June 12, 2013

Richard Mollica, Associate Planner
Planning Department
City of Malibu
23825 Stuart Ranch Road
Malibu, CA 90265

Dear Mr. Mollica:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, NOTICE OF PLANNING COMMISSION PUBLIC HEARING, EIR NO. 11-002, STATE CLEARINGHOUSE NO 2011051027, FOR THE 2008-2014 UPDATE OF THE GENERAL PLAN HOUSING ELEMENT WHICH ESTABLISHES SPECIFIC GOALS, POLICIES AND OBJECTIVES RELATIVE TO THE PROVISION OF HOUSING, AND THE CONSTRUCTION OF MULTI-FAMILY RESIDENTIAL DEVELOPMENT, MALIBU (FFER #201300075)

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:

4.12 PUBLIC SERVICES

4.12.1 Setting

Paragraph 1, should be corrected as follows:

a. Fire Protection. The Los Angeles County Fire Department (LACFD) provides fire protection service in Malibu. Currently, four stations (Nos. 70, 71, 88 and 99) directly serve the City; however, all LACFD resources are available to serve the City. LAFCD operations are divided into nine operational Divisions, which are composed of 22 Battalions serving unincorporated area of Los Angeles County and 57 cities, including the City of Malibu. Candidate sites #1, #2, and #7 are all

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:
located within Battalion #5 (LACFD, 2012). In the event of a major fire, additional equipment is kept in reserve at most of the stations to be used by off-duty fire fighters (LACFD, 2012).

Paragraph 3, should be corrected as follows:

Candidate Sites #1 and #2. Candidate sites #1 and #2 would be served by LACFD Fire Station 71. Fire Station 71 is located at 28722 West Pacific Coast Highway, in the City of Malibu, and is approximately 0.30 miles southwest of Candidate Site #1 and 0.35 miles southwest of Candidate Site #2. Fire Station 71 has three firefighters on duty at all times, and equipment includes one Fire Engine and one Paramedic Ambulance (City of Malibu General Plan, Chapter 4, Section 4.3 Public Services, 1991). is staffed with a 3-person engine company (consisting of 1-Fire Captain, 1-Fire Fighter Specialist and 1-Fire Fighter Paramedic) and a 2-person paramedic squad (consisting of 2-Fire Fighter Paramedics). According to the LACFD, the average response time to candidate sites #1 and #2 would be approximately one minute (Buck, Lorraine, Personal Communication April 17, 2012).

Paragraph 4, should be corrected as follows:

Candidate Site #7. According to the LACFD, Fire Station 88 would be the primary station serving Candidate Site #7 (Bloom, David, Personal Communication April 2012). Fire Station 88 is located at 23720 West Malibu Road, in Malibu, and is approximately 0.5 miles southwest of Candidate Site #7. Fire Station 88 has three firefighters on duty at all times, and equipment includes one Telesquirt1 and one Paramedic Ambulance (City of Malibu General Plan, Section 4.3 – Public Services, 1991). is staffed with a 3-person engine company (consisting of 1-Fire Captain, 1-Fire Fighter Specialist and 1-Fire Fighter Paramedic) and a 2-person paramedic squad (consisting of 2-Fire Fighter Paramedics). According to LACFD, the response time to Candidate Site #7 would be approximately 1.7 minutes (Buck, Lorraine, Personal Communication April 17, 2012).

LAND DEVELOPMENT UNIT:

1. The statutory responsibilities of the County of Los Angeles Fire Department, 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, 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. This property is located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, must be met.

4. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic, and emergency response issues.

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. Access roads shall be maintained with a minimum of 10 feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky with the exception of protected tree species. Protected tree species overhanging fire access roads shall be maintained to provide a vertical clearance of 13 feet 6 inches.

7. 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.

8. The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade. In such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, shall be no more than 17%. Grade breaks shall not exceed 10% in ten feet.

9. 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.

10. 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.

11. HIGH DENSITY RESIDENTIAL: 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 the buildings, their relationship to other structures, property lines, and types of construction used.

12. HIGH DENSITY RESIDENTIAL: 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 fire hydrant.

c) When cul-de-sac depth exceeds 200 feet, hydrants will be required at the corner and mid-block.

d) Additional hydrants will be required if the hydrant spacing exceeds specified distances.

13. HIGH DENSITY RESIDENTIAL: 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.

14. HIGH DENSITY RESIDENTIAL: All on-site driveways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The 28 foot width does not allow for parking, and shall be designated as a "Fire Lane" and have appropriate signage. The centerline of the on-site driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building.

15. HIGH DENSITY RESIDENTIAL: The 28 feet in width shall be increased to:

a) 34 feet in width when parallel parking is allowed on one side of the access way.

b) 36 feet in width when parallel parking is allowed on both sides of the access way.

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.

16. HIGH DENSITY RESIDENTIAL: When serving land zoned for residential uses having a density of more than four units per net acre:

a) A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length.

b) The length of the cul-de-sac may be increased to 1,000 feet if a minimum of 36 feet in width is provided.

c) A Fire Department approved turning area shall be provided at the end of a cul-de-sac.

17. SINGLE FAMILY DWELLINGS: Single family detached homes shall require a minimum fire flow of 1,250 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. Two family dwelling units (duplexes) shall require a fire flow of 1,500 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. When there
are five or more units taking access on a single driveway, the minimum fire flow shall be increased to 1,500 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. For structures that exceed 3,600 square feet the fire flow shall be in accordance with Appendix B, Table B105.1 of the 2011 County of Los Angeles Fire Code.

18. SINGLE FAMILY DWELLINGS: Fire hydrant spacing shall be 600 feet and shall meet the following requirements:
   a) No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.
   b) No portion of a structure should be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant.
   c) When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.
   d) Additional hydrants will be required if hydrant spacing exceeds specified distances.

19. SINGLE FAMILY DWELLINGS: 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.

20. SINGLE FAMILY DWELLINGS: Fire Department access shall provide a minimum unobstructed width of 28 feet, clear-to-sky and be within 150 feet of all portions of the exterior walls of the first story of any single unit. If exceeding 150 feet, provide 20 feet minimum paved width “Private Driveway/Fire Lane” clear-to-sky to within 150 feet of all portions of the exterior walls of the unit. Fire Lanes serving three or more units shall be increased to 26 feet.

21. SINGLE FAMILY DWELLINGS: Streets or driveways within the development shall be provided with the following:
   a) Provide 36 feet in width on all streets where parking is allowed on both sides.
   b) Provide 34 feet in width on cul-de-sacs up to 700 feet in length. This allows parking on both sides of the street.
   c) Provide 36 feet in width on cul-de-sacs from 701 to 1,000 feet in length. This allows parking on both sides of the street.
   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. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road.

22. 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.

23. 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.

24. Notify the County of Los Angeles Fire Department, Fire Stations 71, (310) 457-2578, and Fire Station 88, (310) 456-2812, at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.

25. 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.

26. Submit three sets of water plans to the County of Los Angeles Fire Department, Land Development Unit. 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.

27. The County of Los Angeles Fire Department, Land Development Unit's comments are only 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.

28. 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 or nrodeheffer@fire.lacounty.gov.

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

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. 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.

2. A fuel management/modification and fire hazard reduction plan should be developed and implemented prior to construction.

3. Landscape design and construction should consider utilizing low fuel volume and drought tolerant species.

4. Due to the wildland fire hazard surrounding the project we do not recommend using highly flammable and heavy fuel volume Eucalyptus, Pines, Junipers or Cypress plant species.

5. In order to limit the threat of wildfire, the use of native/low fuel volume plants should be mandatory in the landscape plan for this project.

6. This property is located within the area described by the Forester and Fire Warden as a Very High Fire Hazard Severity Zone or Fire Zone 4. The development of this project must comply with all Very High Fire Hazard Severity Zone code and ordinance requirements for fuel modification.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project. However, it should be noted that any property with historical use and/or storage of hazardous materials including agricultural use must be assessed and if required mitigated under oversight of the Department of Toxic Substances Control or the Los Angeles County Fire Department prior to grading and construction activities.

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

Very truly yours,

FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION PREVENTION SERVICES BUREAU

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