October 25, 2018

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

Dear Ms. Wilcox:

REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER," WOULD CONSIST OF AN ARENA DESIGNED TO HOST THE LA CLIPPERS BASKETBALL ASSOCIATION GAMES, IT WOULD ALSO HOST EVENTS SUCH AS FAMILY SHOWS, CONCERTS, CONVENTIONS, AND CORPORATE EVENTS, INGLEWOOD, FFER 201800109

The Revised Notice of Preparation 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:

1. Based on information on the LACFD website, the nearest LACFD fire stations located within approximately one (1) mile of the Project Site include Fire Station 170 located at 10701 S. Crenshaw Boulevard, Inglewood; Fire Station 18 located at 4518 W. Lennox Boulevard, Inglewood; and Fire Station 173 located 9001 S. Crenshaw Boulevard, Inglewood. Please Confirm.

The above three fire stations, Fire Station 170, Fire Station 18 and Fire Station 173 are located within approximately 1.5 miles of the Project Site.
Additionally, Fire Stations 162, 171, 161, 14, 95, and 172 are all located within approximately 2.5 miles of the Project Site. Please confirm.

Fire Stations 162, 171, 161 and 172 are located within approximately 2.5 miles of the Project Site. Fire Stations 14 and 95 are both located over 3 miles from the Project Site.

Which LACFD fire station would provide primary service to the Project Site? Which LACFD fire station(s) would provide back-up services?

Fire Station 170 is the jurisdictional station for the Project Site. Fire Station 18 would be the 2nd-due station and Fire Station 173 would be the 3rd-due.

2. Please provide the following information for each LACFD fire station serving the Project Site (LACFD fire stations assumed to be Fire Stations 170, 18, and 173):

a. Existing fire station service boundaries and service area population, if known. If applicable, please note any anticipated future changes;

The Los Angeles County Fire Department operates under a regional concept in its approach to providing fire protection and emergency medical services, wherein emergency response units are dispatched as needed to an incident anywhere in the District’s service territory based on distance and availability without regard to jurisdictional or municipal boundaries.

b. Equipment and staffing for existing stations (e.g., number of engines, trucks, squads, total full-time and part-time staff, firefighters on 24-hour duty, paramedic staff and services, etc.).

Fire Station 170 is staffed daily with a 4-person assessment quint, which is a combination engine/ladder truck apparatus with some limited paramedic capabilities (1-Captain, 1-Fire Fighter Specialist, 1-Fire Fighter Paramedic and 1-Fire Fighter) and a 2-person engine (1-Fire Fighter Specialist and 1-Fire Fighter). These 2 units form an Assessment Light Force and respond in tandem.

Fire Station 18 is staffed with a 4-person paramedic engine company (1-Captain, 1-Fire Fighter Specialist and 2-Fire Fighter Paramedics), for each 24-hour shift.

Fire Station 173 is staffed with a 3-person engine company (1-Captain, 1-Fire Fighter Specialist and 1-Fire Fighter Paramedic) and a 2-person paramedic squad (2-Fire Fighter Paramedics) for each 24-hour shift.

c. Most recent data on associated response times for each fire station/facility serving the Project Area and the overall LACFD, if known.

Not available at this time.
d. Most recent data on yearly emergency incidents for each fire station/facility serving the Project Area and overall LACFD, if known.

Not available at this time.

3. Please provide any applicable information regarding impediments to emergency response near the Project Area, including whether there has been a history of bottlenecks during fire emergencies.

Not available at this time.

4. Please describe any planned changes to fire staffing and operations to serve anticipated future development in the Project Area. Also, describe any planned improvements to the fire protection facilities in the service area of the Project Site (i.e., new or expanded facilities, new equipment, additional staffing, etc.).

Currently the LACFD has no planned improvements in the immediate area of the Project Area/Site; however, a development of this scale will significantly impact service demands on the existing resources.

5. Beyond any planned improvements or changes in operations discussed under Response 4, would Project implementation require the physical expansion of an existing fire station(s), a new fire station, and/or additional staffing to the fire protection facilities servicing the Project Site?

The City or the event promoters would be required to reimburse the cost to provide augmented fire safety staffing at the LACFD's discretion at events to be held at the subject property on an ad hoc basis.

6. What would be the anticipated LACFD response time for fire incidents at the Project Site with and without the Proposed Project? What would be the response time goal to the Project Site with the Project? Please provide any relevant information regarding response time goals as applicable to the Proposed Project or otherwise.

Based on the distance to the project site, Fire Station 170 is estimated to have an emergency response time of 5:00 minutes. The LACFD uses national guidelines of a 5-minute response time for the 1st-arriving unit for fire and EMS responses and 8 minutes for the advanced life support (paramedic) unit in urban areas.

7. Please provide a general overview of the LACFD's emergency response system (i.e., emergency response plans, standard operation protocols and procedures, new technology or programs underway to improve response times, etc.).

Calls received by the dispatch center are dispatched to the jurisdictional engine company for the incident location. If the jurisdictional engine company is not available, the next closest available unit will handle. Depending on the incident type, several units may be dispatched to an incident in accordance with the level of service required based on the incident type. For instance, an EMS incident will require the nearest
available basic life support unit (an engine), the nearest advance life support unit (a paramedic squad) and an ambulance.

8. The Proposed Project would be no more than 150 feet tall. Please describe relevant fire flow requirements for the proposed buildings of this design, height, and location.

To be answered by Land Development Division.

9. Any Project-specific fire access during Project construction of Project operation (including site ingress/egress, minimum turning radii, driveway width, grading, etc.) information or concerns.

To be answered by Land Development Division.

10. Any other design features, special fire protection devices or equipment (e.g., sprinklers, alarms), fire hydrants and spacing, or mitigation required due to the height, location, users or other attributes of the Proposed Project.

To be answered by Land Development Division.

LAND DEVELOPMENT UNIT:

1. The statutory responsibilities of the County of Los Angeles Fire Department’s Land Development Unit are the review of, and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities located within non-contract cities. The County of Los Angeles Fire Department’s Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division which may create a potentially significant impact to the environment.

2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

3. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.

4. 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.
5. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

6. When a bridge is required to be used as part of a fire access road it shall be constructed and maintained in accordance with nationally recognized standards and designed for a live load sufficient to carry a minimum of 75,000 pounds. All water crossing designs are required to be approved by the public works department prior to installation.

7. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

8. The development may require fire flows up to 8,000 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. County of Los Angeles Fire Code, Appendix B, shall be utilized to determine the required for all proposed structures within the proposed development. Provide on the site plan or project data sheet the construction type and square footage per structure (not per product type) for each structure within the proposed development.

9. 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.

10. 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.

11. Structures greater than 30 feet in height: Provide a minimum unobstructed width of 28 feet exclusive of shoulders except for approved security gates in accordance with
Section 503.6 County of Los Angeles Fire Code, and an unobstructed vertical clearance "clear o sky" Fire Department vehicular access to within 150 feet of 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 when the height of the building above the lowest level of the Fire Department vehicular access road is more than 30 feet high or the building is more than three stories.

12. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet 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. County of Los Angeles Fire Code 503.1.1 and 503.2.2. Cross hatch the Fire Department vehicular access on the site plan and clearly depict the required width. Proximity to building. At least one of the required access routes meeting this condition shall be located within a minimum of 15 feet (4572mm) and a maximum of 30 feet (9144mm) 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. County of Los Angeles Fire Code Appendix D, Section D105.3.

13. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
   
   a) Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.

   b) Provide 42 feet in-width when parallel parking is allowed on each side of the access roadway/driveway.

   c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans.

   d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

14. All access devices and gates shall meet the following requirements:

   a) Any single-gated opening used for ingress and egress shall be a minimum of 26 feet in-width clear-to-sky.

   b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.

   c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum
of 32 feet of turning radius. If an intercom system is used the 50 feet shall be measured from the right-of-way to the intercom control device.

d) All limited access devices shall be of a type approved by the Fire Department.

e) Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.

15. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.

16. Provide three sets of alternate route (detour) plans, with a tentative schedule of planned closures, prior to the beginning of construction. Complete architectural/structural plans are not necessary.

17. Notify the County of Los Angeles Fire Department’s Battalion Headquarters Fire Station 171, (310) 419-2160 at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.

18. Temporary bridges shall be designed, constructed, and maintained to support a live load of at least 70,000 pounds. A minimum vertical clearance of 13' 6" will be required throughout construction.

19. 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.

20. This project may require the installation of additional public fire hydrants and private on-site fire hydrants. Actual fire hydrant locations shall be determined upon submittal to the County of Los Angeles Fire Department’s Fire Prevention, Land Development Unit, and/or the County of Los Angeles Fire Department Fire Prevention Engineering Section Building Plan Check Unit.

21. Submit three sets of water plans for changes to the existing public water system for fire protection purposes to the County of Los Angeles Fire Department’s Land Development Unit for the review. The plans must show all proposed changes to the fire protection water system such as fire hydrant locations and main sizes. The plans shall be submitted through the local water company.

The County of Los Angeles Fire Department’s 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’s Inspector Nancy Rodeheffer at (323) 890-4243.
FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, 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.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments regarding the Lead Agency’s “Request for Information” letter, dated August 30, 2018, pertaining to the project site.

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

Very truly yours,

MICHAEL Y. TAKEHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac