



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

DOCKET

08-AFC-9

DATE Jul 27 2011

RECD. Aug 08 2011

July 27, 2011

Felicia Miller, Staff Project Manager
Before The Energy Resources Conservation
Commission of the State of California
1516 Ninth Street
Sacramento, CA 95814

Dear Ms. Miller:

REVISED NOTICE OF PRE-HEARING CONFERENCE AND EVIDENTIARY HEARING AND ORDER, DOCKET NO. 08-AFC-9, APPLICATION FOR CERTIFICATION FOR THE HYBRID POWER PROJECT, PALMDALE (FFER #201100008)

The Revised Notice of Pre-Hearing has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

We previously reviewed this project and provided the following comments which have not been incorporated into the Final Staff Assessment. Therefore, we reiterate the following comments:

WORKER SAFETY AND FIRE PROTECTION

SETTING

1. Paragraph 1 should be revised to state: "Fire protection and emergency medical services for the proposed project would be provided by Los Angeles County Fire Department (LACFD). Fire Station #129, located at 42110 6th Street in Lancaster, would be the jurisdictional station for the Palmdale Hybrid Power Plant (PHPP) with an estimated response time of five minutes. Fire Station #129 is staffed with a Hazardous Materials Task Force (one engine staffed with four personnel, and one Hazardous Materials Unit staffed with five personnel).

PROOF OF SERVICE (REVISED 7/22/11) FILED WITH ORIGINAL MAILED FROM SACRAMENTO ON 8/10/11

MS

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKESWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDORA	IRVINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

The next closest station to the PHPP is Fire Station #135, located at 1846 East Avenue K-4, Lancaster, approximately three miles away, with an estimated response time of ten minutes. Fire Station #135 is staffed with a three-person engine company and a two-person paramedic squad. The LACFD has five Fire Stations in the City of Palmdale and six in the City of Lancaster. In the event of a fire or incident at the proposed facility, the units responded to the incident would be based on distance and availability, without regard to jurisdictional or municipal boundaries."

2. The Worker Safety and Fire Protection Table 2 should be corrected as follows:

PFD Station	Response Time	Distance to PHPP	EMS Capability
Station 129	5 minutes	1.5 miles	Yes
Station 135	10 minutes	3.0 miles	Yes

LAND DEVELOPMENT UNIT:

1. The specific requirements for access and water systems will be addressed with the submittal of the site plan through either the Conditional Use Permit or Site Plan Review process. A minimum of four copies of the site plan shall be submitted to the Fire Department's Land Development for review. Also, include a copy of the elevations for each building (s)/structure(s), and a copy of the intended use of the site. The contact person for the Land Development Unit is Inspector Wally Collins, who can be reached at (323) 890-4243 or at wally.collins@fire.lacounty.gov
2. After the review by the Land Development Unit is completed, building construction plans and fire protection system plans shall be submitted to the Department's Lancaster Fire Prevention Office-Engineering Unit.
3. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic, and emergency response issues.
4. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
5. The development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
6. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.

- d. When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
- e. A cul-de-sac shall not be more than 500 feet in-length, when serving land zoned for commercial use.
7. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
8. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.
9. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. We have no comments at this time.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. Los Angeles County Certified Unified Program Agency (CUPA) is implemented by the Los Angeles County Fire Department, Health Hazardous Materials Division. The Final Staff Assessment for the Proposed PHPP (08-AFC-9) was reviewed by Michael Whitehead, Hazardous Materials Specialist III, who is assigned to the Health Hazardous Materials Division, on February 8, 2011. Mr. Whitehead focused his review on "Hazardous Materials Management" beginning on page 4.4-1 of 08-AFC-9, and submits the following comments for the Compliance Project Manager's (CPM) and the Energy Commission's review.
2. According to the Final Staff Assessment report, the hazardous materials needed for the PHPP are listed in Appendix B. The staff report acknowledges the need to comply with the California Health and Safety Code, Sections 25500 through 25543.4, the laws that relate to Hazardous Materials Business Plan and Inventory reporting, and to the California Accidental Release Prevention (CalARP) program. Mr. Whitehead offers the following specific comments related to the staff members' plans to comply with the Health and Safety Code:
 - a. Refer to Chapter 4.5, California Accidental Release Prevention, in Title 19 of the California Code of Regulations while preparing your risk management plan for the use of the regulated substance, >20% Aqueous Ammonia, for the air pollution control system. These regulations contain specific guidelines for the owner/operator to prepare the Risk Management Plan (RMP).

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- b. The unified program forms related to the hazardous materials business plan and inventory program are available on the Los Angeles County Fire Department's website located at www.lacounty.fire.gov
 - c. Submit the RMP and the unified program forms to the following address: Los Angeles County Fire Department Health Hazardous Materials Division 5825 Rickenbacker Rd. Commerce, CA 90040.
3. The Final Staff Assessment has a list of laws and regulations in a table titled "Hazardous Materials Management Table 1: Laws, Ordinances, Regulations, and Standards (LORS)." You may consider that the following sources related to the management of hazardous materials and the implementation of CalARP programs are useful LORS for this table:
 - a. California Health and Safety Code, Sections 25500 to 25520.
 - b. Title 19, California Code of Regulations, Sections 2735.1 to 2785.1.
 - c. Title 19, California Code of Regulations, Sections 2729 to 2732.
 - d. Title 12, Environmental Protection, Los Angeles County Code.
4. The Environmental Protection Agency and the California Emergency Management Agency have strict rules related to the reporting of releases of hazardous materials. The Final Staff Assessment should consider information about reporting releases of hazardous materials. There are two important government entities that need to be contacted:
 - a. The National Response Center has information about who to call on their website located at <http://www.nrc.uscg.mil/nrchp.html>
 - b. The California Emergency Management Agency has just updated their "California Hazardous Material Spill/Release Notification Guidance" in August 2010, and has made this document available at <http://www.oes.ca.gov/>.
5. Thank you for considering the comments of the Los Angeles County CUPA for the PHPP. If you have any questions, you may call Michael Whitehead, HMS III, at (323) 890-4109.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



JOHN R. TODD, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

JRT:lj



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION
For the *PALMDALE HYBRID
POWER PROJECT***

Docket No. 08-AFC-9

PROOF OF SERVICE

(Revised 7/22/2011)

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DECLARATION OF SERVICE

I, Maria Santourdjian, declare that on, August 10, 2011, I served and filed copies of the attached LA County Comments Letter on FSA for Palmdale Hybrid Power Project (08-AFC-9), dated July 27, 2011. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [<http://www.energy.ca.gov/sitingcases/palmdale/index.html>].

The document has been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

- sent electronically to all email addresses on the Proof of Service list, and
 by personal delivery; or
 by delivering on this date, for mailing with the United States Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

- delivering an original paper copy and sending one electronic copy by e-mail to the address below (*preferred method*);

OR

- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-9
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Originally Signed by _____
Maria Santourdjian