

DOCKETED

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Document Title:	City of HB â€™ Comments on fire road/landscaping plan
Description:	N/A
Filer:	April Dearbaugh
Organization:	California Energy Commission / David Flores
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From: Flores, David@Energy
Sent: Monday, August 11, 2014 10:23 AM
To: Miller, Felicia@Energy
Subject: City of Huntington Beach Comments regarding FSA for HBEP

Please Docket

Dave and Eric,

I am forwarding comments from the Huntington Beach Fire Department (HBFD) on the conceptual landscape plan that was submitted to the Energy Commission in November 2013 (TN # 201142). *As noted in comments below under #4, it appears that changes were made to the applicant's overall fire access plan since publication of the conceptual landscape plan.* The HBFD recommends that the landscape plan be provided to the HBFD for review together with the applicant's Emergency Access Plan described under Condition of Certification **WORKER SAFETY-6**. Condition of Certification **VIS-2** requires preparation and submittal of a Perimeter Screening and On-site Landscape and Irrigation Plan that accurately shows all interior area constraints, including the emergency access roadway. **VIS-2** requires submittal of the plan to City staff for review and comment (including HBFD staff), at which time the HBFD will have the opportunity to review consistency of the plan with the HBFD's requirements for fire access.

VIS-2 requires submittal of the Perimeter Screening and On-site Landscape and Irrigation Plan at least 90 calendar days before site mobilization. **WORKER SAFETY-6** requires submittal of the Emergency Access Plan at least 60 days before the start of construction. These requirements are specified under the "verification" sections of the two conditions, and adjustments can be made to the timing of one or the other condition to allow concurrent review periods for the plans.

Staff prepared a conceptual drawing (attached) to show HBFD's requirements to avoid encroachments on the fire road (see #3 in the HBFD's comments below).

Thank you,
Jeanine

From: Morelli, Joe [<mailto:Joe.Morelli@surfcity-hb.org>]
Sent: Friday, August 08, 2014 1:40 AM
To: Hinde, Jeanine@Energy
Cc: James, Jane; Reardon, Bill
Subject: RE: City of Huntington Beach Comments Regarding FSA for HBEP

Hello Jeanine,

I reviewed the electronic plan page sent over earlier this week and the HBFD comments regarding the access are as follows:

1. The plans do not show the required reciprocal inter-tying loop fire access road and the fire access road to the south of Power Block 1 is also not depicted/called out on the plans (next to the 8' high security mason wall).
2. The LORS for fire department access are contained in City Specification #401 which requires a 26' wide fire road that is an inter-tying loop with two access points to the site. Although two access points are referenced as being provided (or required as indicated in the recent Final Staff Assessment submitted

to the city for comment), two access points are not shown on the plan provided for HBFD comment earlier this week.

3. Some of the 34 California Fan Palms are immediately adjacent to the fire access road. Fire Access roads in Huntington Beach are typically required to be kept clear to the sky to facilitate Fire Department Access. However, 1 1/2' on each side of the 26' wide fire road can have above encroachments that are maintained at 13 1/2' minimum.

4. Overall, since the November 2013 landscape plan was prepared (plan the above comments are based on which was provided to the HBFD earlier this week), it appears that there have been changes to the overall fire access proposed (i.e. such as in the Final Staff Assessment submitted to the city for comment in June 2014) and the HBFD recommends that the landscape plans provided for our comment are reviewed in conjunction with recently revised plans and comments from the California Energy Commission in the recent Final Staff Assessment. Some of the comments included in the Final Staff Assessment dated June 2, 2014 are copied below for reference.

Section 4.14-2 of the FSA dated 6/2/14 (beginning on page 758) reads as follows:

"Staff determined that the AFC was silent in one fire protection-related area, that which pertains to fire department access to the site. All power plants licensed by the Energy Commission are required to have more than one access point to the power plant site. This is sound fire safety procedure and allows for fire department vehicles and personnel to access the site should the main gate be blocked for any reason. However, it is not apparent from the proposed plot-plans that the project will provide two access points during operations and the AFC makes no mention of a secondary access point through the perimeter fence. A second access point is necessary to ensure fire department access and this access point can be restricted to emergency use only. Therefore, in order to ensure the adequate emergency access to the site by the fire department, staff proposes a Condition of Certification WORKER SAFETY-6 that would require the project owner to identify and provide a second access point to the site for emergency vehicles and to provide access roads with minimum 26 foot width, and with turns and corners having minimum inner and outer radii of 17 and 45 feet, respectively, to meet the requirements of the Huntington Beach Municipal Code and City Specification #401. The plan for the secondary access and access roads would be submitted to HBFD for review and comment, and to the CPM for review and approval."

Section 4.14-17 reads as follows:

"WORKER SAFETY-6 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. 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."

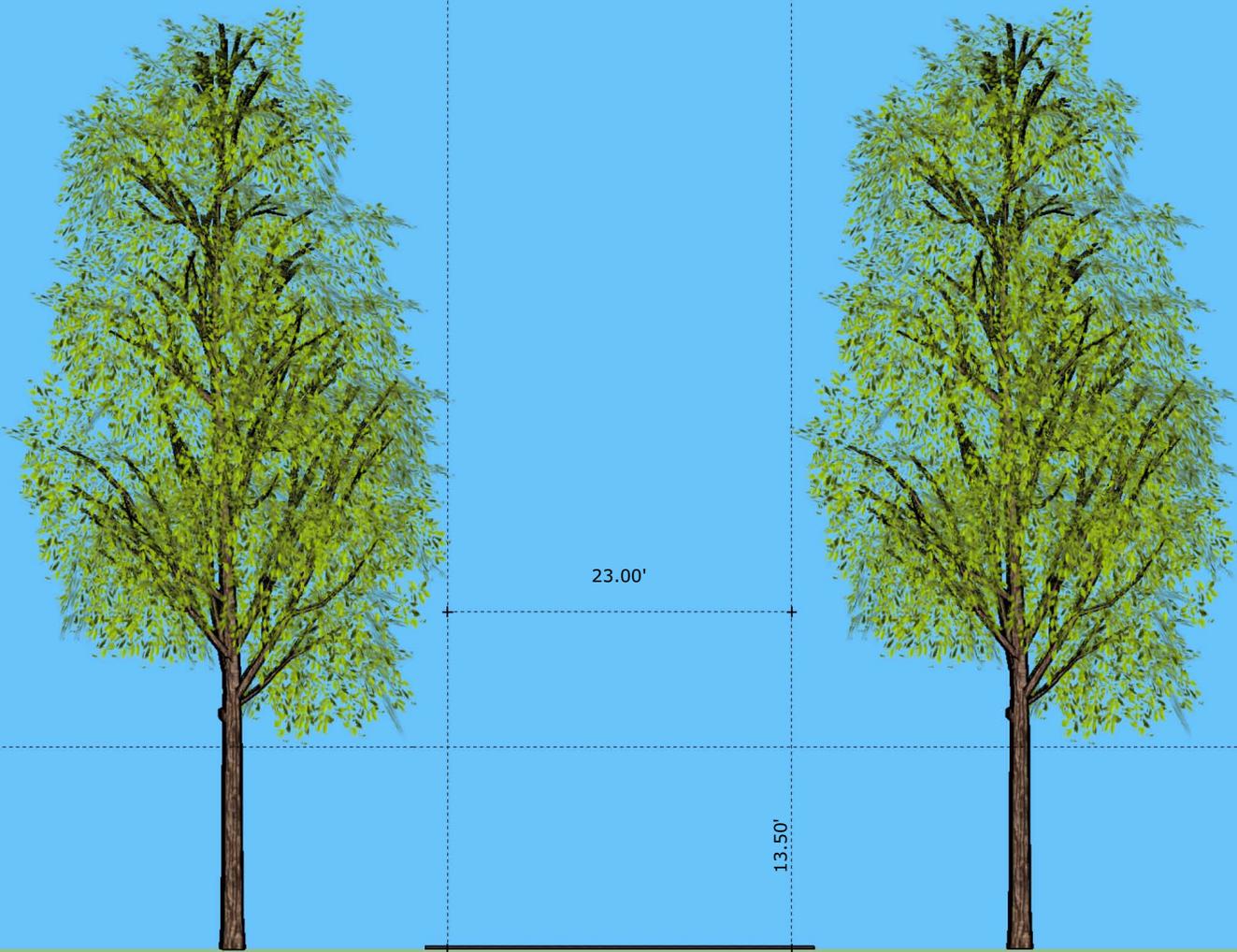
Thank you for allowing us the opportunity to comment on the November 2013 Landscape Plan.

If you have any questions or need any additional information from us, then please let us know.

Thank you,

Joe Morelli
Assistant Fire Marshal
City of Huntington Beach

Huntington Beach Energy Project - Conceptual Image of Fire Department Requirements for Landscape Plantings along the Fire Road



23.00'

13.50'

26.00'

Fire Access Road