulances, a BLS rescue ambulance, fast response unit, and a staff of 22. Fire Station No. 25 consists of an assessment engine, paramedic rescue ambulance, and a staff of six.[19]

The LAFD also identified two additional fire stations beyond a 2-mile radius of the Project Site that could serve the Project Site. These include Fire Station No. 2, located approximately 2.5 miles from the Project Site at 1962 Cesar Chavez Avenue, and Fire Station No. 14, located approximately 2.6 miles from the Project Site at 3401 S. Central Avenue. Fire Station No. 2 consists of a light force, engine, paramedic rescue ambulance,

[19] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018.*

and a staff of 12. Fire Station No. 14 consists of an assessment engine, paramedic rescue ambulance, BS rescue ambulance, and a staff of 8.[20]

The response times for January to December 2021, shown in Table IV.J.1-4 on page IV.J.1-18, 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 emergency medical services response and 5 minutes, 20 seconds for fire suppression response.[21] As indicated in Table IV.J.1-4, the average response times for LAFD Fire Station 17, the designated "first in" station for the Project Site, are: five minutes 37 seconds for structure fire calls; 6 minutes 10 seconds for critical advanced life support (ALS) calls; 7 minutes for emergency medical service (EMS) calls; and 6 minutes 31 seconds for non-EMS calls.

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.[22] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[23] Although response time can be considered to assess the adequacy of fire protection and emergency medical services, LAFD utilizes a variety of other criteria, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, 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 of Trustees 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.

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[20] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018.*

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

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

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

Table IV.J.1-4
Average Operational Fire Response Times (2021)

Station	Average Response Time to EMS (Minutes:Seconds)	Average Response Time to Non-EMS (Minutes:Seconds)	Average Response Time to Critical ALS (Minutes:Seconds)	Average Response Time to Structure Fire (Minutes:Seconds)
Fire Station No. 17	7:00	6:31	6:10	5:37
Fire Station No. 9	6:26	5:55	5:21	4:25
Fire Station No. 25	7:13	7:07	6:34	6:13
Fire Station No. 2	6:53	6:34	6:17	4:41
Fire Station No. 14	6:47	6:22	5:44	5:01
Citywide	6:55	6:33	5:58	5:09

ALS = advanced life support
EMS = emergency medical services
Response times are based on January–December 2021 data.
Source: LAFD, FireStatLA, www.lafd.org/fsla/stations-map?year=2021, accessed January 6, 2022.

The Project Site is currently developed with three buildings totaling 39,328 square feet of light industrial, office and creative floor area. The Project Site also contains shipping containers that have been converted into offices and conference rooms, tents used for welding operations and meetings, designated areas for storage of industrial byproducts, and surface parking. These existing on-site uses and associated estimated 108[24] employees currently generate a small (primarily daytime) service demand from the LAFD fire stations listed in Table IV.J.1-2 on page IV.J.1-9.

(2) Emergency Access

Regional emergency vehicular access to the Project Site is available from US-101, I-10 and I-5, all of which have on- and off-ramps less than a mile from the Project Site. Local emergency vehicular access to the Project Site is available from Bay Street and Sacramento Street, which border the Project Site to the north and south, respectively, and from other surface streets in the area that feed intro these streets (i.e., Santa Fe Avenue, Mateo Street, 7th Street, etc.). Emergency vehicular access into the Project Site is currently available from two driveways along Bay Street, while pedestrian emergency access into the Project Site is available from both Bay Street and Sacramento Street.

[24] *Based on the employee generation factors from the City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020. Specifically: 0.001 employees per square foot for the 16,222 square feet of existing light industrial floor area (16 employees); and 0.004 employees per square foot for the existing 23,106 square feet of office and creative office floor area (92 employees). 16 + 92 = 108.*

(3) Fire Water Infrastructure

As discussed in Section IV.M.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). Water service is currently provided to the Project Site via LADWP water lines within adjacent streets. According to the Water Utility Report, included in Appendix O of this Draft EIR, there is an 8-inch water main in Bay Street and an 8-inch water main in Sacramento Street.

(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.[25,26]

3. Project Impacts

a. Thresholds of Significance

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

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

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

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[25] *City of Los Angeles, Department of City Planning, ZIMAS, accessed January 3, 2022.*

[26] *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.*

- 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's 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 was also conducted to determine the Project's effect on fire protection and emergency medical 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 this EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire protection and emergency medical services is determined by whether construction of new or expanded fire protection and emergency medical facilities would be needed. 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 Section 15301 or 15332 or a Mitigated Negative Declaration.

c. Project Design Features

No project design features are proposed with regard to fire protection. However, as discussed in Section IV.K, Transportation, of this Draft EIR, pursuant to Project Design Feature TR-PDF-1, the Project would implement a construction management plan that would include provisions for maintaining emergency access to the Project Site during construction.

d. Analysis of Project Impacts

Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (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 has developed safety and health provisions for implementation during construction, which are set forth in 29 Code of Federal Regulations, Part No. 1926, as discussed further above in Subsection 2.a(1)(a). In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.[27] Additionally, in accordance with the provisions of OSHA, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.[28] Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

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[27] *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/laws-regs/regulations/standardnumber/1926/1926SubpartF, accessed January 3, 2022.*

[28] *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/laws-regs/regulations/standardnumber/1926/1926SubpartF, accessed January 3, 2022.*

Project construction could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, as discussed in Section IV.K, Transportation, of this Draft EIR, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures or roadway/access improvements. As indicated in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the installation of new water infrastructure would be limited to on-site water infrastructure improvements and minor off-site work associated with connections to the public main; no upgrades to public water mains are anticipated to be required.

Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily impact emergency access. However, a construction management plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.K, Transportation, of this Draft EIR, to 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. Furthermore, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above, Project construction activities would not require a new fire station or the expansion of an existing facility in order to maintain service. Therefore, impacts to fire protection and emergency medical services during Project construction would be less than significant.

(b) Operation

(i) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 17, the “first-in” station for the Project Site, located approximately 0.5 mile south of the Project Site. As shown in Table IV.J.1-3 on page IV.J.1-16, Fire Station No. 17 is equipped with an assessment engine, paramedic rescue ambulance, foam tender, Haz-Mat tender, arson investigation unit, and a staff of eight. In addition, Fire Station No. 9, located 1.5 miles

northwest of the Project Site, is equipped with two assessment engines, a BLS truck, two paramedic rescue ambulances, a BLS rescue ambulance, a fast response unit, and a staff of 22. As such, the Project Site is located within the required 1.0-mile engine company and 1.5-mile truck company response distances and the LAFD considers fire protection to be adequate.[29] Furthermore, as shown in Table IV.J.1-3 on page IV.J.1-16, although located beyond the specified response distance requirements, Fire Station Nos. 25, 2, and 14 have been identified by the LAFD as capable of initial responses needed at the Project Site.[30]

As discussed previously, the Project Site is currently developed with three buildings that consist of light industrial, office, and creative office uses, which generate a low demand for LAFD fire protection and emergency medical services. To accommodate for the Project's proposed uses, all existing structures would be removed. The Project would include the development of a three-building creative office campus consisting of approximately 217,189 square feet of creative office space and 5,000 square feet of retail and restaurant space. The Project would increase the building area and daytime population of the Project Site compared to existing conditions. Specifically, the Project would generate a daytime employee population of approximately 889 persons.[31] When accounting for the existing uses to be removed, which currently generate an estimated 108 employees, the Project would result in a net mainly daytime service population of 781 persons. As such, the Project would be expected to increase the demand for LAFD fire protection and emergency medical services from LAFD fire stations serving the Project Site (i.e., Fire Stations Nos. 17, 9, 25, 2 and 14). However, the Project does not propose residential units which typically have a higher demand for fire protection and emergency medical services than office and retail/restaurant uses. In addition, the Project would not include any unique or especially hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site.

As discussed in Section II, Project Description, of the Draft EIR, the Project would reach a maximum height of 190.23 feet and is considered a high-rise structure. Thus, the Project is required by LAMC Section 57.4705.4 to provide an emergency helicopter landing

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[29] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018. Included in Appendix K of this Draft EIR.*

[30] *Written correspondence from Ralph M. Terrazas, Fire Chief, and Kristen Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety, Los Angeles Fire Department, October 30, 2018.*

[31] *Based on the employee generation factors from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Specifically: 0.004 employees per square foot for the proposed 217,189 square feet of creative office floor area (869 employees); and 0.004 employees per square foot for the proposed 5,000 square feet of retail/restaurant floor area (20 employees). Gross: 869 + 20 = 889. Net: 889 – 108 = 781.*

facility (EHLF), as described above in Subsection 2.a.(3)(e), or to implement one of two alternate options to an EHLF. The Project would comply with Option 2 of LAFD Requirement No. 10 and acquire approval from the Fire Marshal for this option. In compliance with Option 2, 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, among others. These regulatory compliance measures would reduce the need for fire protection and emergency medical services at the Project Site. In addition, the Project would 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., including as set forth in the written correspondence from the LAFD included in Appendix K 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, and which are required prior to the issuance of a building permit.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment resulting from the Project. As such, compliance with Fire Code requirements would minimize the potential for incidents requiring an emergency response by LAFD and therefore reduce the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In addition, in accordance with the fire protection-related goals, objectives, and polices set forth in the Framework Element, the Safety Element, and the Central City North Community Plan, as listed in the regulatory framework above, and as confirmed in the written correspondence from the LAFD, the City along with LAFD would continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Objective 9-1 of the Central City North Community Plan), and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element). Furthermore, as indicated previously, 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 Section 15301 or 15332 or a Mitigated Negative Declaration.

Given the above factors, procedures and policy directives, as well as LAFD's continued evaluation of existing fire facilities, Project impacts with regard to LAFD facilities and equipment, and the associated potential need for the construction of new facilities, would be less than significant.

(ii) Emergency Access

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site, including emergency vehicle access, would be provided from driveways located on Bay Street and Sacramento Street. Access to the ground level parking areas would be provided via an ingress/egress driveway along Bay Street and two ingress/egress driveways on Sacramento Street. The driveway on Bay Street and the western driveway on Sacramento Street would have two lanes and would provide access to surface parking. The eastern driveway on Sacramento Street would have three lanes and provide access to the subterranean parking levels. The Project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

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 the ability to avoid traffic by using sirens and flashing lights to clear a path of travel, pursuant to CVC Section 21806. As such, emergency access to the Project Site and surrounding uses would be maintained at all times, 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.[32] Furthermore, the Project's driveways 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 confirmed 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 Section 57.118 of the LAMC, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede

[32] *As indicated previously, the Project Site is not located along a City-designated disaster route. The nearest designated freeway disaster routes are the Hollywood Freeway (US-101), the Santa Monica Freeway (I-10), and the Golden State Freeway (I-5), which are all at least several blocks from the Project Site. Santa Fe Avenue and Alameda Street, located approximately 0.1-mile and 0.6-mile from the Project Site, respectively, are the closest designated surface street disaster routes.*

emergency vehicle access. **Overall, emergency access to the Project Site and surrounding area would be maintained, and impacts would be less than significant.**

(iii) Fire Flow

As described in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project 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 K of this Draft EIR, the required fire flow for the Project would be 6,000 to 9,000 gallons per minute with a minimum residual water pressure of 20 pounds per square inch, which translates to 1,500 gpm per hydrant. All hydrants must be spaced to provide adequate coverage of building exterior.

As discussed in the Water Utility Report, included as Appendix O of this Draft EIR, 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 water needs. As described in the Water Utility Report, there are currently six existing fire hydrants located near the Project Site. Based on the completed IFFAR (see Exhibit 2 of the Water Utility Report), the six existing public fire hydrants flowing simultaneously can deliver combined flows of 9,000 gallons per minute, which is within the required range of 6,000 gallons per minute to 9,000 gallons per minute. Therefore, based on the IFFAR, there is adequate fire flow available for the Project to comply with the fire flow requirements identified by LAFD in accordance with LAMC Section 57.507.3.1.

As set forth in LAMC Section 57.507.3.2, land uses considered under the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between hydrants, and 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. As described above, the six existing fire hydrants located near the Project Site provide sufficient fire flow. If later required by the LAFD during their fire/life safety plan review, the Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Project.

Furthermore, in accordance with LAMC Section 57.4705.4 and LAFD Regulation No. 10 Option 2, as discussed further above, the Project will incorporate a fire sprinkler suppression system to reduce or eliminate public hydrant demands, which will be subject to LAFD review and approval during the design and permitting phase of the Project. A Service

Advisory Report (SAR) was submitted to LADWP to determine if the existing public water infrastructure could meet the fire flow demands of the Project. Based on the approved SAR (Exhibit 1 of the Water Utility Report), the existing 8-inch main in Bay Street has a static pressure of 53 pounds per square inch and shows that a flow of up to 1,400 gpm can be delivered to the Project Site with a residual pressure of 37 pounds per square inch, which exceeds the 20 pounds per square inch requirement for the surrounding public hydrants. As shown by the SAR, existing infrastructure from Bay Street is able to meet the fire flow demands of the Project.

Therefore, the Project's impacts with respect to fire flow would be less than significant.

(iv) Conclusion

Based on the analysis above, Project operation would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. In addition, as concluded in the written correspondence from the LAFD included in Appendix K 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, potential impacts to fire protection and emergency medical services would be addressed. **Therefore, operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection and emergency medical services. As such, Project impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to fire protection and emergency medical services 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. 17, 9, 25, 2, and 14. 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 and emergency medical services, thus potentially resulting in cumulative impacts on fire protection and emergency medical services. Cumulative growth in the greater Project area through 2025 includes 72 known development projects, growth that may be projected as a result of the land use designation and policy changes contained in the combined update to the Central City and Central City North Community Plans known as the DTLA 2040 Plan (or the Downtown Community Plan Update),[33] 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 72 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. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 72 are fully built out by 2025, unless otherwise noted.

(a) Construction

Like the Project, each related project would 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. However, similar to the Project, 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. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance

[33] *Regarding the DTLA 2040 Plan: (1) an EIR was prepared for it; (2) the City Planning Commission recommended approval of it on September 23, 2021; (3) the City Council has yet to adopt it; and (4) it is subject to change. According to the DTLA 2040 projections on the DTLA 2040 webpage (accessed September 15, 2021), an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.*

with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials.

Should Project construction occur concurrently with one or more of the related projects located in close proximity to the Project Site, specific coordination among these multiple construction sites would be implemented as required by the Construction Traffic Management Plans for the Project and the related projects, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, as parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by LADOT, would be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures. As such, the Project would not have significant impacts on access and safety. Similar to the Project, each related project would implement design features during construction and would be subject to the City's routine construction permitting process, which includes a review by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and the related projects would not significantly impact LAFD response times within the Project Site vicinity as drivers of fire and emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Finally, the Project in and of itself would not cause a significant impact to fire protection and emergency medical services during construction.

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

(b) Operation

A number of the identified related projects and ambient growth projections fall within the service areas of Fire Station Nos. 17, 9, 25, 2, and 14. The increase in development and service populations from the Project, related projects, as well as other future development in the Central City North Community Plan area would result in a cumulative increase in the demand for LAFD services and could have a cumulative impact on fire services 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 Central City North 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 North Community Plan area would be required to comply with regulatory requirements related to fire protection and emergency medical services. In addition, the

Project, related projects, and other future development projects in the Central City North 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. As with the Project, the related projects and other future development projects in the Central City North 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.[34] Cumulative increases in demand for fire protection and emergency medical services due to related projects and other future development projects in the Central City North Community Plan area would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly.

Furthermore, over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

Additionally, consistent with *City of Hayward v. Board of Trustees of California State* University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) discussed in Subsection 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any new station construction in the area impacted by this Project either because

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

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 a Mitigated Negative Declaration.[35] 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 fire protection and emergency medical services impacts during operation would not be cumulatively considerable. As such, cumulative fire protection and emergency medical services impacts during operation would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts with regard to fire protection and emergency medical services would be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

[35] *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.*