IV. ENVIRONMENTAL IMPACT ANALYSIS
F. PUBLIC SERVICES
1. FIRE PROTECTION

1. INTRODUCTION

This section analyzes the proposed project’s impacts relative to the fire protection and emergency medical services provided by the City of Los Angeles Fire Department (LAFD). The analysis addresses fire protection facilities, services, and response times, emergency access, and fire-flow. The analysis is based, in part, on information provided by the LAFD Planning Section and the LAFD Hydrant and Access Unit. Information regarding fire flow capabilities is based on a Fire Service Pressure Flow Report from LADWP, dated May 8, 2009.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

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

In accordance with the Los Angeles Charter Section 520, fire prevention, fire suppression, and life safety services within the City of Los Angeles are provided by the LAFD. The LAFD is a full-spectrum life safety agency that provides fire protection and emergency medical services to a population of approximately 4 million people throughout the City of Los Angeles. The LAFD’s 3,586 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. At any given time, there are a total of 1,104 uniformed firefighters, including 242 paramedics, on-duty at 106 fire stations across the LAFD’s 471 square mile jurisdiction.1

As shown in Figure IV.F-1 on page IV.F-2, there are three LAFD fire stations located in the vicinity of the project site. The location, distance from the project site, response time to the site, staffing, and equipment of each of these fire stations are summarized in Table IV.F-1 on page IV.F-3. As shown in Table IV.F-1, Fire Station No. 26 at 2009 South Western Avenue in Los Angeles is located closest to the project site. At a distance of approximately 1.3 street miles

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1 Captain William N. Wells, Los Angeles Fire Department, Planning Section, Letter Correspondence dated February 17, 2009.
Figure IV.F-1
Fire Stations Located in the Vicinity of the Project Site

Source: PCR Services Corporation, 2009; Thomas Brothers, Inc. 2008.
and a response time of approximately 5.0 minutes, Fire Station No. 26 would likely be the first to respond to the project site in the event of an emergency and would thus be designated the “first-in” station. The “first-in” districts are determined by the response time and distance between the site and the City’s fire station. “First-in” district boundaries are generally located at halfway points between two stations.2 “First-in” districts are also based on the land use contained within the district, since the demand for services and response times can vary depending on population density, traffic, building types, and uses. The “first-in” district served by Fire Station No. 26 includes the West Adams area.

“Second call” stations are fire stations located in adjacent districts that support the “first-in” station. As shown in Table IV.F-1 Fire Station Nos. 68 and 29 would be designated as “second call” stations to support Fire Station No. 26 in the event of an emergency at the project site. Fire Station No. 68 is located at 5023 West Washington Boulevard, approximately 1.4 street miles from the project site with a response time of approximately 5.2 minutes, while Fire Station No. 29 is located at 4029 West Wilshire Boulevard, approximately 2.1 street miles from the project site with a response time of approximately 6.6 minutes.

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2 The midway points are determined according to response times to specific “Z” points (points placed 500 feet apart on a grid).
Table IV.F-2 on page IV.F-5 provides a listing of the daily average and 2008 total emergency medical service (EMS) and fire incidents for each of the three fire stations located near the project site. Emergency medical service is divided into two separate categories: basic life support and advance life support. Basic life support includes a truck, an ambulance, and services of an emergency response technician, but does not require the use of paramedics. Advance life support includes a truck, an ambulance, and a qualified (rated) paramedic. The paramedic rating is based on advanced technical training and hours of experience. Fire incidents refer to fire calls, including building fires; smoke; traffic accidents not requiring emergency medical service; trash and vehicle fires; and responses to fire alarms, elevator rescues, and similar emergencies. As indicated in Table IV.F-2, the average number of total daily incidents (emergency medical service and fire incidents) for Fire Station Nos. 26, 68, and 29 are 15.0, 15.3, and 12.0 incidents, respectively. Table IV.F-2 also lists the average response times to these incidents for each fire station. As shown, average response times were approximately 5.6 minutes at all three stations.

(2) Emergency Access

Emergency access to the project site is currently provided via the surrounding street roadways on Washington Boulevard, 21st Street, and 10th Avenue. Within the area, Western Avenue, Washington Boulevard, and the I-10 Freeway are designated disaster routes in the Safety Element of the City’s General Plan Framework.3

(3) Fire-Flow

Water for fire purposes is supplied to the project site via an existing City of Los Angeles Department of Water and Power (LADWP) 4D fire hydrant located at the northeastern corner of the project site, south of Washington Boulevard, and approximately 200 feet west of 10th Avenue.4 Fire-flow to the project site is approximately 5,000 gpm at 70 psi from this fire hydrant.5

b. Regulatory Environment

(1) State of California

The California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is a compilation of building standards, including fire safety standards for residential and commercial buildings. 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, not covered by the national model code. Typical fire safety requirements of the CBC include the installation of 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 in wildfire hazard areas. The CBC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific CBC regulations have been incorporated by reference in the Los Angeles Building Code Fire Safety Regulations. Chapter 7 of the CBC is incorporated by reference in Chapter 9 (Section 91.700) of the Los Angeles Municipal Code (LAMC) regarding the use of

Table IV.F-2

2008 Emergency Incident Data

<table>
<thead>
<tr>
<th>Fire Station</th>
<th>Number of Emergency Incidents</th>
<th>2008 Total</th>
<th>Average Response Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Station No. 26</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basic Life Support EMS</td>
<td>5.1</td>
<td>1,864</td>
<td>-</td>
</tr>
<tr>
<td>Advance Life Support EMS</td>
<td>8.5</td>
<td>3,092</td>
<td>-</td>
</tr>
<tr>
<td>Fire Incidents</td>
<td>1.4</td>
<td>528</td>
<td>-</td>
</tr>
<tr>
<td>Total Station Incidents</td>
<td>15.0</td>
<td>5,484</td>
<td>5.6</td>
</tr>
<tr>
<td>Fire Station No. 68</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basic Life Support EMS</td>
<td>5.1</td>
<td>1,872</td>
<td>-</td>
</tr>
<tr>
<td>Advance Life Support EMS</td>
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<td>3,188</td>
<td>-</td>
</tr>
<tr>
<td>Fire Incidents</td>
<td>1.5</td>
<td>540</td>
<td>-</td>
</tr>
<tr>
<td>Total Station Incidents</td>
<td>15.3</td>
<td>5,600</td>
<td>5.6</td>
</tr>
<tr>
<td>Fire Station No. 29</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basic Life Support EMS</td>
<td>4.3</td>
<td>1,564</td>
<td>-</td>
</tr>
<tr>
<td>Advance Life Support EMS</td>
<td>5.5</td>
<td>2,008</td>
<td>-</td>
</tr>
<tr>
<td>Fire Incidents</td>
<td>2.2</td>
<td>808</td>
<td>-</td>
</tr>
<tr>
<td>Total Station Incidents</td>
<td>12.0</td>
<td>4,380</td>
<td>5.6</td>
</tr>
</tbody>
</table>

\(^a\) Daily average obtained by dividing the 2008 total by 365 days.

Source: Captain William N. Wells, Los Angeles Fire Department, Planning Section, Letter Correspondence dated February 17, 2009.
fire-resistant building materials, fire suppression systems, and other fire safety elements related to the design and construction of high-rise buildings. Chapter 9, Section 905 of the CBC is incorporated by reference in Chapter 9 (Section 91.900) of the LAMC regarding fire protection systems.

(2) City of Los Angeles

(a) Los Angeles General Plan Framework

The Infrastructure and Public Services Chapter of the Citywide General Plan Framework sets goals, objectives, and policies for fire protection and emergency medical services in the City of Los Angeles. Objectives and policies have been established in accordance with Goal 9J of the Infrastructure and Public Services Chapter, which is to ensure that every neighborhood has the necessary level of fire protection service, emergency medical service, and infrastructure. Under the General Plan Framework, the City standard for both fire protection and emergency medical service response distance is 1.5 miles.\(^6\)

(b) General Plan Safety Element

The General Plan Safety Element, adopted on November 26, 1996, replaces the 1975 General Plan Safety Element and the 1979 Fire Protection and Prevention Element. It contains policies related to the City’s response to hazards and natural disasters. Policy 2.1.6 requires the LAFD to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate effective fire suppression including peak load water flow and building and fire code regulations. In addition, the LAFD is required to revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities, based on flow, intensity, and type of land use, life hazards, occupancy, and degree of hazards, to provide adequate fire and emergency medical service response.

(c) Los Angeles Municipal Code and Charter

As detailed in the Fire Protection and Prevention Chapter of LAMC Article 7 (Fire Code), the LAFD Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The Fire Code also provides regulations for the prevention of fires, the investigation of fires or life safety hazards, the elimination of fire and life safety hazards in any building or structure including buildings under

\(^6\) City of Los Angeles General Plan Framework, page 9-5.
construction, the maintenance of fire protection equipment and systems, and the regulation of the storage, use, and handling of hazardous materials.\footnote{City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02, Amended in Entirety, Ordinance Number 162,123, effective May 12, 1987.}

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

Division 118 of the Fire Code requires that all new high-rise buildings greater than 75 feet in height include a fire control station containing a public address system and telephones for LAFD use. The fire control station must contain a fire detection and fire alarm system, an elevator recall switch and status panel for all elevator cars, a sprinkler control system, standby power and emergency electrical power controls, controls for unlocking stairshaft doors, smoke evacuation and fan controls, stairway pressurization control switches, and status indicators for fire pumps and water supply. A sound-powered telephone communication system must be located at every floor level in each enclosed exit stairway, at every exterior location where an enclosed stairway exits to a public way, on the roof, and in every elevator car. In addition, a high-rise building must have at least one emergency and fire control elevator in each bank of elevators (Section 57.118.05), a dependable method of sounding a fire alarm throughout the building (Section 57.118.06), an emergency smoke control system (Section 57.118.07), a standby and emergency power system (Section 57.118.08), stairshaft doors for fire department use (Section 57.118.09), pressurized stairshafts (Section 57.118.10), and other devices operable from the fire control station, as previously listed. Division 118 also requires the installation of automatic sprinkler systems in all new high-rise buildings in addition to a rooftop emergency helicopter landing facility on each building in a location approved by the Chief of the LAFD.

Division 119 of the Fire Code requires an annual inspection of high-rise buildings including an evaluation of physical access, property condition, and all fire-safety facilities and equipment required under the LAMC Fire and Building Codes. Automatic fire extinguishing systems are inspected every six months by the LAFD. Annual fire safety inspections include fire warning systems, central station signaling systems, smoke management systems, elevators, emergency generator and lighting systems, fire doors, fire pumps, pressure reducing valves, and fire escapes. Under LAMC Chapter 9, Section 91.905.15, all smoke control systems shall be tested prior to the issuance of a Certificate of Occupancy and, after occupancy of the building, all operating parts of the smoke-control systems shall be retested every six months in accordance with the retest requirements established by the Department of Building and Safety and the LAFD.
The LAFD Bureau of Fire Prevention and Public Safety also administers guidelines for the sequence of operations for life safety systems in high-rise buildings. These guidelines address the management of life safety systems and facilities, including a sequence of procedures involving monitoring and management of audible and visual alarm signals; elevator lobby smoke detectors; duct smoke detectors; elevator shaft smoke/heat detectors; sprinkler valve flow switches; and smoke/fire dampers on each floor. Stairway numbering on each floor, roof access, and fire safety signage on all floors in prescribed locations are also required.

Division 9 of the Fire Code addresses access, hydrants, and fire-flow requirements. Under Division 9 (Section 57.09.03), an approved posted fire lane is to be provided for any portion of an exterior wall more than 150 feet from the edge of a roadway. Division 9 (Section 57.09.06) establishes fire-flow standards. Fire-flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. The determination of fire-flow adequacy is based on the type of land use with high-density land uses requiring higher flows from a greater number of hydrants. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system in addition to the required gpm water flow.

Division 9 (Section 57.09.06) limits the maximum response distance between a high-density residential development and a fire station to 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. The Chief of the LAFD may also require the provision of additional fire protection. Fire hydrant spacing and hydrant type is also determined according to land use. For high-density residential and neighborhood commercial uses, one hydrant per 100,000 square feet of land is required with a 300 to 450 feet distance between hydrants. Furthermore, every first story of a residential unit must be within 300 feet of an approved hydrant. Division 9 (Section 57.09.08) also provides for supplemental fire protection in which equipment and systems not otherwise required in the LAMC may be required by the LAFD. For sites with secured openings, Division 9 (Section 57.09.09) gives the Chief of the LAFD the authority to order the property owner to install an access box in an approved location that is accessible to the LAFD.

(d) City of Los Angeles Fire Facilities Bond

The City of Los Angeles Fire Facilities Bond (Proposition F) was approved by voters in November 2000. This original bond allocated $378.6 million of general allocation funds to build 18 new or replacement neighborhood fire/paramedic stations, one new satellite station (San Pedro Fire Station No. 36), and to expand and replace the emergency air operations and helicopter maintenance facility at the Van Nuys Airport (Fire Station No. 114), for a total of 20 Proposition F projects.
To date, 20 Proposition F and two additional non-Proposition F projects have been identified by the LAFD. Eighteen of the 20 Proposition F fire stations are currently operational, including Fire Station No. 4 (Civic Center), No. 89 (North Hollywood), No. 77 (Sun Valley), No. 83 (Encino), No. 5 (Westchester/LAX), No. 65 (Watts), No. 59 (Sawtelle/West Los Angeles), No. 114 (Van Nuys Airport), No. 81 (Panorama City/North Van Nuys), No. 62 (Mar Vista), No. 84 (Warner Center/Woodland Hills), No. 36 (San Pedro), No. 43 (Palms), No. 87 (Granada Hills), No. 13 (Korea Town), No. 78 (Studio City/Valley Village), No. 21 (South Los Angeles), and No. 64 (South Los Angeles).\(^8\) Fire Station No. 94 (Baldwin Hills/Crenshaw) is near the end of construction and is anticipated to be complete in December 2009. Fire Station No. 82 (Hollywood) is currently in the bid and award stage. The two non-Proposition F projects, which include Fire Station No. 31 (Sylmar) and No. 67 (Playa Vista) are also operational.

In addition, in March 2002, Proposition Q, the Citywide Public Safety Bond Measure, was passed for $600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities.\(^9\) Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, one new police station & jail, two bomb squad facilities, one Metro Detention Center, one new Emergency Operations/Dispatch Center, one Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities.

Measure J, which was approved by voters at the November 7, 2006 County State General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Currently under Proposition F, the construction of 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 two acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Measure J allows new regional fire stations funded by Proposition F located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.\(^10\)

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3. ENVIRONMENTAL IMPACTS

a. Methodology

Fire service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the proposed project. Changes in these factors resulting from the proposed project may increase the demand for services. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis to review a project’s emergency features and to determine if a proposed project would require additional equipment, personnel, or facilities. Beyond the standards included in the Los Angeles Fire Code, consideration is given to the size of a project, uses proposed, fire-flow necessary to accommodate the project, response time (an acceptable response time is generally 5 minutes) and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and the project’s potential to use or store hazardous materials.

b. Thresholds of Significance

(1) Appendix G to the State CEQA Guidelines

In accordance with Appendix G to the State CEQA Guidelines, a project could have a significant impact on the environment with regard to fire protection if a project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the fire department.

(2) City of Los Angeles’ 2006 CEQA Thresholds Guide

The City of L.A. CEQA Thresholds Guide (2006) provides specific guidance for measuring a project's actual impacts. The following factors are set forth in the City of L.A. CEQA Thresholds Guide (2006) for determining on a case-by-case basis whether the proposed project would have a significant impact:

- The proposed land use;
- Fire-related needs (e.g., use of hazardous materials);

• Whether the project site meets the recommended response time and distance requirements; and

• Project design features that would reduce or increase the demand for fire protection services.

Based on these factors, according to the City of L.A. CEQA Thresholds Guide (2006), a significant impact to fire protection services would occur if the proposed project would:

• Require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

c. Project Design Features

The proposed project would comply with all applicable State and local codes and ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the City of Los Angeles General Plan. The proposed project would also comply with the City of Los Angeles Department of Public Works Standard Plan S-470-0 regarding the standard street dimensions related to private development, and all applicable high-rise construction requirements set forth in the LAMC, including Chapter 9 (Building Code) and Chapter 5, Article 7 (Fire Code). In regard to Division 7 of the Building Code, the proposed project would comply with all fire safety requirements related to provisions of fire-resistant building materials and smoke control.

Consistent with the requirements of the Fire Code, including Division 118, the project would provide one emergency and fire control elevator in each bank of elevators, an emergency smoke control system, a standby and emergency power system, and a dependable alarm system. The building design would include stairshaft doors for fire department use and pressurized stairshafts. In compliance with Division 118 (Section 57.118.11) and LAFD Standard No. 59, the project would also include an automatic sprinkler system throughout the residential and subterranean garage areas. To comply with Fire Code requirements, smoke detectors would also be maintained in all residential units and public areas. Additionally, in compliance with Fire Code Division 33 (Section 57.33.17) stairways would be numbered on each floor, and fire safety signage on all floors would be placed in required locations. In case of fire emergencies, access to the roof would also be available.

The proposed project consists of two options, Option A and Option B. Option A proposes three buildings ranging in height from 68 to 205 feet, while Option B proposes three buildings ranging in height from 50 to 85 feet. Thus buildings under both development options would exceed the 75-foot threshold set by Fire Code Division 118, requiring that the project
include safety measures described in Division 118. In accordance with Fire Code Division 118 (Section 57.118.12) and in compliance with guidelines of LAFD Standard No. 54, a rooftop emergency helicopter landing facility or heliport would be provided for the high rise buildings, in a location approved by the Fire Chief.

The proposed project would provide emergency vehicle access to the project site. The Applicant has been coordinating with LAFD during the development of the project design plans to ensure that emergency vehicles and equipment would have adequate access to the project site in case of an emergency. Emergency access to the site would be available on Washington Boulevard and 10th Avenue. For Option A, emergency access would be available through two driveways on Washington Boulevard and two driveways on 10th Avenue. The two driveways on Washington Boulevard would be located at the western end of the site and in the center of the site. The westernmost driveway on Washington Boulevard would be located across from 12th Avenue. The other two driveways on 10th Avenue would be located in the southern portion of the site. Option B would provide emergency access on Washington Boulevard and on 10th Avenue via three driveways. One driveway would be provided on Washington Boulevard at the western edge of the site and would be located across from 12th Avenue. The two driveways would be provided on 10th Avenue in the southern portion of the site. The two driveways on 10th Avenue would intersect the north-south driveway on the western portion of the site.

d. Analysis of Project Impacts

(1) Construction

Option A and Option B

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, project construction would comply with applicable existing codes and ordinances. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Construction-related traffic on adjacent streets could potentially affect emergency access to the project site and neighboring uses. However, construction staging and all temporary
facilities (temporary offices, trash bins, toilets, cranes, pumps, etc) would occur on-site. As such, construction is anticipated to only require the closure of the sidewalks and parking lanes (no traffic lane closures) on Washington Boulevard and 10th Avenue. Nonetheless, construction activities could increase response times for emergency vehicles to local businesses and/or residences on Washington Boulevard to Crenshaw Boulevard, due to travel time delays to through traffic. As discussed above, Washington Boulevard, and the I-10 freeway are designated disaster routes by the City. Therefore, throughout the duration of construction, traffic management personnel (flag persons) and appropriate detour signage would be employed as necessary to ensure emergency access is maintained to the project site and that traffic flow is maintained on street right-of-ways. The project contractor would coordinate with the City to obtain an approved traffic control plan to accommodate the flow of vehicular and pedestrian traffic in the area. Additionally, as discussed in Section IV.G, Transportation and Circulation, the proposed project would require implementation of a Construction Staging and Traffic Management Plan per LAMC requirements. As discussed in Section IV.G, the Construction Staging and Traffic Management Plan would include breaks during peak traffic periods at the adjacent high school to alleviate congestion during these periods. For a detailed discussion of construction-related traffic, please refer to Section IV.G of this Draft EIR. Upon implementation of this plan and the recommended mitigation measures described in Section IV.G of this EIR, traffic impacts from construction activity would be reduced to a less than significant level. Therefore, construction-related traffic impacts to emergency access would be less than significant.

(2) Operation

(a) Option A

Fire Protection Facilities, Services, and Response Times

As previously discussed, Fire Station No. 26 is located closest to the project site and would be the “first-in” station to respond to an emergency. Fire Station No. 26 is equipped with a Truck and Engine Company, Fire Engine, Paramedic Rescue Ambulance, and Basic Life Support Rescue Ambulance, and is staffed with 14 personnel on a 24-hour basis. Six personnel are assigned to the Truck and Engine Company, four personnel to the Fire Engine, two personnel to the Paramedic Rescue Ambulance, and two personnel to the Basic Life Support Rescue Ambulance. As shown in Table IV.F-2, Fire Station No. 26 reported 5,484 incidents in 2008. Based on City of Los Angeles Planning Department 2007 population data, the population served by Fire Station No. 26 in 2007 was approximately 80,754 persons.12 By dividing the number of

12 Note: 2008 Population data is currently unavailable; Service boundaries are measured as the halfway point between all of the adjacent fire stations. As such, Fire Station No. 26 service boundaries are loosely bounded by Olympic Boulevard and Pico Boulevard to the north, between Normandie Avenue and Vermont Avenue to the
annual incidents by the population of the “first-in” district served by Fire Station No. 26, a generation factor of 0.068 annual incidents per capita was derived.13

The 547 residential units in Option A would generate a total of approximately 1,526 new residents.14 Option A would also include approximately 82,539 square feet of retail uses and approximately 24,330 square feet of restaurant uses, which would result in daytime population to the project site and surrounding area in the form of employees and patrons. As no population conversion factors are available for the restaurant uses, police service population conversion factors for retail uses were utilized to estimate the number of patrons and employees that would be generated on-site. Based on a conversion factor of 3 persons per 1,000 square feet for retail uses provided in the City of Los Angeles CEQA Thresholds Guide (2006), the proposed 82,359 square feet of retail uses and proposed 24,330 square feet of restaurant uses under Option A would generate approximately 321 patrons and employees. When combined with the number of residents the project would generate, Option A would result in both a temporary and permanent population of 1,847 persons on-site. When compared with the existing population of the site (an approximate total of 310 patrons and employees), the project would result in a net increase of 1,537 persons on-site.15 Given this net increase and the generation factor of 0.068 incidents per capita discussed above, Option A could potentially generate a net increase of approximately 105 incidents per year. This net increase of 105 incidents per year would constitute a 1.9 percent increase in annual incidents under Option A.

Overall, a 1.9 percent increase in annual incidents under Option A, is relatively low, and would increase the demand on LAFD fire protection and emergency medical services nominally. Furthermore, the adequacy of fire protection and emergency medical service for a given area is based on the response distance from existing fire stations, required fire-flow, and the LAFD’s judgment for needs in the area. Fire Station No. 26 is located approximately 1.3 miles from the west, Jefferson Boulevard at the boundary’s most southern tip, and along Crenshaw Boulevard to the east. The census tracts located within Fire Station No. 26’s service boundaries include Census Tract 2131.00 (3,891 residents), Census Tract 2132.01 (4,249 residents), Census Tract 2132.02 (4,631 residents), Census Tract 2181.10 (3,557), Census Tract 2181.20 (4,826 residents), Census Tract 2187 4,487 residents), Census Tract 2188 (2,821 residents), Census Tract 2189 (2,962 residents), Census Tract 2212.10 (3,373 residents), Census Tract 2212.20 (3,861 residents), Census Tract 2213.01 (6,376 residents), Census Tract 2213.02 (4,690 residents), Census Tract 2214 4,575 residents), Census Tract 2215 (5,507 residents), Census Tract 2216 (5,271 residents), Census Tract 2220 (7,678 residents), Census Tract 2221 (3,945 residents), Census Tract 2222 (4,054 residents).

13 This methodology assumes that incidents are a function of people (i.e., the more people you have in an area, the more chances that an incident (fire or medical emergency) will occur.

14 The West Adams-Baldwin Hills-Leimert Community Plan estimates that in 2010, the population in the Community Plan Area would increase to 200,981 residents and the number of households would grow to 71,896, which would represent an average household size of 2.79 persons.

15 The number of existing employees and patrons on-site are based on the police conversion factors provided in the City of Los Angeles CEQA Thresholds Guide (2006) and the total square footage of development currently in existence.
project site and is within the recommended maximum response distance of 1.5 miles. The estimated response time to the project site is 5.0 minutes which is also within the desired response time of 5.0 minutes. Additionally, Fire Station No. 68 is located approximately 1.4 miles from the project site which is also within the recommended maximum response distance of 1.5 miles. Therefore, based on the number of incidents estimated for the proposed project together with the ability of other fire stations to provide support to Fire Station No. 26, construction of an additional station in closer proximity to the project site would not be required.

As the project would be located within a highly accessible area that is currently served by the LAFD, and the LAFD has indicated no deficiencies in staffing or facilities that would occur or be worsened by Option A, it is not expected that the relocation or construction of new LAFD facilities, or expansion of existing facilities would be required as a result of Option A’s minimal increase in yearly demand for fire services. Therefore, Option A would have a less than significant impact with respect to fire services. Nonetheless, Mitigation Measures F.1-1 and F.1-2 are recommended to help reduce the number of incidents and ensure impacts to fire protection and emergency medical services are less than significant.

**Emergency Access**

Project-related increase in traffic on surrounding roadways could have an impact on fire protection and emergency medical services if the response capabilities of the LAFD are impeded. As discussed in Section IV.G, Traffic and Circulation of this Draft EIR, the proposed project would not result in significant impacts to the surrounding intersections, with the incorporation of mitigation measures. The Applicant has coordinated with the LAFD to ensure site design provides adequate access for emergency vehicles and equipment to the project site, subject to the approval of the Fire Chief. Option A would provide four driveways, with two driveways on Washington Boulevard and two driveways on 10th Avenue. Therefore emergency vehicles would be able to access the site adequately from either Washington Boulevard or 10th Avenue. Furthermore, due to the proximity of Fire Station No. 26 (1.3 miles) and the two supporting fire stations to the site, as well as the number of major roadways serving the project site, emergency response to the project site is not anticipated to fall below the existing service level of 5.0 minutes by Fire Station No. 26. Therefore, Option A would have a less than significant impact on emergency access. Mitigation Measure F.1-3 is recommended to ensure impacts to emergency access are less than significant.

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16 Captain William N. Wells, Los Angeles Fire Department, Planning Section, Letter Correspondence dated February 17, 2009.
Fire-Flow

Fire-flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. As discussed above, existing fire-flow to the project site is approximately 5,000 gpm at 70 psi from the existing 10” fire hydrant located on the south side of Washington Boulevard, approximately 200 feet west of 10th Avenue.\(^1\) The project would also comply with additional off-site public and on-site private fire hydrants, as specified by Mitigation Measure F.1-4 that may be necessary to meet LAFD fire flow requirements. The number, sizes, and locations of such hydrants would be determined by the LAFD either prior to the recordation of the final map or the approval of a building permit. Additionally, if improvements to the water system and/or roadways are necessary, such improvements would be reviewed and approved to the satisfaction of the LAFD. The installation of any required improvements by LAFD would occur prior to issuance of a certificate of occupancy for the project. Thus, based on the above, the project would result in a less than significant impact relative to fire flow.

(b) Option B

Fire Protection Facilities, Services, and Response Times

The 342 residential units in Option B would generate a total of approximately 954 new residents. Option B would also include approximately 176,125 square feet of retail uses, 35,900 square feet of office uses, and 25,100 square feet of restaurant uses, which would result in daytime population to the project site and surrounding area in the form of employees and patrons. As discussed above, no population conversion factors are available for restaurant uses. Therefore, conversion factors for retail uses were utilized. Based on a conversion factor of 3 persons per 1,000 square feet for retail uses provided in the *City of Los Angeles CEQA Thresholds Guide (2006)*, the proposed 176,125 square feet of retail uses and proposed 25,100 square feet of restaurant uses under Option B would generate approximately 603 employees and patrons. When combined with the number of residents the project would generate, the project, under Option B would result in both a temporary and permanent population of 1,701 persons on-site. When compared with the existing population of the site (an approximate total of 310 patrons and employees), the project would result in a net increase of 1,391 persons on-site.\(^1\) Given this net increase and the generation factor of 0.068 incidents per capita discussed above, the project under Option B could potentially generate a net increase of

\(^1\) *Ibid (9).*

\(^1\) *The number of existing employees and patrons on-site are based on the police conversion factors provided in the City of Los Angeles CEQA Thresholds Guide (2006) and the total square footage of development currently in existence.*
approximately 95 incidents per year. This net increase of 95 incidents per year would constitute a 1.7 percent net increase in annual incidents under Option B.

Overall, the 1.7 percent net increase in annual incidents that would occur under Option B is relatively low and less incidents than Option A. Thus, similar to Option A, Option B would result in a nominal increase in demand on LAFD fire protection and emergency medical services. Fire Station Nos. 26 and 68 are located within the maximum response distance of 1.5 miles, resulting an in estimated response time of 5.0 minutes. Therefore, based on the number of incidents estimated for the proposed project along with the ability of other fire stations to provide support to Fire Station No. 26, construction of an additional station in closer proximity to the project site would not be required.

As the project would be located within a highly accessible area that is currently served by the LAFD, and the LAFD has indicated no deficiencies in staffing or facilities that would occur or be worsened by Option B, it is not expected that the relocation or construction of new LAFD facilities, or expansion of existing facilities would be required as a result of Option B’s minimal increase in yearly demand for fire services. Therefore, Option B would have a less than significant impact with respect to fire services. However, as with Option A above, Mitigation Measures F.1-1 and F.1-2 are recommended to help reduce the number of incidents and ensure impacts to fire protection and emergency medical services remain less than significant.

**Emergency Access**

Option B would provide one driveway on Washington Boulevard and two driveways on 10th Avenue, which would intersect along the western portion of the site. Adequate emergency access would be available to the site from either Washington Boulevard or 10th Avenue. Furthermore, as noted above, due to the proximity of Fire Station No. 26 (1.3 miles), the two supporting fire stations to the site, and the number of major roadways serving the project site, emergency response to the project site is not anticipated to fall below the existing service level of 5.0 minutes by Fire Station No. 26. Therefore, development of the project under Option B would have a less than significant impact on emergency access. However, Mitigation Measure F.1-3 is recommended to ensure impacts to emergency access are less than significant.

**Fire Flow**

As discussed above, existing fire-flow to the project site is approximately 5,000 gpm at 70 psi from the existing 10 inch fire hydrant located on the south side of Washington Boulevard, approximately 200 feet west of 10th Avenue.\(^\text{10}\)  Similar to Option A above, under Option B the

\(^{10}\) *Ibid* (9).
project would comply with LAFD fire flow requirements, as specified by Mitigation Measure F.1-4, including the number, sizes, and locations of hydrants subject to the approval by the LAFD, either prior to the recordation of the final map or the approval of a building permit. Additionally, if improvements to the water system and/or roadways are necessary, such improvements would be reviewed and approved to the satisfaction of the LAFD. The installation of any required improvements by LAFD would occur prior to issuance of a certificate of occupancy for the project. Thus, based on the above, the project would result in a less than significant impact relative to fire flow.

4. **MITIGATION MEASURES**

Implementation of the following mitigation measures would ensure that impacts related to fire protection remain less than significant.

**Mitigation Measure F.1-1:** Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features and other life-saving equipment (e.g., defibrillators) appropriate to the design of the project.

**Mitigation Measure F.1-2:** The project shall comply with all applicable State and local codes and ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the City of Los Angeles General Plan, unless otherwise approved.

**Mitigation Measure F.1-3:** Prior to the issuance of building permits, project building plans including a plot plan and floor plan of the buildings shall be submitted for approval by the Los Angeles Fire Department. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes, roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

**Mitigation Measure F.1-4:** The project shall comply with additional off-site public and on-site private fire hydrants in order to meet LAFD fire flow requirements, at the discretion of LAFD. The number, sizes, and locations of such hydrants would be determined by the LAFD either prior to the recordation of the final map or the approval of a building permit. The project shall install any required improvements by LAFD prior to issuance of a certificate of occupancy.
5. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 31 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on fire protection and emergency medical services, only those related projects located within Fire Station No. 26’s “first-in” district are considered. Of the 31 related projects identified in Section III, seven are located within Fire Station No. 26’s “first-in” district as listed in Table IV.F-3 on page IV.F-20. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional fire protection and emergency medical services. The related projects include various residential, commercial/retail, and office uses.

Similar to the proposed project, the number of annual incidents anticipated to be generated by related projects was estimated based on residential and non-residential increases in population. As shown in Table IV.F-3, the related projects located within Fire Station No. 26 “first-in” district could potentially increase residential and non-residential population by 306 persons thus generating an additional 20 incidents per year. Option A in conjunction with the related projects could generate a total of 125 incidents per year, which would result in an approximately 2.28 percent increase in annual incidents. Option B in conjunction with related projects could generate a total of 115 incidents per year, which would result in an approximately 2.1 percent increase in annual incidents.

Although a cumulative increase in LAFD fire protection services would occur, cumulative project impacts on fire protection and emergency medical services would be reduced through regulatory compliance, similar to the proposed project. All related projects would comply with the LAMC Fire Code and Building Code regulations related to fire safety, access, and fire-flow. Additionally, “second call” stations would help support Fire Station No. 26 in the event an emergency were to occur. It should also be noted that the project, as well as related projects would generate revenue to the City’s general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user’s tax, gross receipts tax, real estate transfer tax on residential initial sales and annual resales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund LAFD expenditures as necessary to offset cumulative impacts to LAFD fire protection facilities and services. Therefore, cumulative impacts on fire protection and emergency medical services would be less than significant.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

In compliance with the LAMC Fire Code, the adopted Los Angeles General Plan, the General Plan Safety Element, and all other applicable ordinances and requirements, the proposed project would not result in any significant impacts on fire protection and emergency medical
services. Implementation of the recommended mitigation measures would ensure that the project’s impacts on the delivery of fire protection and emergency medical services to the project site remain less than significant. Thus, no significant unavoidable impacts with regard to fire protection services are anticipated.

Table IV.F-3

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Project</th>
<th>Location</th>
<th>Residential and Non-Residential Population</th>
<th>Approximate No. of Annual Incidents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Coffee Shop</td>
<td>4177 W Washington Blvd</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>2</td>
<td>Private Elementary School</td>
<td>1932 10th Avenue</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>3</td>
<td>Elementary School</td>
<td>3rd Avenue and Washington Blvd</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>17</td>
<td>Shopping Center</td>
<td>1144 S. Western Ave</td>
<td>65</td>
<td>4</td>
</tr>
<tr>
<td>18</td>
<td>Solid Waste Facility</td>
<td>2201 W. Washington Blvd</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>20</td>
<td>Laundromat Expansion</td>
<td>2575 Normandie Ave</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>30</td>
<td>Condominium</td>
<td>3001 S. Western Ave</td>
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<td>16</td>
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<tr>
<td>Related Projects Total</td>
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<td>Proposed Project Option A Total</td>
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<tr>
<td>Proposed Project Option B Total</td>
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<td>Cumulative Total with Option A</td>
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<td>125</td>
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<tr>
<td>Cumulative Total with Option B</td>
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<td>1,697</td>
<td>115</td>
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</tbody>
</table>

Corresponds with Map Nos. on Figure III-1 in Section III of this Draft EIR.

For related projects with residential uses, the residential population was determined by multiplying the number of residential units by the average household size as indicated by the population data obtained for the census tract where each project is located.

For related projects with non-residential uses, the non-residential population was determined based on the following generation factors as indicated in the City of L.A. CEQA Thresholds Guide (2006): 4 persons per 1,000 square feet of office space and 3 persons per 1,000 square feet of retail space.

The residential and non-residential population was multiplied by the generation factor of 0.068 incidents per capita to estimate the number of incidents generated by related projects.

No population was calculated for school uses since the increase in population for such uses would generally be accounted for in new residential uses within the area and would result in double counting.

No population was calculated for the solid waste facility as the amount of tons of solid waste per day was provided.

No development information was provided for the Laundromat expansion project, thus approximate annual incidents was not calculated.