

For December 7th Hearing
Submitted by CalFire, SCU

Email Response from Chief Good, per my request for comment (email forwarded from Robert Cain with Appeal and Staff Report attached dated November 29, 2021/sent on December 2, 2021)
Comments on PLN-188580

Chief Estrada –

Thanks for sharing these documents – this was our first opportunity to review.

To frame the issue:

CAL FIRE is legally obligated to review new development proposals in the SRA for compliance with the basic wildfire protection standards of the California Board of Forestry and Fire Protection known as the Fire Safe Regulations.

CAL FIRE unable to grant an exception to the Fire Safe Regulations where no exception is codified. We defer to the local jurisdiction for a determination on such requests.

Regarding PLN18-8580:

Please refer to Attachment C for our response to the AMM request. In our opinion, the design professional failed to demonstrate *same practical effect*.

The proposed AMM (additional water, hydrants, and increased sprinkler density) does not mitigate the problems of inadequate egress capacity or the threat of an approaching wildfire, and is of questionable value in situations where emergency access is also inadequate. These features provide the occupants with no protection during an evacuation. Further, these features require inspection, testing, and maintenance, cycles that are unfamiliar to residential homeowners, and unenforceable under current Code.

I'll be happy to discuss this further if necessary,

[Dwight Good](#)

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