

DOCKETED

Docket Number:	12-AFC-02C
Project Title:	Huntington Beach Energy Project - Compliance
TN #:	206751
Document Title:	Comment Letters from City Huntington Beach on AES Petition to Amend HBEP
Description:	Supersedes TN 206738 "Comment Letters From Huntington Beach Dept. of Public Works, Fire Department, and Dept. of Planning & Building on The AES Huntington Beach Energy Project Petition to Amend."
Filer:	Cathy Hickman
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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**HUNTINGTON BEACH
PUBLIC WORKS DEPARTMENT
PROJECT IMPLEMENTATION CODE REQUIREMENTS**

DATE: NOVEMBER 18, 2015
PROJECT NAME: AES HUNTINGTON BEACH ENERGY PROJECT (HBEP)
PETITION TO AMEND
ENTITLEMENTS: 12-AFC-02C
PLNG APPLICATION NO: 2012-0152
DATE OF PLANS: SEPTEMBER 2015
PROJECT LOCATION: 21730 NEWLAND STREET
PROJECT PLANNER: JANE JAMES, SENIOR PLANNER
TELEPHONE/E-MAIL: 714-536-5596 / JJAMES@SURFCITY-HB.ORG
PLAN REVIEWER: STEVE BOGART, SENIOR CIVIL ENGINEER *SB*
TELEPHONE/E-MAIL: 714-374-1692 / SBOGART@SURFCITY-HB.ORG
PROJECT DESCRIPTION: Petition to Amend the AES HBEP project approved by the California Energy Commission in October 2014

The following is a list of code requirements deemed applicable to the proposed project based on plans stated above. The list is intended to assist the applicant by identifying requirements which must be satisfied during the various stages of project permitting and implementation. A list of conditions of approval adopted by the Planning Commission in conjunction with the requested entitlement(s), if any, will also be provided upon final project approval. If you have any questions regarding these requirements, please contact the Plan Reviewer.

**THE FOLLOWING DEVELOPMENT REQUIREMENTS SHALL BE COMPLETED PRIOR
TO ISSUANCE OF A GRADING PERMIT:**

1. The following dedications to the City of Huntington Beach shall be shown on the Precise Grading Plan. (ZSO 230.84A)
 - a. Twelve feet (12') of additional right-of-way dedication shall be dedicated along the lease area limits of the Edison Avenue project frontage.
 - b. A 31-foot radius of additional right-of-way shall be dedicated at the southeast corner of Newland Street and Edison Avenue, per Public Works Standard Plan No. 207.
 - c. Necessary right-of-way to construct a turnaround at the easterly end of Edison Avenue, per Development Requirement No. 4.f below.

2. A Legal Description and Plot Plan of the dedications to the City shall be prepared by a licensed surveyor or engineer and submitted to Public Works for review and approval. The dedications shall be recorded prior to issuance of a grading permit.
3. A Precise Grading Plan, prepared by a Licensed Civil Engineer, shall be submitted to the Public Works Department for review and approval. The scope of this plan shall include the generating station site as well as all of the proposed temporary parking/construction laydown sites within the City of Huntington Beach. (MC 17.05)
4. A Street Improvement Plan, prepared by a licensed Civil Engineer shall be submitted to the Public Works Department for review and approval. (ZSO 230.84) The following public improvements shall be shown on the plan:
 - a. Curb and gutter along the project's Edison Avenue frontage, per Public Works Standard Plan No. 202. (ZSO 230.84)
 - b. A.C. paving, to the new construction centerline on Edison Avenue, plus an adequate feathered overlay section to provide a smooth pavement transition along the project's Edison Avenue frontage, within a 42 foot full-width street right-of-way per modified Public Works Standard Plan Nos. 104 (which includes an 8 foot parking lane on the north side of Edison Avenue, a 24-foot driving lane, a 6-foot parkway on the north and a 4-foot wide utility easement on the south side of Edison Avenue). (ZSO 230.84)
 - c. An ADA compliant access ramp shall be constructed at the southeast corner of Newland Street and Edison Avenue, per Caltrans Standard Plan A88A. (ZSO 230.84; GP, CE 2, ADA)
 - d. A 35-foot curb return radius shall be constructed at the southeast corner of Newland Street and Edison Avenue, per Public Works Standard Plan No. 207. (ZSO 230.84)
 - e. A 25-foot sight triangle shall be provided at the southeast corner of Newland Street and Edison Avenue. (ZSO 230.88)
 - f. A turnaround (shall be constructed at the easterly end of Edison Avenue. (ZSO 230.84)
 - g. A new driveway shall be constructed, per Public Works Standard Plan No. 211, to provide access from Edison Avenue to the proposed booster station site. (ZSO 230.84)
 - h. Street lights, consistent with current Public Works standards, shall be installed along the project's Edison Avenue frontage. (ZSO 230.84; GP, CE 2)
5. A signing and striping plan for Edison Avenue shall be prepared by a Licensed Civil or Traffic Engineer and be submitted to the Public Works Department for review and approval. The plans shall be prepared according to the City of Huntington Beach Signing and Striping Plan Preparation Guidelines. (ZSO 230.84)
6. Prior to the issuance of any grading or building permits for projects that will result in soil disturbance of one or more acres of land, the applicant shall demonstrate that coverage has been obtained under the Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ) [General Construction Permit] by providing a copy of the Notice of Intent (NOI) submitted to the State of California Water Resources Control Board and a copy of the subsequent notification of the issuance of a Waste Discharge Identification (WDID) Number. Projects subject to this requirement shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) conforming to the current National Pollution Discharge Elimination System (NPDES) requirements shall be submitted to the Department of Public Works for review and acceptance. A copy of the current SWPPP shall be kept at the project site and another copy to be submitted to the City. (DAMP)

7. A Project Water Quality Management Plan (WQMP) conforming to the current Waste Discharge Requirements Permit for the County of Orange (Order No. R8-2009-0030) [MS4 Permit] prepared by a Licensed Civil Engineer, shall be submitted to the Department of Public Works for review and acceptance. The WQMP shall address Section XII of the MS4 Permit and all current surface water quality issues.
8. Indicate the type and location of Water Quality Treatment Control Best Management Practices (BMPs) on the Grading Plan consistent with the Project WQMP. The WQMP shall follow the City of Huntington Beach; Project Water Quality Management Plan Preparation Guidance Manual dated June 2006. The WQMP shall be submitted with the first submittal of the Grading Plan.
9. A detailed soils and geological/seismic analysis shall be prepared by a registered engineer. This analysis shall include on-site soil sampling and laboratory testing of materials to provide detailed recommendations for grading, over excavation, engineered fill, dewatering, settlement, protection of adjacent structures, chemical and fill properties, liquefaction, retaining walls, streets, and utilities. (MC 17.05.150)
10. The applicant's grading/erosion control plan shall abide by the provisions of AQMD's Rule 403 as related to fugitive dust control. (AQMD Rule 403)
11. The name and phone number of an on-site field supervisor hired by the developer shall be submitted to the Planning and Public Works Departments. In addition, clearly visible signs shall be posted on the perimeter of the site every 250 feet indicating who shall be contacted for information regarding this development and any construction/grading-related concerns. This contact person shall be available immediately to address any concerns or issues raised by adjacent property owners during the construction activity. He/She will be responsible for ensuring compliance with the conditions herein, specifically, grading activities, truck routes, construction hours, noise, etc. Signs shall include the applicant's contact number, regarding grading and construction activities, and "1-800-CUTSMOG" in the event there are concerns regarding fugitive dust and compliance with AQMD Rule No. 403.
12. The applicant shall notify all property owners and tenants within 300 feet of the perimeter of the property of a tentative grading schedule at least 30 days prior to such grading.

**THE FOLLOWING DEVELOPMENT REQUIREMENTS SHALL BE COMPLIED WITH DURING
GRADING OPERATIONS:**

13. An Encroachment Permit is required for all work within the City's right-of-way. (MC 12.38.010/MC 14.36.030)
14. An Encroachment Permit is required for all work within Caltrans' right-of-way.
15. The developer shall coordinate the development of a truck haul route with the Department of Public Works if the import or export of material in excess of 5000 cubic yards is required. This plan shall include the approximate number of truck trips and the proposed truck haul routes. It shall specify the hours in which transport activities can occur and methods to mitigate construction-related impacts to adjacent residents. These plans must be submitted for approval to the Department of Public Works. (MC 17.05.210)
16. Water trucks will be utilized on the site and shall be available to be used throughout the day during site grading to keep the soil damp enough to prevent dust being raised by the operations. (California Stormwater BMP Handbook, Construction Wind Erosion WE-1)
17. All haul trucks shall arrive at the site no earlier than 8:00 a.m. or leave the site no later than 5:00 p.m., and shall be limited to Monday through Friday only. (MC 17.05)

18. Wet down the areas that are to be graded or that is being graded, in the late morning and after work is completed for the day. (WE-1/MC 17.05)
19. The construction disturbance area shall be kept as small as possible. (California Stormwater BMP Handbook, Construction Erosion Control EC-1) (DAMP)
20. All haul trucks shall be covered or have water applied to the exposed surface prior to leaving the site to prevent dust from impacting the surrounding areas. (DAMP)
21. Prior to leaving the site, all haul trucks shall be washed off on-site on a gravel surface to prevent dirt and dust from leaving the site and impacting public streets. (DAMP)
22. Comply with appropriate sections of AQMD Rule 403, particularly to minimize fugitive dust and noise to surrounding areas. (AQMD Rule 403)
23. Wind barriers shall be installed along the perimeter of the site. (DAMP)
24. All construction materials, wastes, grading or demolition debris and stockpiles of soils, aggregates, soil amendments, etc. shall be properly covered, stored and secured to prevent transport into surface or ground waters by wind, rain, tracking, tidal erosion or dispersion. (DAMP)

**THE FOLLOWING DEVELOPMENT REQUIREMENTS SHALL BE COMPLETED PRIOR TO
ISSUANCE OF A BUILDING PERMIT:**

25. A Precise Grading Permit shall be issued. (MC 17.05)

**THE FOLLOWING DEVELOPMENT REQUIREMENTS SHALL BE COMPLETED PRIOR TO
FINAL INSPECTION OR OCCUPANCY:**

26. All applicable Public Works fees shall be paid at the current rate unless otherwise stated, per the Public Works Fee Schedule adopted by the City Council and available on the city web site at http://www.surfcity-hb.org/files/users/public_works/fee_schedule.pdf. (ZSO 240.06/ZSO 250.16)



HUNTINGTON BEACH FIRE DEPARTMENT

PROJECT IMPLEMENTATION CODE REQUIREMENTS

DATE: NOVEMBER 17, 2015

PROJECT NAME: AES HUNTINGTON BEACH ENERGY PROJECT (HBEP)
AMENDMENT TO ORIGINAL PROPOSAL

PLANNING APPLICATION NO. 2012-0152

ENTITLEMENTS: APPLICATION FOR CERTIFICATION (12-AFC-02)

DATE OF PLANS: SEPTEMBER 14, 2015

PROJECT LOCATION: 21730 NEWLAND STREET

PLAN REVIEWER: STEVE EROS; FIRE PROTECTION ANALYST

TELEPHONE/E-MAIL: 714-536-5531

PROJECT DESCRIPTION: Amendment to change approved Application for Certification (AFC) for the Huntington Beach Energy Project (HBEP). The original AFC was approved on October 29, 2014 by the energy commission. On September 14, 2015, AES Southland, LLC submitted a petition to amend the final decision for HBEP. To replace the existing AES power generating station with a natural gas-fired, combined cycle, air-cooled, 939-megawatt (MW) electrical generating facility on the 28.6 acre facility. The redesign project would total 844 MW and be constructed in two phases. Phase 1 would be a natural gas-fired, combined-cycle, air-cooled, 644 MW electrical facility. Phase 2 would be two 100 MW simple-cycle gas turbines.

The following is a list of code requirements deemed applicable to the proposed project based on plans received and dated September 14, 2015. The list is intended to assist the applicant by identifying requirements which must be satisfied during the various stages of project permitting and implementation. A list of conditions of approval adopted by the Planning Commission in conjunction with the requested entitlement(s), if any, will also be provided upon final project approval. **The project is required to comply with all of the adopted Building, Fire, and Municipal Codes in effect at the time of grading and building plan submittal for permit issuance.** If you have any questions regarding these requirements, please contact the Plan Reviewer- Fire: Steve Eros, Fire Protection Analyst

PRIOR TO DEMOLITION, GRADING, SITE DEVELOPMENT, ISSUANCE OF GRADING PERMITS, BUILDING PERMITS, AND/OR CONSTRUCTION, THE FOLLOWING SHALL BE REQUIRED:

Currently, the Fire Department Access to the project does not comply with the local laws, ordinances, regulations, and standards (LORS). Figure 2-1.1 shows the proposed Fire Access Road which currently does not comply with the access road requirements. A plan will need to be developed to show the fire department access road widths and turning radii are identified on the plans. Plans will need to be created for each phase of the project to show compliance with the fire department access requirements stated in City Specification #401 and the “Worker Safety -6 Emergency Access Plan” found in the CEC Final Decision report for this project (Requirements listed below). A secondary fire department access point was not shown on the amended site plans and will need to comply with City Specification #401. All portions of the fire access road shall be 26 feet in width, comply with turning requirements specified in City Specification #401, and an approved Hbfd turnaround will need to be provided if a lane travels more than 150’ without being able to turn around. The Fire Access Road is required to extend within 150’ of all portions of the first floor of any proposed structures as per Section 503 of the California Fire Code and Section 503 of the Huntington Beach Fire Code. A plan will need to be developed to show that the entire first floor perimeter of the proposed structures are within 150 feet of adjacent fire department access lanes.

WORKER SAFETY-6 EMERGENCY ACCESS PLAN (From Final Commission Decision dated 10/29/2014)

The project owner shall prepare an Emergency Access Plan that shows all of the following: (1) a 26-foot wide fire lane that will provide a continuous loop around HBEP Block 1; (2) a 26-foot wide fire lane that will provide a continuous loop around HBEP Block 2; (3) a 26-foot wide fire lane from the HBEP main entrance to the continuous loops referenced in (1) and (2) above; and (4) a 26-foot wide fire lane from a secondary access point to the continuous loops referenced in (1) and (2) above. Both access lanes shall connect to a public street. Corners must allow for clear travel of a minimum 17-foot inner radius and 45-foot outer radius (radius must be concentric). The fire lanes shall be designed and maintained to support the imposed loads of fire apparatus (75,000 lbs. load/12,000 point load) and shall be surfaced to provide all-weather driving capabilities. Fire lane signage shall be provided as per City of Huntington Beach Specification #415. The 26-foot wide fire lanes shall meet the applicable requirements of the California Fire Code, City of Huntington Beach Municipal Code Chapter 17.56 - Huntington Beach Fire Code, and the Huntington Beach Fire Department City Specifications.

VERIFICATION: At least 60 days prior to the start of construction of any structures or components listed in the CBO-approved master drawing and master specification list, or within a timeframe approved by the CPM, the project owner shall submit the Emergency Access Plan to the City Fire Department for review and timely comment, and to the CPM and CBO for review and approval.

The Site Plan should be revised to show that the Fire Department Access roads comply with City Specification #401 and the “Worker Safety -6 Emergency Access Plan” found in the CEC Final Decision report for this project (Requirements listed below).

Applicable Codes: Compliance with the following is required:

- N.F.P.A. Standards, including but not limited to N.F.P.A. 850 Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations.
- 2010 California Fire Code and referenced standards (i.e. NFPA 13, NFPA 24 and NFPA 72 [currently adopted editions], etc.)
- Huntington Beach Municipal Code Chapter 17.56 (Huntington Beach Fire Code)
- 2011 Huntington Beach Fire Code
- Huntington Beach Fire Department City Specifications 401, 403, 407, 409, 410, 415, 418, 420, 421, 422, 423, 424, 425, 427, 428, 429, 431-92, and 434.

Fire Protection Consultant: A Fire Protection Consultant qualified to design and prepare Fire Protection plans for power plants, shall submit plans to the H.B.F.D. showing compliance with the above codes and the requirements below.

Inspections: Inspections shall be coordinated with the Huntington Beach Fire Department, and inspection approval obtained by the H.B.F.D., to verify compliance with the approved plans and requirements contained within these Project Implementation Code Requirements and the aforementioned applicable codes.

Fire Apparatus Access

Fire Access Roads shall be provided and maintained in compliance with City Specification # 401, *Minimum Standards for Fire Apparatus Access*. Driving area shall be capable of supporting a fire apparatus (75,000 lbs and 12,000 lb point load). Fire access roads fronting commercial buildings shall be a minimum width of twenty-six feet (26') wide, with thirteen feet six inches (13' 6") vertical clearance. For Fire Department approval, reference and demonstrate compliance with City Specification # 401 *Minimum Standards for Fire Apparatus Access* on the plans. **(FD)**

Note: Plans need to be developed to show the location, dimensions, and turning radii for all proposed fire department access lanes for the site. The plans will need to show how Phase 1 and Phase 2 will show compliance with City Speciation #401 for Fire Department Access Lanes. A fire department access plan will also need to be developed for the Plains Marketing site.

Fire Access Road Turns and Corners shall be designed with a minimum inner radius of seventeen feet (17') and a minimum outer radius of forty five feet (45') per City Specification # 401 *Minimum Standards for Fire Apparatus Access*. For Fire Department approval, reference and demonstrate compliance with City Specification # 401 *Minimum Standards for Fire Apparatus Access* on the plans. **(FD)**

No Parking shall be allowed in the designated 24 foot wide fire apparatus access road or supplemental fire access per City Specification # 415. For Fire Department approval, reference and demonstrate compliance with City Specification # 415 *Minimum Standards for Fire Apparatus Access* on the plans. **(FD)**

Fire Lanes, as determined by the Fire Department, shall be posted, marked, and maintained per City Specification #415, *Fire Lanes Signage and Markings on Private, Residential, Commercial and Industrial Properties*. The site plan shall clearly identify all red fire lane curbs, both in location and length of run. The location of fire lane signs shall be depicted. No parking shall be allowed in the designated 24 foot wide fire apparatus access road or supplemental fire access per City Specification # 415. For Fire Department approval, reference and demonstrate compliance with City Specification # 401 *Minimum Standards for Fire Apparatus Access* on the plans. **(FD)**

Hose Pull Lengths – The fire apparatus access road shall comply with the requirements of Section 503.1.1 of the Huntington Beach Fire Code. All access roads shall extend to within 150 feet of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.

NOTE: Provide a plan that shows that the entire perimeter of ground floor of the proposed buildings will be within 150 feet of the fire department access lanes. (FD)

Secured Vehicle Entries shall utilize KNOX[®] activated access switches (Knox switches for automated gates, Knox padlocks for manual gates), and comply with City Specification #403, *Fire Access for Pedestrian or Vehicular Security Gates & Buildings*. Reference compliance in the plan notes. **(FD)**

Hazardous Materials

- a. **Flammable or Hazardous Materials Storage.** The storage of hazardous materials requires disclosure. Quantities of flammable liquids and other chemicals may be regulated by the Fire Code. Contact the Huntington Beach Fire Department Hazardous Materials Division (714-536-5676) regarding:

- Disclosure of on-site chemicals. Detail volume and types of materials.
- Compliance with HBFD Fire Code Chapter 27 – Hazardous Materials.
- Compliance with HBFD Fire Code Chapter 6 – Stationary Lead-Acid Battery Systems.
- Request information for the proper NFPA 704 signage and postage requirements.

For Fire Department approval, reference compliance with the following in the plan notes:

- Disclosure of on-site chemicals,
- HBFD Fire Code Chapter 27 – *Hazardous Materials*,
- NFPA 704 signage and postage requirements,
- HBFD Fire Code Chapter 6 – *Stationary Lead-Acid Battery Systems*.

(FD)

Environmental

Environmental

The AES property and the Plains All American site will need to show compliance with City Specification #429 and 431-92 prior to grading or building permits are issued.

- a. ***Methane Mitigation District Requirements.*** The proposed construction is within the City of Huntington Beach Methane Mitigation District and compliance with City Specification 429 is required. Soil gas testing for methane gas is required. A methane sample plan shall be submitted to the fire department for review and approval, prior to the commencement of sampling.

If methane gas is discovered in the soil, the following City Specification would be applicable and the grading, building, and methane plans must reference that a sub-slab methane barrier and vent system will be installed per City Specification # 429, *Methane District Building Permit Requirements* prior to plan approval. Additional methane mitigation measures may be required by the fire department.

Methane safety measures per *City Specification # 429, Methane District Building Permit Requirements* shall be detailed on a separate sheet titled "METHANE PLAN" and three copies submitted to the Fire Department for approval. **(FD)**

- b. ***City Specification # 431-92 Soil Clean-Up Standards testing is required.*** Based on site characteristics, suspected soil contamination, proximity to a producing/abandoned oil well, or Phase I, II, or III Site Audit, soil testing conforming to City Specification # 431-92 Soil Clean-Up Standards is required.

All soils shall conform to City Specification # 431-92 Soil Clean-Up Standards prior to the issuance of a building permit. Building plans shall reference that "All soils shall conform to City Specification # 431-92 Soil Clean-Up Standards" in the plan notes.

Note: Grading Plans must be approved by the Fire Department prior to issuance of a Public Works grading permit. Standard Fire Department notes are required to be on the plans on oil industry impacted sites.

Soil testing results must be submitted, and approved by the Fire Department prior to issuance of a building permit. **(FD)**

- c. ***"Remediation Action Plan"*** If contamination is identified, provide a Fire Department approved Remediation Action Plan (RAP) based on requirements found in Huntington Beach *City Specification #431-92, Soil Cleanup Standard*. Upon remediation action plan approval, a rough grading permit may be issued. **(FD)**

- d. **Discovery of soil contamination/pipelines**, etc., must be reported to the Fire **THE FOLLOWING CONDITIONS SHALL BE COMPLETED PRIOR TO ISSUANCE OF A BUILDING PERMIT:**
- e. **CURRENT or FORMER UST SITE (Underground Storage Tanks)**
Based on site characteristics, suspected soil contamination, hydraulic hoists, or proximity to former gas station, or underground storage tanks, the following is required:

“Soil Testing”.

- A soil testing plan conforming to *City Specification #431-92 Soil Clean-Up Standards* shall be submitted and approved by the Fire Department.
- All soils shall conform to *City Specification #431-92 Soil Clean-Up Standards*, and testing results must be submitted, and approved by the Fire Department prior to issuance of a grading or building permit.
- Reference that all soils shall be in compliance with *City Specification #431-92 Soil Clean-Up Standards* in the plan notes. **(FD)**

“Remediation Action Plan” If contamination is identified, provide a Fire Department approved Remediation Action Plan (RAP) based on requirements found in Huntington Beach *City Specification #431-92, Soil Cleanup Standard*. Upon remediation action plan approval, a rough grading permit may be issued. **(FD)**

- f. **Proof of OCHCA Site Closure or Corrective Action Plan.** Removal of flammable or combustible liquid underground storage tanks (UST) requires the applicant to submit one of the following to the Huntington Beach Fire Department:
- i. An approved Orange County Health Care Agency UST **Site Closure Letter**, or
 - ii. Provide an Orange County Health Care Agency UST **Corrective Action Plan** and written permission for co-existence.

If OCHCA requires on-going remediation and co-existence with the proposed development is permissible, a copy of the approved Orange County Health Care Agency plan and written permission for co-existence must be submitted in order to obtain Huntington Beach Fire Department approval. Each site will be evaluated on an individual basis.

Prior to building construction, all soils shall conform to *City Specification #431-92 Soil Clean-Up Standards*, and testing results must be submitted, and approved by the Fire Department prior to issuance of a grading permit. **(FD)**

- g. **Proof of South Coast Regional Water Quality Control Board Site Closure or Corrective Action Plan.** Removal of flammable or combustible liquid underground storage tanks (UST) requires the applicant to submit one of the following to the Huntington Beach Fire Department:
- a. An approved South Coast Regional Water Quality Control Board UST **Site Closure Letter**, or
 - b. Provide a South Coast Regional Water Quality Control Board UST **Corrective Action Plan** and written permission for co-existence.

If SCRWQCB requires on-going remediation and co-existence with the proposed development is permissible, a copy of the approved SCRWQCB plan and written permission for co-existence must be submitted in order to obtain Huntington Beach Fire Department approval. Each site will be evaluated on an individual basis.

California Regional Water Quality Control Board – Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348
Phone: (951) 782-4497
FAX: (951) 781-6288

(FD)

Conformance to City Specifications **DOES NOT** relieve the developer's responsibility regarding other concerned agency notification and/or approval (South Coast Regional Water Quality Control Board, South Coast Air Quality Management District, Department of Toxic Substance Control, County of Orange Health Care Agency, etc.).

Above Ground Storage Tank Removal

The Above Ground Storage tanks located at the Plains All American site will need to be demolished to all Huntington Beach City Specifications and California Fire Code requirements prior to the issuance of a grading permit of the site. The project proponent is to do their due diligence and investigate if outside authorities (OCHCA, RWQCB) will provide letters of closure for the removal of the tanks.

Oil Wells

There is one abandoned oil wells on the AES property and three oil wells on the Plains All American site. The oil well located on the AES property will need to be abandoned to the current DOGGR standard prior to grading or building permits being issued. The oil wells on the Plains All American Site are not required to be abandoned since the site will be leased and not developed. All plans associated with this site will need to show the location of the oil wells so that all proposed grading activities know the location of the wells and do not disturb them during construction.

DOGGR “CONSTRUCTION SITE REVIEW” is required. A California Division of Oil, Gas & Geothermal Resources (DOGGR – 714-816-6847), *Site Plan Review* is required for this project.

Identify the well name and well API number. Show the location of the abandoned oil well in question. Accurately locate with “x” and “y” parameters delineated. A completed DOGGR *Site Plan Review* must be on-file with the Fire Department prior to plan approval.

Wells identified in the Site Review not meeting current DOGGR requirements may require re-abandonment. If required, the following permits shall be obtained and submitted:

- From the Division of Oil, Gas & Geothermal Resources (DOGGR – (714) 816-6847), provide a *Permit to Conduct Well Operations* for all on-site active/abandoned oil wells.
- Obtain a Huntington Beach Fire Department *Permit to Abandon Oil Well* and follow the requirements of *City Specification #422, Oil Well Abandonment Permit Process*. Reference compliance with *City Specification #422, Oil Well Abandonment Permit Process* in the plan notes.
- Oil Well Vent Cones and vent piping will be required in accordance with City Specification 429.

NOTE: Both oil wells will need to be abandoned to the current DOGGR Standard. No grading permits or building permits can be issued until the oil wells have been brought to the current DOGGR Standard. Please notify the HBFD when permits to abandon have been pulled from DOGGR.

SITE DEVELOPMENT

Fire Hydrants and Water Systems

Fire Hydrants are required. Hydrants must be portrayed on the site plan. Hydrants shall be installed and in service **before** combustible construction begins. Installation of hydrants and service mains shall meet NFPA 13 and 24, Huntington Beach Fire Code Appendix B and C, and City Specification # 407 Fire Hydrant Installation Standards requirements. Maximum allowed velocity of fire flow in supply piping is 12 fps. Plans shall be submitted to Public Works and approved by the Public Works and Fire Departments. For Fire Department approval, portray the fire hydrants and reference compliance with NFPA 13 and 24, Huntington Beach Fire Code Appendix B and C, and City Specification #407 Fire Hydrant Installation Standards in the plan notes. **(FD)**

Private Fire Service Piping (FSP) Application for permit shall be made for private on-site Fire Service Piping (FSP), including but not limited to, private fire service mains and underground sprinkler laterals. Maximum allowed velocity of fire flow in supply piping is 12 fps. Additionally,

application for permit shall be made for fire protections systems (sprinklers, alarms, chemical, fire pumps, etc.) as applicable.

Permits may be obtained at the City of Huntington Beach Department Fire Department by completing a Fire Permit Form (available at Fire Administration) and submitting such plans and specifications as required by the bureau of fire prevention. A permit constitutes permission to begin work in accordance with approved plans and specifications. The permit fee includes plan checking and inspections by an authorized fire prevention inspector. Development reviews/approvals by the bureau of fire prevention during planning do not constitute approval to perform FSP or fire protection system work, unless otherwise noted. **(FD)**

Private Fire Service Connection to the Public Water Supply - Separate plans shall be submitted to the Public Works Department detailing the connection, piping, valves and back-flow prevention assembly (DDCA) for approval and permits. Approval by Public Works and the Fire Department must be completed prior to issuance of a grading permit. The dedicated private fire water service off-site improvements shall be shown on a precise grading plan, prepared by a Licensed Civil Engineer. **(FD)**

Fire Protection Systems

Fire Alarms

Fire Alarm System is required per the California Fire Code. For Fire Department approval, shop drawings shall be submitted to the Fire Department as separate plans for permits and approval. For Fire Department approval, reference and demonstrate compliance with the California Fire Code and referenced standards. A C-10 electrical contractor, certified in fire alarm systems, must certify the system is operational annually. **(FD)**

Fire Sprinklers

Automatic Fire Sprinklers and Special Extinguishing Systems are required in accordance with NFPA13, the California Fire Code (and referenced Standards), N.F.P.A. 850, and other applicable codes..

Separate plans (two sets) shall be submitted to the Fire Department for permits and approval. The system shall provide water flow, tamper and trouble alarms, manual pull stations, interior and exterior horns and strobes, 24-hour central station monitoring, and other components deemed necessary for fire and life safety.

Automatic fire sprinkler systems and Special Extinguishing Systems must be maintained operational at all times, with maintenance inspections performed in accordance with the California Fire Code (and referenced standards) and other applicable codes.

NOTE: When buildings under construction are more than one (1) story in height and required to have automatic fire sprinklers, the fire sprinkler system shall be installed and

operational to protect all floors lower than the floor currently under construction. Fire sprinkler systems for the current floor under construction shall be installed, in-service, inspected and approved prior to beginning construction on the next floor above. **(FD)**

Annual and Five Year Certification. Automatic fire sprinkler systems must be maintained operational at all times, with Inspection, Testing, and Maintenance performed in accordance with the California Fire Code, NFPA 25, and other applicable codes.

Class 1 Standpipes (2 ½" NFH connections) are required at each stairway. The standpipe system in stairwells cannot protrude into, impede, or compromise the H.B.B.C. "Exit Width" requirements. For Fire Department approval, reference and portray Class 1 standpipes at each stairway in the plan notes. **(FD)**

Fire Sprinkler Supply

Fire Department Connections (FDC) to the automatic fire sprinkler systems shall be located to the front of the building, at least 25 feet from and no farther than 150 feet of a properly rated fire hydrant. **(FD)**

NPFA 13 Commercial Fire Sprinkler Systems Supply shall be from a dedicated fire water service installed per Fire Department, Public Works, and Water Division Standards. The dedicated fire water service connection shall be a minimum of four inches (4") in size. Depending on fire sprinkler system demands, larger water service may be required. Separate plans shall be submitted to the Public Works Department for approval and permits, and must be completed prior to issuance of a grading permit. The dedicated fire water service off-site improvements shall be shown on a precise grading plan, prepared by a Licensed Civil Engineer. Contact Huntington Beach Public Works Department (714-536-5431) for offsite water improvement requirements. **(FD)**

Fire Sprinkler Underground

On-Site Fire Service Piping (FSP) Application for permit shall be made for on-site Fire Service Piping (FSP), including but not limited to, private fire service mains and underground sprinkler laterals. Maximum allowed velocity of fire flow in supply piping is 12 fps. Additionally, application for permit shall be made for fire protections systems (sprinklers, alarms, chemical, fire pumps, etc.) as applicable.

Permits may be obtained at the City of Huntington Beach Department Fire Department by completing a Fire Permit Form (available at Fire Administration) and submitting such plans and specifications as required by the bureau of fire prevention. A permit constitutes permission to begin work in accordance with approved plans and specifications. The permit fee includes plan checking and inspections by an authorized fire prevention inspector. Development reviews/approvals by the bureau of fire prevention during planning do not constitute approval to perform FSP or fire protection system work, unless otherwise noted. **(FD)**

Connection to the Public Water Supply - Separate plans shall be submitted to the Public Works Department detailing the connection, piping, valves and back-flow prevention assembly (DDCA) for approval and permits. Approval by Public Works and the Fire Department must be completed prior to issuance of a grading permit. The dedicated private fire water service off-site improvements shall be shown on a precise grading plan, prepared by a Licensed Civil Engineer. **(FD)**

Fire Protection Systems

Fire Extinguishers shall be installed and located in all areas to comply with Huntington Beach Fire Code standards found in *City Specification #424*. The minimum required dry chemical fire extinguisher size is 2A 10BC and shall be installed within 75 feet travel distance to all portions of the building. Extinguishers are required to be serviced or replaced annually. **(FD)**

Fire Personnel Access

The following items shall be completed prior to issuance of a certificate of occupancy.

Main Secured Building Entries shall utilize a KNOX® Fire Department Access Key Box, installed and in compliance with City Specification #403, Fire Access for Pedestrian or Vehicular Security Gates & Buildings. Please contact the Huntington Beach Fire Department Administrative Office at (714) 536-5411 for information. Reference compliance with City Specification #403 - KNOX® Fire Department Access in the building plan notes. **(FD)**

Fire Sprinkler System Controls access shall be provided, utilizing a KNOX® Fire Department Access Key Box, installed and in compliance with City Specification #403, Fire Access for Pedestrian or Vehicular Security Gates & Buildings. The approximate location of the system controls shall be noted on the plans. Reference compliance in the plan notes. **(FD)**

Addressing and Street Names

The following items shall be completed prior to issuance of a certificate of occupancy.

Structure or Building Address Assignments. The Planning Department shall review and make address assignments. The individual dwelling units shall be identified with numbers per City Specification # 409 Street Naming and Address Assignment Process. For Fire Department approval, reference compliance with City Specification #409 Street Naming and Address Assignment Process in the plan notes. **(FD)**

Commercial Building Address Numbers shall be installed to comply with City Specification #428, Premise Identification. Building address number sets are required on front and rear of the structure and shall be a minimum of six inches (10") high with one and one half inch (1 ½")

brush stroke. Note: Units shall be identified with numbers per City Specification # 409 Street Naming and Address Assignment Process. Unit address numbers shall be a minimum of four inches (4") affixed to the units front and rear door. All address numbers are to be in a contrasting color. For Fire Department approval, reference compliance with City Specification #428 Premise Identification in the plan notes and portray the address location on the building. **(FD)**

Building Construction

The following items shall be completed prior to issuance of a certificate of occupancy.

Emergency Responder Radio Coverage is required throughout all portions of the structure(s) as per Chapter 5 of the CFC. A separate plan must be submitted to the HBFD for method of addressing this requirement. System must be tested, certified and then inspected once building construction is primarily complete but before the certificate of occupancy will be issued. **(FD)**

Stairwell Required Minimum Widths. Standpipe systems in stairwell areas shall not impede code required minimum widths. **(FD)**

Exit Signs And Exit Path Markings will be provided in compliance with the Huntington Beach Fire Code and Title 24 of the California Administrative Code. Reference compliance in the plan notes. **(FD)**

Gates and Barriers shall be able to open without the use of a key or any special knowledge or effort. Gates and barriers in a means of egress shall not be locked, chained, bolted, barred, latched or otherwise rendered unable to open at times when the building or area served by the means of egress is occupied, and shall swing in the direction of travel when required by the Building Code for exit doors. **(FD)**

Posting Of Room Occupancy is required. Any room having an occupant load of 50 or more where fixed seats are not installed, and which is used for assembly purposes, shall have the capacity of the room posted in a conspicuous place near the main exit per CFC Chapter 10. **(FD)**

Egress Illumination/Emergency Exit Lighting with emergency back-up power is required. Provide means of egress illumination per HBFC 604.2.4 and UBC 1003.2.9. **(FD)**

Exit Ways and Aisles Plan is required for this project. HBFC section 408.2.1.Plans shall be submitted indicating the seating arrangement, location and width of exit ways and aisles for approval and an approved copy of the plan shall be kept on display on the premises. **(FD)**

Fire Master Plan

The Fire Master Plan shall be completed and approved prior to precise grading plan or building plan approval.

A separate Fire Master Plan is required for submittal to the HBFD. It shall be a site plan reflecting all the following fire department related items:

- Fire hydrant locations, public and private.
- FDC locations.
- Dimensions from FDC's to hydrants.
- DCDA locations.
- Fire sprinkler riser locations and location of system serving.
- FACP locations.
- Knox box and knox switch locations.
- Gate locations, and opticoms if required.
- Fire lane locations, dimensions, lengths, turning radii at corners and circles/cul-de-sacs.
- Fire lane signage and striping.
- Property dimensions or accurate scale.
- Building locations and heights.
- Building addresses and suite addresses. **(FD)**

GIS Mapping Information

- a. **GIS Mapping Information** shall be provided to the Fire Department in compliance with GIS Department CAD Submittal Guideline requirements. Minimum submittals shall include the following:
 - Site plot plan showing the building footprint.
 - Specify the type of use for the building
 - Location of electrical, gas, water, sprinkler system shut-offs.
 - Fire Sprinkler Connections (FDC) if any.
 - Knox Access locations for doors, gates, and vehicle access.
 - Street name and address.

Final site plot plan shall be submitted in the following digital format and shall include the following:

- Submittal media shall be via CD rom to the Fire Department.
- Shall be in accordance with County of Orange Ordinance 3809.
- File format shall be in .shp, AutoCAD, AUTOCAD MAP (latest possible release) drawing file - .DWG (preferred) or Drawing Interchange File - .DXF.

- Data should be in NAD83 State Plane, Zone 6, Feet Lambert Conformal Conic Projection.
- Separate drawing file for each individual sheet.
In compliance with Huntington Beach Standard Sheets, drawing names, pen colors, and layering convention. and conform to *City of Huntington Beach Specification # 409 – Street Naming and Addressing*.

For specific GIS technical requirements, contact the Huntington Beach GIS Department at (714) 536-5574.

For Fire Department approval, reference compliance with *GIS Mapping Information* in the building plan notes. **(FD)**

THE FOLLOWING CONDITIONS SHALL BE MAINTAINED DURING CONSTRUCTION:

- a. Fire/Emergency Access And Site Safety shall be maintained during project construction phases in compliance with HBFC Chapter 14, Fire Safety During Construction And Demolition. **(FD)**

OTHER:

- a. Discovery of additional soil contamination or underground pipelines, etc., must be reported to the Fire Department immediately and the approved work plan modified accordingly in compliance with City Specification #431-92 Soil Clean-Up Standards. **(FD)**
- b. Outside City Consultants The Fire Department review of this project and subsequent plans may require the use of City consultants. The Huntington Beach City Council approved fee schedule allows the Fire Department to recover consultant fees from the applicant, developer or other responsible party. **(FD)**

Fire Department City Specifications may be obtained at:
Huntington Beach Fire Department Administrative Office
City Hall 2000 Main Street, 5th floor
Huntington Beach, CA 92648

or through the City's website at **www.surfcity-hb.org**

If you have any questions, please contact the Fire Prevention Division at (714) 536-5411.



City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

DEPARTMENT OF PLANNING AND BUILDING

www.huntingtonbeachca.gov

Planning Division

714.536.5271

Building Division

714.536.5241

November 20, 2015

Mr. John Heiser
California Energy Commission
Project Manager
1516 Ninth Street,
Sacramento, CA 95814

**SUBJECT: CITY OF HUNTINGTON BEACH COMMENTS REGARDING
PETITION TO AMEND HUNTINGTON BEACH ENERGY PROJECT
DOCKET NO. 12-AFC-02C**

Dear Mr. Heiser:

In a letter dated October 16, 2015, the California Energy Commission requested the City of Huntington Beach conduct a review of the Petition to Amend the Huntington Beach Energy Project (12-AFC-02). We appreciate the opportunity to review AES Southland Development, LLC's Petition to Amend as submitted to the California Energy Commission on September 14, 2015. In addition to a general review, your letter asked the City to determine whether any proposed modifications to the licensed HBEP present major issues or concerns. Our general response to these items is:

1. The LORS administered by the City are discussed in the comments that follow and in the attached list of typical code requirements, standards, and regulations from Public Works and Fire Department that the City of Huntington Beach would apply toward this project but for the CEC's permitting authority.
2. The description of the proposed modifications in Section 1.2 does not include the newly proposed 50 ft. high wall along the south easterly side of the project site. The Petition to Amend should include the location, dimension, materials, and any corresponding amendments to the conceptual landscaping plans proposed for this substantial wall.
3. The description of the proposed modifications in Section 1.2 does not include proposed signal modifications, demolition of existing berm, and restriping at the intersection of Banning Avenue and Magnolia Avenue.
4. The Petition to Amend should address cumulative impacts of demolition, construction, access, and new intersection modifications/ traffic plan with grading, hauling and

construction activities associated with remediation at the Ascon site and potentially the Poseidon project.

5. The proposed project is larger and taller than the previously licensed power blocks and air cooled condensers. At the request of AES, the City has preliminarily reviewed a conceptual new visual screening design. The City has begun the process of evaluating the new screening plan and anticipates obtaining input from the City's Design Review Board along with an informational presentation to the City Council in the first quarter of 2016.
6. The Petition to Amend should include comparisons between heights of licensed project and proposed amended project.
7. The revised power plant exceeds total height by even more than previously contemplated and should be evaluated for consistency with LORS and previous City Council recommendations.
8. A coastal development permit and mitigated negative declaration were previously approved for demolition of above ground tanks and transmission lines at the Plains All American tanks site. The Petition to Amend should include compliance with all previously adopted conditions of approval contained within those entitlements.
9. The CEC should require complete removal of Units 1 and 2 rather than rely on voluntary removal as described in the Petition to Amend. Additionally, the City believes the CEC should require removal of Units 3 and 4 prior to operation of any new portion of the power plant.
10. Proposed access to the site from Edison Drive may require street dedication and improvement to ultimate right-of-way and should be addressed in the Petition to Amend.
11. Please provide a traffic impact analysis of the proposed signalized intersection modification at Magnolia Street and Banning Avenue that is discussed in the HBEP Petition to Amend. The analysis should include, but not limited to: examining existing and project conditions, analysis of intersections and streets in proximity of the modified intersection affected by the redistribution of vehicle trips to the proposed driveway, cumulative analysis, and determination of why the former Plains All American Tank Farm site's northerly driveway is not a feasible alternative access location from Magnolia Street. The information as a result of the traffic analysis should be included in Section 5 of the HBEP Petition to Amend.
12. Intersection, signal, and street striping/signing modifications within the public right-of-way require engineered plans to be reviewed and approved by Public Works prior to obtaining an encroachment permit from the City of Huntington Beach. Engineering plans submitted to Public Works shall comply with Public Works Standards and are required to be prepared and stamped by a state licensed civil engineer.

Thank you for the opportunity to review and provide these initial staff comments on this important project in the City of Huntington Beach. We are committed to participating in the CEC processing

of the application to ensure a high quality outcome for the citizens of Huntington Beach. Please do not hesitate to contact me at 714-536-5596 if you have any questions or need any additional information.

Sincerely,



Jane James
Planning Manager

Attachment: Code Requirements from Public Works and Fire Department dated November 18, 2015

cc: Fred Wilson, City Manager
Ken Domer, Deputy City Manager
Scott Hess, Director of Community Development
Antonia Graham, Senior Administrative Analyst
Bill Reardon, Fire Battalion Chief
Steve Eros, Fire Protection Analyst
Debbie DeBow, Principal Civil Engineer
Steve Bogart, Senior Civil Engineer
Darren Sam, Transportation Division
Mark Carnahan, Permit and Plan Check Manager
Dave Dominguez, Facilities, Development & Concessions Manager