



San Ramon Valley Fire Protection District

1500 Bollinger Canyon Road, San Ramon, CA 94583

Phone (925) 838-6600 | Fax (925) 838-6629

www.firedepartment.org | info@firedepartment.org

August 25, 2014

Board of Forestry and Fire Protection

Attn: Edith Hanningan

Board Consultant, SRA

P.O. Box 944246

Sacramento, CA94244-2460

Ms. Hanningan,

The following comments are in response to the Notice of Proposed Rule Making for the package described as; "SRA Fire Safe Regulations Update, 2014"

It is my recommendation that there is more direct dialogue with affected stakeholders. The SRA regulations are focused in that they are applicable in unincorporated areas within the state and therefore the stakeholder group from a regulatory perspective is somewhat defined. There should be an effort to reach out to each county and include all impacted agencies (planning, building, public works, fire, etc.) to provide input as well as affected state organizations.

There has been no analysis of the increase in cost that I am aware of. The rulemaking package indicates that there is no significant increase to housing costs however; nearly every modification is increasing the minimum standard and inclusive of high construction costs.

Additionally, I believe the process for certifying local ordinances that provide the same practical effect should be revisited to provide a more comprehensive approach to land-use development and public safety.

The following comments are respectfully submitted.

Article 2. Emergency Access

Adding the language- and Egress, goes beyond the scope of PRC 4290.

There is no definition or language for determining what is emergency access. Particularly on driveways I believe this is an issue. As written, based on my interpretation, all driveways would be required to be engineered to support 75,000 pounds regardless of their length.

1273.01 Road Width.

The modification from 18ft to 20ft would increase cost and would create a more restrictive minimum standard.

1273.02 Roadway Surface

The increase in imposed load from 40,000 to 75,000 will increase cost and would create a more restrictive minimum standard.

All-weather surface is not defined.

1273.05 Roadway Turnarounds

The proposed language is unclear in prescribing prescriptive requirements.

Although unclear as to the extent, it appears that it would increase the cost.

1273.08 One-Way Roads

The modification from 10 ft to 12 ft would increase the cost.

1273.10 Driveways

The requirement for 14 ft unobstructed horizontal clearance essentially imposes 2ft setbacks along the road imposing more restrictive requirements for land-use. Language is unclear. Can you have clearance of 1ft on one side and 3 ft on the other side? There is no reasoning or justification for the modification.

1273.11 Gate Entrance

Increasing the minimum width to 14ft would increase the cost of the gate installation.

1274.01 and 1274.09 Size of Letters

The Office of the State Fire Marshal adopts Section 505 of California Building Standards Code, Title 24, Part 9- Premises Identification.

By this action, premises identification has been deemed a building standard, PRC 4290 states that the Board will not adopt building standards, as defined in Section 18909.

1275.00 Intent

By striking the allowance for a fire agency mobile water tender to satisfy the intent, the modification to existing language will increase the cost.

1275.01 Application

The modification to include the requirement in the tentative and parcel map process should be reviewed by the each County Board of Supervisors for impacts of enforcing conditions of approval through the land-use permit.

1275.10

The reference of the NFPA standard 1142 has been determined to be a building standard by the adoption of the standard in the California Building Standards Code, Title 24, Part 9.

Although I believe the intent is to describe the requirement for the purpose of structure defense the NFPA 1142 document scope is described below and clearly states that the scope of the standard is for structural fire-fighting;

1.1 Scope. 1.1.1 This standard identifies a method of determining the minimum requirements for alternative water supplies for structural fire-fighting purposes in areas where the authority having jurisdiction determines that adequate and reliable water supply systems for fire-fighting purposes do not otherwise exist. 1.1.2 An adequate and reliable municipal-type water supply is one that is sufficient every day of the year to control and extinguish anticipated fires in the municipality, particular building, or building group served by the water supply.

Furthermore, the requirement states that the article does not prohibit the combined storage of emergency wildfire and structural firefighting water supplies indicating that the provisions in Title 14 and the fire flow requirements for structural firefighting are both required.

This would increase the cost, and in my opinion, it is not necessary to have both water supplies. Furthermore, local jurisdictions maintain the responsibility for determining fire-flow for buildings and facilities. In addition, I am not sure that it takes into consideration provisions for accessory type structures.

Additional thoughts;

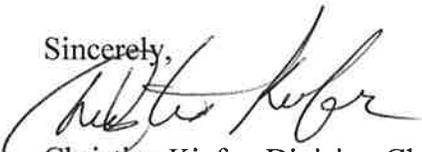
Related to the application of PRC 4290 I believe there needs to be a very clear understanding among community development stakeholders and Cal Fire personnel of where and when Title 14 provisions are applicable based on the legal authority of PRC 4290.

There should be exceptions for development projects that will increase the density to be out of compliance with SRA and reclassified as LRA.

There should also be exceptions for development that has municipal agreements for incorporation.

I apologize for being unable to attend the public hearing. Please feel free to call me if you have any questions regarding my comments.

Sincerely,



Christina Kiefer, Division Chief