

## **IV. Environmental Impact Analysis**

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### **J.2 Public Services—Fire Protection**

#### **1. Introduction**

This section of the Draft EIR analyzes the Proposed Project's potential impacts on fire protection and emergency medical services provided by the Los Angeles Fire Department (LAFD). The analysis addresses the Proposed Project's impacts relative to service capacity, fire flow requirements, emergency response times, emergency access, and fire safety equipment. Information for this section was provided in part by the LAFD and is included in Appendix U of this Draft EIR.

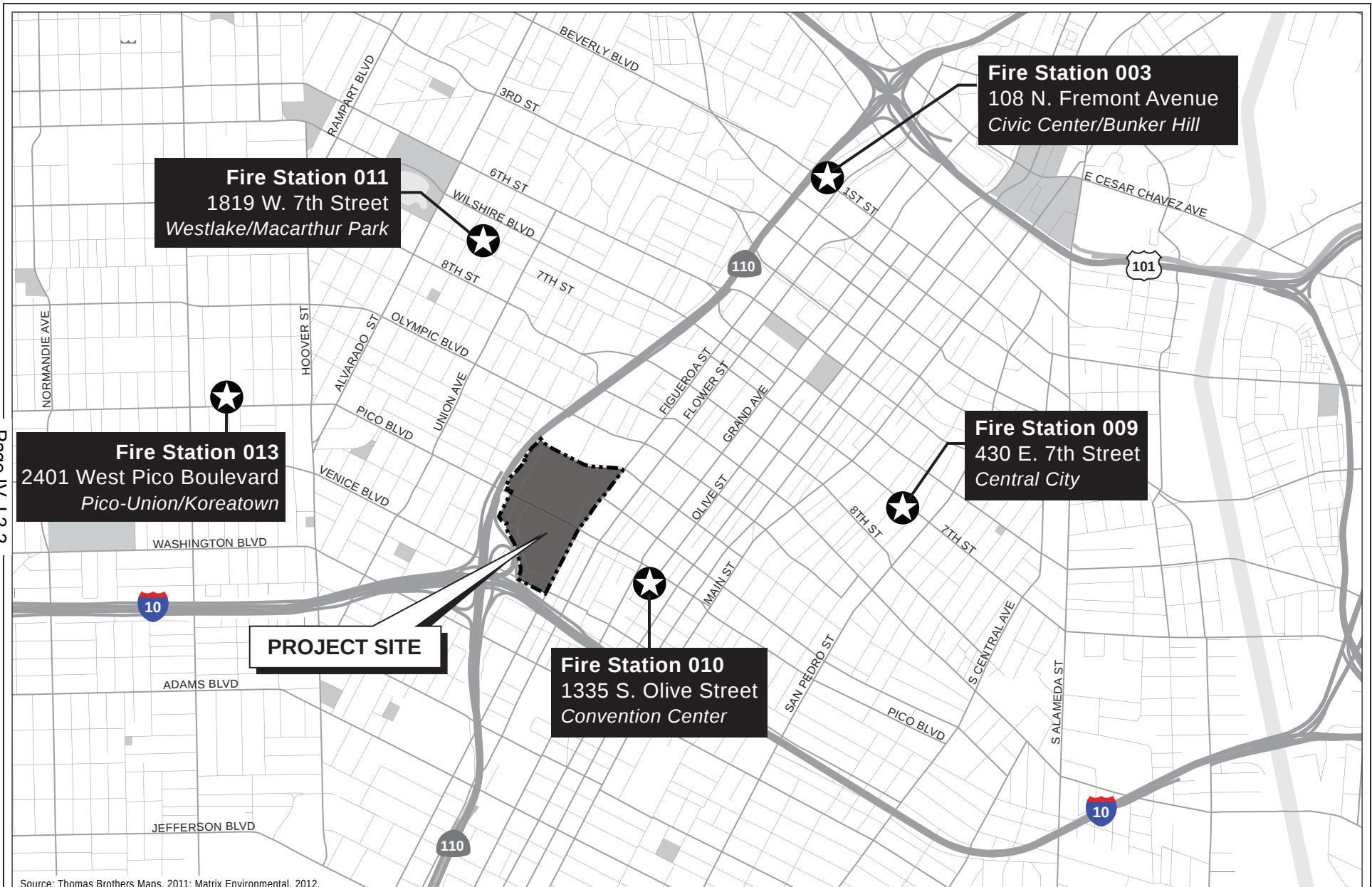
#### **2. Environmental Setting**

##### **a. Existing Conditions**

The LAFD serves as the City of Los Angeles' (City) full-spectrum life safety agency, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services to approximately 3.8 million people per the 2010 U.S. Census.

##### **(1) LAFD Fire Protection Facilities Serving the Project Site**

As shown in Figure IV.J.2-1 on page IV.J.2-2, there are five City fire stations located within 2 miles of the Project Site that would serve the Proposed Project. The closest Fire Station to the Project Site is Fire Station No. 10, located approximately 0.6 mile away at 1335 South Olive Street. As shown in Table IV.J.2-1 on page IV.J.2-3, Fire Station No. 10 houses 14 firefighters, including two basic life support emergency medical technicians and three fighter paramedics. Equipment at Fire Station No. 10 consists of one engine, one paramedic assessment light force truck, one paramedic ambulance, and one basic life support ambulance. As shown in Table IV.J.2-2 on page IV.J.2-4, 2011 average response times to emergency medical service (EMS) incidents within their first-in district for Fire Station No. 10 were 4 minutes 30 seconds. Fire Station No. 10 is currently operating beyond full capacity.



**Table IV.J.2-1  
Fire Stations Serving Project Site**

| <b>Station No., Location and Community Served</b>                                                                                                                                                                                                                                                                                                                                                       | <b>Equipment/Resources</b>                                                                                                                                                                                                                                                              | <b>Staffing</b>                                                                                                              | <b>Distance to Site<sup>b</sup></b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| Station No. 10<br>1335 S. Olive Street<br>Community Served:<br>Convention Center                                                                                                                                                                                                                                                                                                                        | 1 Engines<br>1 Paramedic<br>Assessment Light<br>Force Truck<br>1 Paramedic<br>Ambulance<br>1 Basic Life Support<br>Ambulance                                                                                                                                                            | 2 Captains<br>7 Engine or Truck Fighters<br>2 Basic Life Support<br>Emergency Medical<br>Technicians<br>3 Fighter Paramedics | 0.6 mile                            |
| Station No. 9<br>430 E. 7th Street<br>Community Served:<br>Central City                                                                                                                                                                                                                                                                                                                                 | 1 Engine<br>1 Truck<br>2 Paramedic<br>Ambulances<br>1 Basic Life Support<br>Ambulance                                                                                                                                                                                                   | 2 Captains<br>9 Engine and Truck<br>Firefighters<br>4 Fighter Paramedics                                                     | 1.2 miles                           |
| Station No. 3<br>108 N. Fremont Avenue<br>Community Served: Civic<br>Center/Bunker Hill                                                                                                                                                                                                                                                                                                                 | 1Engines<br>1 Light Force Truck<br>1 Paramedic<br>Ambulance<br>1 Basic Life Support<br>Ambulance<br>1 Emergency Light<br>Unit <sup>a</sup><br>1 Command Post<br>Vehicle <sup>a</sup><br>1 Medical Supply<br>Trailer <sup>a</sup><br>1 Urban Search and<br>Rescue Apparatus <sup>a</sup> | 2 Captains<br>8 Firefighters<br>2 Firefighter Paramedics<br>2 Basic Life Support<br>Emergency Medical<br>Technicians         | 1.4 miles                           |
| Station No. 11<br>1819 W. 7th Street<br>Community Served:<br>Westlake/Macarthur Park                                                                                                                                                                                                                                                                                                                    | 1 Engines<br>1 Paramedic<br>Assessment Light<br>Force Truck<br>1 Paramedic<br>Ambulance<br>1 Basic Life Support<br>Ambulance                                                                                                                                                            | 2 Captains<br>7 Firefighters<br>3 Firefighter Paramedics<br>2 Basic Life Support<br>Emergency Medical<br>Technicians         | 1.4 miles                           |
| Station No.13<br>2401 West Pico Boulevard<br>Community Served: Pico-<br>Union/Koreatown                                                                                                                                                                                                                                                                                                                 | 1 Engine<br>1 Paramedic<br>Ambulance<br>1 Battalion Chief's<br>Response Apparatus                                                                                                                                                                                                       | 1 Captain<br>1 Battalion Chief<br>2 Firefighter Paramedics<br>4 Firefighters                                                 | 1.8 miles                           |
| <sup>a</sup> Staffing included when needed.<br><sup>b</sup> Distances of the Fire Stations to the Project Site are based on data provided by LAFD.<br>Source: LAFD, Written Correspondence dated August 2011, and LAFD Website <a href="http://lafd.org/find-a-fire-station/399-station-list">http://lafd.org/find-a-fire-station/399-station-list</a> , accessed February 6, 2012. Updated March 2012. |                                                                                                                                                                                                                                                                                         |                                                                                                                              |                                     |

**Table IV.J.2-2  
Average Emergency Medical Service Response Times  
(July 2011–January 2012)**

| <b>Fire Station Number</b>                                                                                                                                                                                                                | <b>Average Response Time to EMS Incident Within Their First-In District<sup>a</sup><br/>(Minutes:Seconds)</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| 3                                                                                                                                                                                                                                         | 4:55                                                                                                          |
| 9                                                                                                                                                                                                                                         | 3:53                                                                                                          |
| 10                                                                                                                                                                                                                                        | 4:30                                                                                                          |
| 11                                                                                                                                                                                                                                        | 3:56                                                                                                          |
| 13                                                                                                                                                                                                                                        | 4:21                                                                                                          |
| <sup>a</sup> <i>This is the average response times for each of the fire station for responding to incidents within their own first-in district.</i><br><i>Source: LAFD, written correspondence dated August 2011. Updated March 2012.</i> |                                                                                                               |

The other four fire stations that would serve the Project Site, based on distance to the Project Site, include Fire Station Nos. 9, 3, 11, and 13. As shown in Figure IV.J.2-1 and Table IV.J.2-1, Station No. 9 is located approximately 1.2 miles from the Project Site. It houses 15 firefighters and includes 1 engine, 1 truck, 2 paramedic ambulances, and 1 basic life support ambulance. As shown in Table IV.J.2-2, above, average response times to emergency medical services incidents within their first-in district for Fire Station No. 9 in 2011 were 3 minutes 53 seconds. Fire Station No. 9 is currently operating at full capacity.

Station No. 3 is located approximately 1.4 miles from the Project Site. It houses 14 firefighters and includes 1 engine, 1 light force truck, 1 paramedic ambulance, and 1 basic life support ambulance. Station No. 3 also includes 1 emergency light unit, 1 command post vehicle, 1 medical supply trailer, and 1 urban search and rescue apparatus. As shown in Table IV.J.2-2, 2011 average response times to emergency medical services incidents within their first-in district for Fire Station No. 3 were 4 minutes 55 seconds. Fire Station No. 3 is currently operating at full capacity.

Station No. 11 is located approximately 1.4 miles from the Project Site. It houses 14 firefighters and includes 1 engine, 1 paramedic assessment light force truck, 1 paramedic ambulance, and 1 basic life support ambulance. As shown in Table IV.J.2-2 above, 2011 average response times to emergency medical services incidents within their

first-in district for Fire Station No. 11 were 3 minutes 56 seconds. Fire Station No. 11 is currently operating at full capacity.

Station No. 13 is located 1.8 miles from the Project Site. Station No. 13 houses 8 firefighters and includes 1 engine, 1 paramedic ambulance, and 1 Battalion Chief's response apparatus. As shown in Table IV.J.2-2, 2011 average response times to emergency medical services incidents within their first-in district for Fire Station No. 13 were 4 minutes 21 seconds. Fire Station No. 13 is currently operating at full capacity.

The closest existing emergency helicopter landing site to the Project Site is located at the top of the parking structure located at the northwest corner of 17th Street and Grand Avenue.

Total annual incidents responded to in 2006–2010 by the five fire stations serving the Project Site are indicated in Table IV.J.2-3 on page IV.J.2-6. Fire Station No. 10, the closest fire station to the Project Site, responded to 4,390 to 4,963 annual incidents during this five year timeframe, of which almost 75 percent were for EMS calls. As shown in this table the number of incidents have been increasing over time.

## (2) Emergency Access and Response Distance

Emergency vehicle access to the Project Site is currently available from Figueroa Street from the north and south; Olympic Boulevard, Pico Boulevard, and Venice Boulevard from the east and west; and freeway ramps exiting the SR-110 Harbor Freeway and I-10 Santa Monica Freeway. As described above, distances to the Project Site from the nearest fire stations range from 0.6 mile at Fire Station No. 10 to 1.8 miles at Fire Station No. 13, as shown in Table IV.J.2-1 on page IV.J.2-3. One of the criteria the LAFD uses to assess if a location receives adequate fire protection service within the Downtown Los Angeles area is if it is located within  $\frac{3}{4}$  mile of an engine company and 1 mile of a truck company. Based on the above data, the Project Site satisfies the distance criteria set forth by the LAFD through the presence of Fire Station No. 10, which is both an engine and truck company, at a distance of 0.6 miles from the Project Site.

## (3) Water Infrastructure for Firefighting Services

As discussed in Section IV.K.1, Utilities—Water, of this Draft EIR, in addition to providing domestic water service, LADWP also provides water for firefighting services. Water for firefighting purposes is supplied to the Project Site through several water mains, which feed 60 public fire hydrants located at regular intervals of approximately 250 feet throughout the Project Site. Within the water system serving the Project site vicinity, the existing average pressure is 53 pounds per square inch (psi). This represents the low static pressure, which is defined as the pressure within the water system during peak demand and maximum daily flow.

**Table IV.J.2-3**  
**5-Year Annual Incidents at Fire Stations Serving the Project Site**

| <b>Fire Station No.</b>                                                                                                                                                                                          | <b>Type of Incident</b> | <b>2007</b>  | <b>2008</b>  | <b>2009<sup>a</sup></b> | <b>2010<sup>a</sup></b> | <b>2011</b>  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------|--------------|-------------------------|-------------------------|--------------|
| <b>10</b>                                                                                                                                                                                                        | <i>EMS</i>              | 3,338        | 3,548        | 3,704                   | 3,648                   | 3,820        |
|                                                                                                                                                                                                                  | <i>Fire/Non-EMS</i>     | 1,110        | 1,125        | 1,259                   | 1,203                   | 1,146        |
|                                                                                                                                                                                                                  | <i>Total</i>            | 4,448        | 4,673        | 4,963                   | 4,851                   | 4,966        |
| <b>3</b>                                                                                                                                                                                                         | <i>EMS</i>              | 3,965        | 3,762        | 3,660                   | 3,491                   | 3,608        |
|                                                                                                                                                                                                                  | <i>Fire/Non-EMS</i>     | 1,344        | 1,506        | 1,308                   | 1,226                   | 1,206        |
|                                                                                                                                                                                                                  | <i>Total</i>            | 5,309        | 5,268        | 4,968                   | 4,717                   | 4,814        |
| <b>9</b>                                                                                                                                                                                                         | <i>EMS</i>              | 9,921        | 9,692        | 9,156                   | 9,526                   | 9,683        |
|                                                                                                                                                                                                                  | <i>Fire/Non-EMS</i>     | 2,022        | 1,901        | 1,816                   | 1,800                   | 1,853        |
|                                                                                                                                                                                                                  | <i>Total</i>            | 11,943       | 11,593       | 10,972                  | 11,326                  | 11,536       |
| <b>11</b>                                                                                                                                                                                                        | <i>EMS</i>              | 5,874        | 5,882        | 6,313                   | 6,239                   | 6,656        |
|                                                                                                                                                                                                                  | <i>Fire/Non-EMS</i>     | 1,520        | 1,484        | 1,426                   | 1,487                   | 1,516        |
|                                                                                                                                                                                                                  | <i>Total</i>            | 7,394        | 7,366        | 7,739                   | 7,726                   | 8,172        |
| <b>13</b>                                                                                                                                                                                                        | <i>EMS</i>              | 3,966        | 4,151        | 4,242                   | 4,203                   | 4,440        |
|                                                                                                                                                                                                                  | <i>Fire/Non-EMS</i>     | 808          | 839          | 820                     | 845                     | 755          |
|                                                                                                                                                                                                                  | <i>Total</i>            | <b>4,774</b> | <b>4,990</b> | <b>5,062</b>            | <b>5,048</b>            | <b>5,195</b> |
| <sup>a</sup> During these time periods the Modified Coverage Plan was in effect which decreased the number of units available each day.<br>Source: LAFD, written correspondence dated August 2011. Updated 2012. |                         |              |              |                         |                         |              |

#### (4) Recent Changes in the Delivery of Services by the LAFD<sup>1</sup>

Economic conditions over the last several years ago have resulted in greatly reduced revenues for the City, resulting in cutbacks in City services. As an example, in Fiscal Year 2009, the City requested that the LAFD cut its budget by 12 percent. In response to this condition, the LAFD operated with reduced services, in a program called the Modified Coverage Plan (MCP). This plan was implemented as an urgent method of containing an unexpected and substantial budget shortfall. Although initially implemented, the City sought ways to eliminate the MCP. As of fiscal year 2011–2012, the LAFD replaced the MCP with The Deployment Plan. While The Deployment Plan reduces the size of the LAFD due to the economic crisis, the LAFD's objective is to create a more

<sup>1</sup> City of Los Angeles Fire Department, *The New LAFD Deployment Plan*, <http://lafd.org/lafd-spotlight/136-spotlight-articles/416-the-new-lafd-deployment-plan>, accessed February 13, 2012.

effective LAFD using modern technology, focusing on neighborhood and individual needs (fire and EMS), as well as the ability to react when conditions dictate that resources be available to a specific threat.

For example, the LAFD determined that 84 percent of their daily responses are based around EMS needs, so the focus became using the proper apparatus, the right personnel and expertise, and with the best cost model. As a result, under The Deployment Plan, the LAFD realigned their response system to better support EMS calls by adjusting their mix of ambulances and assessment companies. Thus, the LAFD deploys 89 paramedic ambulances, 34 basic life safety (BLS) ambulances and 24 Ready Reserve ambulances across the City. Under The Deployment Plan the number of Paramedic assigned companies increased from 62 to 72. This realignment allowed the LAFD to suspend staffing for seven Light Forces and 11 Engines. However, these apparatus have not been removed from any fire station, and every station remains open. The staffing from these 18 companies have been used to fill vacant positions.

The LAFD on a daily basis evaluates needs and responses, and as needs dictate, may continue to evolve The Deployment Plan to ensure the best possible coverage to the public. Under The Deployment Plan, all fire stations have been kept open and since each fire station maintains a minimum of one fire suppression resource and one paramedic unit, response times will not change. As such, Fire apparatus from each "First In" district can reach any address within their district within an estimated five (5) minute period of time.

## **b. Regulatory Framework**

There are numerous State and local plans and regulations governing fire protection that are relevant to and would be implemented by the Proposed Project. These regulations are provided in Appendix G of this Draft EIR. As discussed therein, at the State level, relevant regulations include the California Building Code (CBC), which includes fire safety standards. In addition, the California Fire Code (CFC) is part of the CBC. At the local level, Section 520 of the Los Angeles City Charter 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 conduct fire investigations and protect lives and property in case of disaster or public calamity. Additionally, the City of Los Angeles General Plan Framework sets forth goals, objectives, and policies for fire protection and EMS in the City and contains policies related to the City's response to hazards and natural disasters, including fires. Lastly, the Los Angeles Municipal Code contains, by reference, the CBC building construction standards, including the CFC, as well as reflects the policies of the General Plan Safety Element and 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. The LAMC also addresses access, fire flow requirements, hydrants, and land use-based requirements for fire hydrant spacing and type.

### 3. Environmental Impacts

#### a. Methodology

The *City of Los Angeles CEQA Thresholds Guide* states that the analysis of project impacts on fire protection services should consider a project's land use, fire-related needs (e.g., use of hazardous materials), and whether the project site is within the recommended response distance to achieve fire safety requirements. Project design features which would reduce or increase the demand for fire protection services should also be considered. As part of the analysis, consultation with the LAFD was conducted via email, written letter, phone interview with staff and through the LAFD website. The LAFD evaluates project impacts on fire protection and emergency medical services on a project-by-project basis.

#### b. Thresholds of Significance

Appendix G of the CEQA Guidelines provides a sample question that addresses impacts with regard to fire protection service. This question is as follows:

- “Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

. . .

Fire Protection?”

The *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on fire protection services if it:

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

Given the special nature of the Event Center, City Planning, in consultation with the LAFD, has determined that this threshold shall be applied in light of the potential life safety

risks and needs that may arise with as large a public assembly facility , such as the need for additional EMS communications equipment.

### **c. Project Design Features**

During construction of the Proposed Project, the following would occur:

- Fire inspectors would be assigned to the Project Site as needed during relevant construction phases.
- Construction managers and personnel would be trained in emergency response and fire safety operations;
- Fire suppression equipment specific to Project construction would be maintained on the construction sites in accordance with OSHA and Fire Code requirements; and
- A Construction Traffic Management Plan would be implemented as part of the Project to address management of traffic and access during construction.
- The Event Center Applicant and the LAFD would develop a response access plan for both construction and operations in consultation with the LAFD. This plan shall be prepared in coordination with the Proposed Project's Transportation Management and Comprehensive Security Plans.

With regard to operation, the Event Center Applicant would prepare a Fire Life Safety Resources Management Plan in consultation with, and approved by, the LAFD to establish the response procedures that would be invoked in the event of a major incident at the Event Center requiring LAFD resources.

In addition, new buildings developed at the Project site would incorporate building design features that would comply with applicable LAMC fire safety requirements, including LAMC Article 7 (Fire Code) of Chapter V (Public Safety and Protection) and Article 1 (Building Code) of Chapter IX (Building Regulations). Fire safety design features would include and are not limited to the following: fire-resistant building materials, emergency and fire control elevator in each bank of elevators, a fire alarm system throughout the buildings, a standby emergency power system, smoke detection systems in all buildings, emergency exit signage on all floors of new buildings, a separate Fire Control Station in high-rise buildings, automatic sprinkler systems, and portable fire extinguishers in all the buildings. In addition, the Convention Center Applicant and Event Center Applicant would develop a first responder communications plan for their respective structures in consultation with, and approved by, the LAFD. The plan shall address the need for communications equipment, such as repeaters. Further, a plot plan would be submitted to LAFD for approval prior to

approval of a building permit. The plot plan would include the following minimum design features:

- Fire lanes, where required, would be a minimum of 20 feet in width clear to sky, posted with a sign of no less than three square feet in area and/or painted with “Fire Lane No Parking”, and have an adequate approved turning area. When a fire lane must accommodate the operation of LAFD aerial ladder apparatus or where fire hydrants are installed, those portions would not be less than 28 feet in width;
- Access for LAFD apparatus and personnel to and into all structures would be provided;
- The locations and sizes of all fire hydrants would be identified; and
- All structures would be within 300 feet of an approved fire hydrant.

The Proposed Project would also provide the necessary water infrastructure (e.g., new water connections) to serve the fire water demands of the Proposed Project, as well as any extensions to connect the Project Site to existing water lines in the area. Existing water connections would be used where appropriate.

In addition, the operator of the Event Center would provide or cause to be provided ambulance services such that one ambulance is on-site in accordance with the provisions of the Fire Life Safety Resources Management Plan. Further, the operators of the Convention and Event Center would provide an ambulance station with adequate resources for basic life support and advanced life support services at all Event Center events, per the provisions of the Fire Life Safety Resources Management Plan. In addition, the Fire Life Safety Resources Management Plan and first responder communications plan would be updated from time to time based on information that may be learned during operation of the Proposed Project, potential changes in LAFD’s available resources, and possible competing demands on these resources due to cumulative development.

The LAFD would also be one of the agencies that would staff the on-site Unified Field Command Center during large special events, as described in Section IV.J.1, Police Protection, of this Draft EIR. From this Center, both Applicants and affected agencies including LAFD, City of Los Angeles Police Department (LAPD), Los Angeles Department of Transportation (LADOT), Metro, Caltrans, California Highway Patrol (CHP), Los Angeles Emergency Management Department (LAEMD), and Federal Bureau of Investigation (FBI), would be able to monitor pedestrian, transit, and vehicle traffic and other events as they unfold, and make coordinated and united decisions. The establishment of an integrated command area would provide for an environment to facilitate successful collaboration of these entities. The Unified Field Command Center would include the following components:

monitors for the various agencies, voice and data connectivity, flexible workspace furniture, 2-3 breakout/meeting rooms, and restrooms. It would be designed to supplement or augment the existing camera center located within STAPLES Center, and the existing operations and management centers of each of the agencies.

## **d. Project Impacts**

### **(1) Construction Impacts**

The primary concern with regard to fire protection services during the Project's construction phases would involve temporary closures of public street lanes and limited street segments that currently provide vehicular access for LAFD response units. As discussed in the assessment of traffic impacts in Section IV.B.1, Transportation, of this Draft EIR, temporary closures of Pico Boulevard, L.A. Live Way, Chick Hearn Court, 12th Street, Bond Street, and Figueroa Street are anticipated at different times for different durations during the 5-year construction program. Closures could affect a single lane, multiple lanes or the entire roadway segment for periods of up to one year associated with the construction of the New Hall and the two new parking garages, and one lane on L.A. Live Way and Chick Hearn Court for up to three years for construction of the Event Center. When this occurs, alternate routes to respond to a fire or emergency medical situation would need to be taken. As a consequence, response times from the local fire stations when they travel adjacent to the Project Site could be adversely impacted. As discussed in Section IV.B.1, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented throughout the construction phases, to minimize disruptions to through traffic flow, efficiently redistribute traffic to alternate routes, and to ensure that emergency vehicle access to the Project Site and neighboring land uses is maintained at all times.

Another concern during construction involves the potential for accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. Construction contractors and the work crews would implement the following measures to minimize these hazards during construction of the Proposed Project: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur. Please refer to Section IV.L, Environmental Hazards, of this Draft EIR for additional information. Therefore, construction-related impacts related to fire protection services would be less than significant with the incorporation of the Proposed Project's design features.

## (2) Operational Impacts

Development of the Event Center, the New Hall, and the two new parking garages would increase the demand for LAFD services to respond to primarily emergency medical situations, and to structural fires to a lesser degree, and to hazardous materials release incidents to an even lesser degree. With a maximum height of 220 feet, the Event Center would be classified as a high rise structure, and would be subject to additional design standards set forth by the LAFD. To the extent the New Hall and the two new parking structures include an occupied floor above 75 feet in height, they would be subject to the additional high-rise requirements as established in the LAMC. Potential fire hazards would be reduced through compliance with numerous construction and LAMC standards affecting structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, building sprinkler systems, helicopter access, etc., as noted in the discussion of LAMC requirements in the Regulatory Setting and Project Design Feature sections presented earlier in the Draft EIR section.

Nonetheless, possible impacts to LAFD fire protection service levels resulting from the increased building area, building height, and higher occupancies, are analyzed with respect to LAFD resources, response distances and access, and the sufficiency of the water infrastructure to provide the necessary fire flows. Each of these possible impacts is discussed below.

### *(a) Facilities and Equipment*

The Convention Center's forecasted growth, as discussed in Section II, Project Description, of this Draft EIR, would be due to an increase in the number of days when higher attendance levels occur rather than growth in individual peak daily attendance. This is evidenced by the forecasted 48 percent increase in annual attendance vs. the forecasted 15 percent increase in daily attendance.<sup>22</sup> In terms of a conservative worst case scenario, there may be rare occasions such as during the Greater Los Angeles Auto Show, when overall attendance at the Convention Center and the Event Center could reach approximately 100,000 persons at any given time. In addition, the Event Center Applicant has agreed that an event at STAPLES Center would not occur at the same time as a full attendance ticketed event at the Event Center.

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<sup>22</sup> Based on forecasted existing annual and daily attendance levels of 2,708,262 per year and 17,000 persons per day; and a future forecasted annual attendance levels of 4,138,660 and daily forecasts of and 19,500.

Based on current forecasts most events at the Event Center would occur on a weekend day, and in the evenings during the weekday. A large portion of the service population for the fire stations located in the Project area relate to the large daytime population associated with the Downtown business community. As such, the operating hours of the Event Center would not coincide with the time periods when the greatest demands currently occur for the local fire stations. Moreover, the increase in service population brought about by activities at the Event Center is anticipated to be well below what occurs during the current daytime weekday period. Further, the Event Center would become another major facility in an area of the City that is currently populated by a number of existing major facilities and employment locations. However, due to the overall size of the facility and the nature of the incidents that may occur, additional resources, particularly with regard to the delivery of emergency medical services, would be required. In recognition of these potential impacts, project design features requiring the operator of the Event Center to provide or cause to provide ambulance services such that one ambulance is on-site at all sporting events and other events as may be determined appropriate by the Applicant and LAFD under the Fire Life Safety Resources Management Plan. To further respond to the demands the Proposed Project would place on the LAFD, the operator of the Event Center would provide an ambulance station with adequate resources for basic life support and advanced life support at all Event Center events. In addition, the LAFD has confirmed that the existing emergency helicopter landing site at the top of the parking structure located at the northwest corner of 17th Street and Grand Avenue is adequate to serve the Proposed Project.

In addition, the LAFD would be one of the public agencies that would staff the Unified Command Center and participate in the preparation and implementation of the Proposed Project's Comprehensive Security Plan. This plan, as described in detail in Section IV.J.1, Police, of this Draft EIR, would address issues including, but not limited to, promoting safety and security among attendees and the surrounding community, implementing and maintaining an effective access and control program, deterring disruptive behavior, maintaining effective emergency response resources, and establishing and enforcing internal venue event policies. The preliminary CSP incorporates a variety of long-term operational strategies, and includes consideration of potential impacts resulting from concurrent multiple large scale events in the greater downtown Los Angeles area. Specific design, operational, and programmatic measures have also been included in the preliminary CSP to enhance response to emergencies of various kinds, provide for large crowd management, reduce potential conflicts between vehicles and pedestrians, and establish an effective and integrated means of command and control that benefits the entire Central City area.

While unlikely and highly infrequent, the potential exists for a major fire event or natural disaster (e.g., earthquake) to occur that would require response by multiple fire

stations in the area. Given the anticipated infrequency of such an event, the proposed Fire Life Safety Resources Management Plan would include an emergency plan that sets forth, among other provisions, the pre-deployed the on-site and off-site resources required to respond to a major emergency event at the Event Center.

In conclusion, the project design features that would be required to be implemented during Proposed Project development, including, but not limited to, those described above as well as the Fire Life Safety Resources Management Plan and the LAFD's participation in the Proposed Project's Comprehensive Security Plan and staffing of the Unified Command Center would reduce Proposed Project impacts to LAFD facilities and equipment to a less than significant level.

*(b) Response Distance and Access*

From a location standpoint, the Project Site is well within required distances from existing truck and engine-equipped fire stations, with Station No. 10, the first-in-responder, located 0.6 mile away and is the only station that meets LAFD's distance criteria. Three other truck and/or engine equipped stations are located less than 1.5 miles from the Project Site. The Project Site therefore falls within the desired response distances.<sup>3</sup> As such, impacts with regard to distances to LAFD facilities would be less than significant.

Multiple points of access to the Project Site, as shown in Figure II-9 in Section II, Project Description, of this Draft EIR, would be provided. As a result, the Project would not result in significant impacts due to inadequate emergency vehicle access.

Increased vehicular traffic generated by the Project would result in significant impacts at a number of intersections, freeway ramps and segments of mainline freeways in the Downtown area, on the peak event days or nights, including weekday and weekend events. During these periods of heightened traffic levels, response times to the Project Site and immediately adjacent locations could be significantly impaired as emergency vehicles find it more difficult to move through the heavy traffic. However, the drivers of emergency vehicles are highly experienced in navigating through areas of high traffic volumes using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, the Proposed Project's Transportation Management Plan would include features to facilitate emergency vehicle access/egress. Refer to Section IV.B.1., Transportation, of this Draft EIR, for a complete description of the proposed Transportation Management Plan. With implementation of the above measures, temporary traffic impacts would result

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<sup>3</sup> John Dallas, Fire Inspector II, Los Angeles Fire Dept. Hydrants and Access Unit, email communication on August 19, 2011.

in a less than significant impact on emergency vehicle access to the Project Site and other parts of Downtown Los Angeles.

*(c) Fire Flow*

Based on the characteristics of the Proposed Project, the LAFD has concluded that a fire flow of at least 12,000 gallons per minute would be required to be available to the block where the Proposed Project would be located. Upgrades to the existing water infrastructure serving the Project site may be required to meet City Fire Code fire flow standards for the new Event Center and the New Hall. This could involve replacement of one or more of the water mains, replacement/relocation/additional fire hydrants, and possibly water storage facilities on-site. Specific water infrastructure improvements required to achieve fire flow standards would be determined by the Los Angeles Department of Water and Power through hydraulic modeling, as part of the City's standard construction plan check and permitting process. Construction of required water infrastructure improvements, as set forth in Section IV.K.1, Utilities—Water, of this Draft EIR, would reduce fire flow impacts to a less than significant level.

## **4. Cumulative Impacts**

### **(1) Construction**

As with the Proposed Project, construction activities associated with the related projects could involve temporary closures of public street lanes and limited street segments that currently provide vehicular access for LAFD response units. However, like the Proposed Project, it is expected that the related projects would also implement transportation management plans throughout the construction process that would minimize disruptions to through traffic flow, efficiently redistribute traffic to alternate routes, and to ensure that emergency vehicle access is maintained at all times. In addition, every related project would be reviewed by the LAFD as part of the normal building permit process, and appropriate measures would be identified to address potential impacts on LAFD resources. Thus, the combined cumulative impacts on LAFD resources associated with the Project's incremental effect and the effects of the related projects during construction would be less than significant.

Projects with construction underway during the same timeframe as the Proposed Project may also result in an increased potential for accidental on-site fires from the operation of mechanical equipment and the use of flammable construction materials. As discussed above, construction contractors and work crews would implement measures to minimize these hazards during construction of the Proposed Project, such as the maintenance of mechanical equipment in good operating condition, careful storage of

flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials. Similar measures would also be expected to be imposed on related projects during the normal building permit process and would be implemented as part of the construction of these related projects. Thus, cumulative impacts associated with the provision of fire protection services during construction would be less than significant.

## (2) Operation

Most of the 133 other related projects are currently underway in various stages of construction and planning within the central Los Angeles area (see Section III, Overview of Environmental Setting, of this Draft EIR). These related projects are located within the service areas of the five fire stations affected by the Proposed Project. All of these projects are not likely to be fully developed and operational by the projected Project completion. However, a conservative analysis assumes that they could be completed and therefore have a potential to combine with the effects of the Project to increase the cumulative demand for LAFD resources. As these projects would occur within the existing urban area of the city, they would be located within an acceptable distance of one or more existing fire stations. Cumulative impacts involving distances to fire stations would thus be less than significant. Each project is subject to the City's routine 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 use involved. Through this existing regulatory process, significant cumulative impacts due to improper design features or deficient fire flow water infrastructure would be avoided.

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 apparatus, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD resource needs would be identified and monies allocated according to the priorities at the time. Historically, this regular budgeting program has been successful in supporting LAFD needs and allocating funds to expand department resources, while maintaining a desired level of service. In the current economic climate, however, many funding sources for a variety of City services, including the LAFD, have been significantly reduced. This situation of difficult changes in the economy and reduction in tax and fee revenues to support City services could continue for an indefinite period of time. These circumstances could hamper and delay funding of additional LAFD resources that may be needed to respond to growth, as well as impact current service levels. One possible effect on current service levels could be some loss in redundancy capacity to ensure that every fire station has alternative coverage in the event its full crew is responding to a multiple alarm fire outside of its first-in responsibility area. The Project would not worsen this situation directly; however, by increasing potential

demand on the LAFD, especially if there is a multiple alarm fire on-site, the Project would indirectly contribute to a potentially adverse cumulative effect occurring on a citywide basis, and specifically involving the five fire stations that serve the Site and the Central City area. Project-related impacts would be reduced to less than cumulatively considerable through implementation of a Fire Life Safety Resources Management Plan. Through the implementation of the project design features identified above, the impacts of the Proposed Project would be reduced such that they would not be cumulatively considerable. Thus, the Proposed Project's cumulative impacts would be less than significant.

## 5. Project Design Features and Mitigation Measures

### a. Project Design Features

**Project Design Feature J.2-1:** Construction managers and personnel shall be trained in emergency response and fire safety operations.

**Project Design Feature J.2-2:** Fire suppression equipment specific to Project construction shall be maintained on the construction sites in accordance with OSHA and Fire Code requirements.

**Project Design Feature J.2-3:** Develop a response/access plan for both construction and operations in consultation with the LAFD. This plan shall be prepared in coordination with the Proposed Project's Transportation Management and Comprehensive Security Plans.

**Project Design Feature J.2-4:** Fire inspector(s) shall be assigned to the Project Site as needed during relevant construction phases.

**Project Design Feature J.2-5:** A plot plan shall be submitted to the LAFD for approval prior to approval of the first building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width clear to sky, posted with a sign of no less than three square feet in area and/or painted with "Fire Lane No Parking," and have an adequate approved turning area. When a fire lane must accommodate the operation of LAFD aerial ladder apparatus or where fire hydrants are installed, those portions would not be less than 28 feet in width;
- Access for LAFD apparatus and personnel to and into all structures would be provided;
- Identify the locations and sizes of all fire hydrants; and
- All structures would be within 300 feet of an approved fire hydrant.

**Project Design Feature J.2-6:** The Convention Center Applicant and Event Center Applicant shall develop a first responder communications plan for their respective structures in consultation with, and approved by, the LAFD. The plan shall address the need for communications equipment. The first responder communications plan shall be updated from time to time based on information that may be learned during operation of the Proposed Project, potential changes in LAFD's available resources, and possible competing demands on these resources due to cumulative development.

**Project Design Feature J.2-7:** The operator of the Event Center shall provide or cause to be provided ambulance services such that one ambulance is on-site in accordance with the provisions of the Fire Life Safety Resources Management Plan.

**Project Design Feature J.2-8:** The operators of the Convention Center and Event Center shall provide an ambulance station with adequate resources for basic life support and advanced life support services at all Event Center events, per the provisions of the Fire Life Safety Resources Management Plan (see Project Design Feature J.2.6).

**Project Design Feature J.2-9:** A Fire Life Safety Resources Management Plan shall be developed in consultation with, and approved by, the LAFD, prior to issuance of a certificate of occupancy for the Event Center. In the development of the Fire Life Safety Resources Management Plan, the Applicant and LAFD shall consult regarding the need for personnel, equipment and facilities. As part of the Plan, the Applicant shall provide funding as needed for event-day deployment of personnel and equipment in a manner that is appropriate to the type and size of events at the Event Center and consistent with measures undertaken for other large attendance venues. The Fire Life Safety Resources Management Plan shall be updated from time to time based on information that may be learned during operation of the Proposed Project, potential changes in LAFD's available resources, and possible competing demands on these resources due to cumulative development.

## **b. Mitigation Measures**

With the implementation of the project design features identified above, the LAFD's participation in the Proposed Project's Comprehensive Security Plan, and staffing of the Unified Command Center, Proposed Project impacts with regard to fire protection services during construction and operations would be reduced to a less than significant level. As such, no mitigation measures are required.

## **6. Level of Significance After Mitigation**

With implementation of the project design features identified above, the LAFD's participation in the Proposed Project's Comprehensive Security Plan, and staffing of the Unified Command Center, potential construction and long-term operations impacts on LAFD services would be reduced to a less than significant level.