



COUNTY OF LOS ANGELES FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

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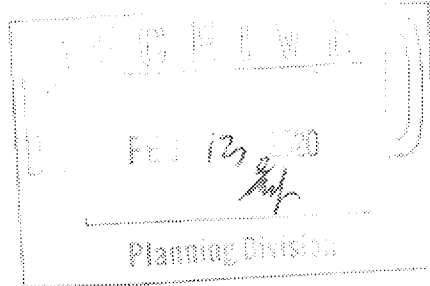
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FORESTER & FIRE WARDEN

February 7, 2020



Mindy Wilcox, Planning Manager
City of Inglewood
Planning Division
One West Manchester Boulevard
Inglewood, CA 90301

Dear Ms. Wilcox:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER," WOULD CONSIST OF AN APPROXIMATELY 915,000-SQUARE FOOT ARENA STRUCTURE DESIGNED TO HOST THE LA CLIPPERS BASKETBALL TEAM WITH UP TO 18,000 FIXED SEATS FOR NATIONAL BASKETBALL ASSOCIATION GAMES, THE ARENA COULD ALSO BE CONFIGURED WITH UP TO 500 ADDITIONAL TEMPORARY SEATS FOR EVENTS SUCH AS FAMILY SHOWS, CONCERTS, CONVENTIONS AND CORPORATE EVENTS, AND NON-LA CLIPPER SPORTING EVENTS, LOCATED AT 3812 WEST 102ND STREET, INGLEWOOD, FFER 202000026

The Notice of Availability of a Draft Environmental Impact Report 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:

3.13.4 Analysis, Impacts and Mitigation, Impacts and Mitigation Measures, Operations, paragraph 4, sentence 3, the statement "cumulative projects would generate revenue (e.g., developer fees, property and sales tax revenue) that could be used to offset LACFD expenditures", is incorrect, these revenues are not collected by LACFD and therefore would not offset any cost incurred by LACFD to provide additional staffing. The funding for the cost of the additional captain post position would have to be provided by the Developer.

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

- | | | | | | | |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
| AGOURA HILLS | CALABASAS | EL MONTE | INDUSTRY | LAWNDALE | PARAMOUNT | SIGNAL HILL |
| ARTESIA | CARSON | GARDENA | INGLEWOOD | LOMITA | RICO RIVERA | SOUTH EL MONTE |
| AZUSA | CERRITOS | GLENDORA | IRVINGDALE | LYNWOOD | POMONA | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | HAWAIIAN GARDENS | LA CANADA-FLINTRIDGE | MALIBU | RANCHO PALOS VERDES | TEMPLE CITY |
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| BELL GARDENS | COVINA | HERMOSA BEACH | LA MIRADA | NORWALK | ROLLING HILLS ESTATES | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HIDDEN HILLS | LA PUENTE | PALMDALE | ROSEMEAD | WESTLAKE VILLAGE |
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| | QUARTE | | LANCASTER | | SANTA CLARITA | |

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. The County of Los Angeles Fire Department Land Development Unit's comments are general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants.
3. Where Fire Apparatus Access roads or a water supply for fire protection are required to be installed, such protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection where construction of new roadways allows passage by vehicles in accordance with section 205.2.
4. Approved Fire Apparatus Access Roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirement of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the buildings as measured by an approved route around the exterior of the building or facility.
5. Fire Apparatus Access Roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.8 [California Code of Regulations, Title 19, Division 1, §3.05(a)] Fire Department Access and Egress. (Roads) (a)Roads. Required access roads from every building to a public street shall be all-weather hard-surfaced (suitable for use by fire apparatus) right-of-way not less than 20 feet in width. Such right-of-way shall be unobstructed and maintained only as access to the public street.
6. The dimensions of approved fire apparatus roads shall be maintained as originally approved by the fire code official.
7. 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.
8. Fire Apparatus Access Roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all weather driving capabilities.

9. 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.
10. Dead end Fire Apparatus Access Roads in excess of 150 feet (47 750 mm) in-length shall be provided with an approved area for turning around fire apparatus.
11. The area of firefighting operations shall not be located underneath high-voltage transmission lines.
12. Where required by the fire code official approved signs, other approved notices, or markings that include the words NO PARKING-FIRE LANE shall be provided for Fire Apparatus Access Roads to identify such roads, to clearly indicate the entrance to such road or prohibit the obstruction thereof. The means by which fire lanes are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility. A non-parking designation shall meet the requirements of California Vehicle Code Section 22500.1 and be approved by the fire code official.
13. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Sections 503.2.1 and 503.2.2 shall be maintained at all times.
14. Traffic calming devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.
15. The fire code official is authorized to require the installation and maintenance of gates, or other approved barricades across Fire Apparatus Access Roads, trails or other access ways, not including public streets, alleys or highways. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.
16. The installation of security gates across a Fire Apparatus Access Road shall be approved by the fire chief. Where security gates are installed they shall have an approved means of emergency operation. The security gates and the emergency operation shall be maintained operational at all times. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed. Constructed and installed to comply with the requirements of ASTM F2200.
17. Exterior doors and openings required by this code or the California Building Code shall be maintained readily accessible for emergency access by the fire department. An approved access walkway leading from Fire Apparatus Access Roads to exterior openings shall be provided when required by the fire code official. [California Code of

Regulations, Title 19, Division 1, §3.05(b)] Fire Department Access and Egress (Roofs) (b) Roofs. No person shall install or maintain any security barrier such as barbed wire fencing, razor wire fencing, chain link fencing, or any other fencing material cable aerial, antenna, or other obstruction on the roof of any commercial establishment in such a manner as to obstruct or render egress or access hazardous in the event of fire or other emergency.

18. New buildings four or more stories above grade plane, except those with a roof slope greater than four units vertical in 12 units horizontal shall be provided with a stairway to the roof. Stairway access to the roof shall be in accordance with Section 1011.12. Such stairway shall be marked at street and floor levels with a sign indicating that the stairway continues to the roof. Where roofs are used for roof gardens or for other purposes, stairways shall be provided as required for such occupancy classification.
19. No person shall install any security barrier, visual barrier screen, or other obstruction on the roof of any building in such a manner as to obstruct firefighter ingress or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches on at least two sides of the building.
20. New and existing buildings shall be provided with approved address identification. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with their background. Address numbers shall be Arabic numbers or alphabetical letters. Numbers shall not be spelled out. Each character shall be not less than 4 inches high with a minimum stroke width of 1/2 inch. Where required by the fire code official, address identification shall be provided in additional approved locations to facilitate emergency response. Where access is by means of a private road and the building cannot be viewed from the public way, a monument pole or other sign or means shall be used to identify the structure. Address identification shall be maintained.
21. Streets and roads shall be identified with approved signs. Temporary signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles. Signs shall be of an approved size, weather resistant, and be maintained until replaced by permanent signs.
22. Multiple residential and commercial units having entrance doors not visible from the street or road shall have, in addition to the requirements of Section 505.1 above, approved numbers grouped for all units within each structure and positioned to be plainly visible from the street or road. Said numbers may be grouped on the wall of the structure or on a mounting post independent of the structure.
23. Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life saving or firefighting purposes, the fire code official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with

UL 1037, and shall contain keys to gain necessary access as required by the fire code official.

24. An approved lock shall be installed on gates or similar barriers where required by the fire code official.
25. Key boxes provided for no standardized fire service elevator keys shall comply with Section 506.1 and all of the following:
 - a. The key box shall be compatible with an existing rapid entry key box system in use in the jurisdiction and approved by the fire code official.
 - b. The front cover shall be permanently labeled with the words "Fire Department Use Only-Elevator Keys"
 - c. The key box shall be mounted at each elevator bank at the lobby nearest to the lowest level of fire department access.
 - d. The key box shall be mounted 5 feet 6 inches above the finished floor to the right side of the elevator bank.
 - e. Contents of the key box are limited to fire service elevator keys. Additional elevator access tools, keys, and information pertinent to emergency planning or elevator access shall be permitted where authorized by the fire code official.
 - f. In buildings with two or more elevator banks a single key box shall be permitted to be used where such elevator banks are separated by not more than 30 feet. Additional key boxes shall be provided for each individual elevator or elevator bank separated by more than 30 feet.
26. An approved water supply capable of supplying the required fire flow for fire protection shall be provided to premises upon which facilities, buildings, or portions of buildings are hereafter constructed or moved into or within the jurisdiction.
27. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method or Appendix B, County of Los Angeles Fire Code.
28. Fire hydrant systems shall comply with Sections 507.5.1 through 507.5.6 and Appendix C or by an approved method.
29. Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more than 400 feet (122 m) from a hydrant on a Fire Apparatus Access Road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains shall be provided where required by the fire code official.

30. Unobstructed access to fire hydrants shall be maintained at all times. The fire department shall not be deterred or hindered from gaining immediate access to fire protection equipment or fire hydrants.
31. When required by the fire code official, a fire hydrant, and other firefighting water source shall be identified by the installation of a blue raised reflective pavement marker or identified by other approved means. The minimum fire-flow and flow duration for buildings other than one- and two-family dwellings, and Group R-3 buildings shall be as specified in Tables B105.2 and B105.1(2).
32. The minimum number of fire hydrants available to a building, complex or subdivision shall not be less than that determined by the spacing requirements in Section C105 and Section C106 when applied to Fire Apparatus Access Roads and perimeter public streets from which fire operations could be conducted.
33. For all occupancies other than one- and two-family dwellings, and Group R-3 buildings, including commercial, industrial, multi-family dwellings, private schools, and institutions, fire hydrant spacing shall be 300 feet (91.44 m). No portion of lot frontage shall be more than 200 feet (60.96 m) from, via vehicular access, a public hydrant. No portion of a building shall be more than 400 feet (121.92 m) from, via vehicular access, a properly spaced public hydrant.
34. Facilities, buildings, or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved Fire Apparatus Access Road with an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus weighing at least 75,000 pounds (34 050 kg).
35. Dead-end Fire Apparatus Access Roads in excess of 150 feet (45,720 mm) shall be provided with an approved turnaround. See Figure D103.6(1) and (2). The turnaround shall be oriented on the access roadway in the proper direction of travel.
36. Gates securing the Fire Apparatus Access Roads shall comply with all the following criteria:
 - a. Where a single-gate is provided, the gate width shall be not less than 20 feet (6096 mm). Where a fire apparatus road consists of a divided roadway, the gate width shall be not less than 15 feet (4572 mm) for residential use and 20 feet (6096 mm) for commercial/industrial uses.
 - b. Gates shall be of the swinging or sliding type.
 - c. Construction of gates shall be of materials that allow manual operation by one person.
 - d. Gate components shall be maintained in an operative condition at all times and replaced or repaired when defective.

- e. Electric gates shall be equipped with a means of opening the gate by Fire Department personnel for emergency access. Emergency opening devices shall be approved by the fire code official.
 - f. Methods of locking shall be submitted for approval by the fire code official.
 - g. Electric gate operators, where provided, shall be listed in accordance with UL 325.
 - h. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.
37. Where required by the fire code official, Fire Apparatus Access Roads shall be marked with permanent "NO PARKING - FIRE LANE" signs complying with Section 22500.1 of the California Vehicle Code. Signs shall have a minimum dimension of 12 inches (305 mm) wide by 18 inches (457 mm) high and have red letters on a white reflective background. Signs shall be posted on one or both sides of the fire apparatus road as required.
38. Where the vertical distance between the access roadway and the highest roof surface exceeds 30 feet (9144 mm), approved aerial fire apparatus access roads shall be provided. For purposes of this section, the highest roof surface shall be determined by measurement to the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater.
39. Aerial Fire Apparatus Access Roads shall have a minimum unobstructed width of 28 feet (8535 mm), exclusive of shoulders, in the immediate vicinity of the building or portion thereof.
40. At least one of the required access routes meeting this condition shall be located within a minimum of 15 feet (4572 mm) and a maximum of 30 feet (9144 mm) from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.
41. Overhead utility and power lines shall not be located over the aerial Fire Apparatus Access Road or between the aerial fire apparatus road and the building. Other obstructions shall be permitted to be placed with the approval of the fire code official.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department - Land Development Unit, Inspector Nancy Rodeheffer at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site. The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

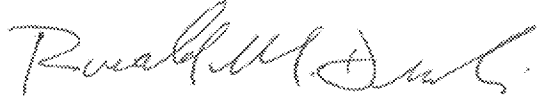
The Site Mitigation Unit (SMU) is within the Health Hazardous Materials Division of the Los Angeles County Fire Department. SMU does not direct nor issue permits for environmental cleanups; SMU oversees environmental cleanups for the protection of the environment and manages associated potential human health risks and hazards. If SMU were to oversee environmental site assessment, remediation, and mitigation measures at the project site, the applicant would have to enter into a "Remedial Action Agreement" with SMU per California Health and Safety Code (HSC) Section 101480(c). However, SMU is currently understaffed and is not able to oversee the project at this time due to previous commitments. Therefore, the Cal-EPA Department of Toxic Substances Control or the Los Angeles Regional Water Quality Control will have to be pursued for environmental oversight of the project site.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

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

Mindy Wilcox, Planning Manager
February 7, 2020
Page 9

Very truly yours,

A handwritten signature in black ink, appearing to read "Ronald M. Durbin". The signature is fluid and cursive, with the first name "Ronald" being the most prominent.

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac