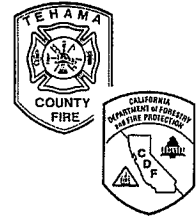


TEHAMA COUNTY COOPERATIVE FIRE PROTECTION

Office of Gary Durden, Fire Chief

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January 2, 2007

Mr. George Robson, Planning Director
Tehama County Planning Department
444 Oak Street, Room I, Courthouse Annex
Red Bluff, CA 96080

Re: General Plan Administrative Draft Comments

Dear Mr. Robson,

Thank you for the opportunity to respond to the Administrative Draft of the Tehama County General Plan (ADGP).

After review of the Tehama County ADGP, the Tehama County Fire Department requests the following changes:

1. Page 3-2 - Add the following paragraph after the first paragraph:

Access is a major fire protection need, whether wildland or structural. Failure to provide access for emergency equipment and concurrent evacuation egress for civilians can result in major loss of life, property and natural resources. Safe access requires street and road networks that limit dead-end roads and provide reasonable widths, grades, surfaces, and curves for all vehicular accesses.

2. Page 3-15 - Rewrite **Policy CIR-1.7** to read as follows:

The County shall ensure that all new development proposals contain street and road networks that limit dead end roads and provide a minimum of two, improved, all-weather accesses.

3. Page 3-15 - Rewrite **Implementation Measure CIR-1.7a** to read as follows:

The County shall review its existing land development and zoning standards to ensure that all new land divisions and all new non-residential developments provide a minimum of two, improved, all-weather accesses.

4. Pages 8-2, 8-3 and 8-4 - Rewrite **Fire Protection; Fire Hazards; Wildland Fire Protection; Fire Department Medical Response; and Fire Department Homeland Security/Hazardous Materials Response** as follows:

Fire Protection

The Tehama County Fire Department (TCFD) is administered under contract by the California Department of Forestry and Fire Protection (CDFP) and provides fire protection, emergency dispatching, specialized training, equipment repair and

maintenance, fire prevention, fire safety education and emergency medical responses to the unincorporated areas of Tehama County with the exceptions of the Gerber and Capay Fire Protection Districts. Thus, in Tehama County, the Tehama County Fire Department and the California Department of Forestry and Fire Protection are integrated departments that mutually support each agency's fire suppression and emergency response efforts.

The TCFD has automatic aid agreements with the Red Bluff City Fire Department, the Corning City Fire Department, the Gerber Fire Protection District, the Butte County Fire Department, Lassen Volcanic National Park, and the Shasta County Fire Department. Additionally, the TCFD has mutual aid agreements with the Capay Fire Protection District and the Cottonwood Fire Protection District.

The Tehama County Fire Department currently provides fire responses to the citizens of Tehama County through a network of sixteen fire stations and fifteen volunteer fire companies. At present, five of the stations, Los Molinos, Corning, Bowman, El Camino, and Antelope are staffed year round twenty-four hours a day. In 2006 TCFD personnel included 140 volunteers, and 10 career firefighters to staff 25 fire engines, 8 rescue squads, and 9 water tenders. Career California Department of Forestry and Fire Protection (CDF) firefighters are contracted by TCFD to augment wintertime fire protection staffing.

This distribution of stations places most residents of Tehama County within five road miles of a responding fire station. Prompt reporting and dispatching of a fire, equipment and personnel availability, water supply and time of response (directly affected by distance and type of staffing) are critical elements in the success or failure of structure fire protection. For more information, see the Tehama County Background Report, Sections 7.0 (Community Facilities and Services) and 9.0 (Hazards).

Fire Hazards

A *Fire Management Plan 2005* was prepared for Tehama County by CDF in cooperation with the Tehama County Fire Safe Councils. The Tehama/Glenn Unit includes areas in both Tehama and Glenn Counties. The plan is the instrument by which pre-fire planning activities are identified, prioritized and implemented through the cooperative efforts of local fire agencies and fire safe councils. It has been noted that most of the non-federal land outside the valley floor of Tehama County is classified as wildland area that may contain substantial forest fire risks and hazards. Furthermore, rural and wildland development has increasingly impacted wildland fire suppression priorities in areas where development has moved into the grasslands, oak woodlands, and forests. Generally referred to as the "Wildland-Urban Interface," this encroachment of dwellings into previously uninhabited areas has exacerbated the challenges of managing wildland fires.

WILDLAND FIRE PROTECTION

Tehama County Fire Department (TCFD) is responsible for suppression of wildland fires (vegetation fires) within the Local Responsibility area (LRA) not protected by other jurisdictions. The California Department of Forestry and Fire Protection (CDF) is financially responsible for wildland fire suppression and prevention in the State

Responsibility Area (SRA). The cities of Red Bluff and Corning, and fire protection districts in Gerber, and Capay are responsible for wildland fire suppression within their jurisdictions. The U.S. Forest Service is responsible for the suppression of wildland fires on National Forest property not protected by other agreements. The TCFD provides wildland fire protection through its existing fire department organization and resources.

The TCFD is combination career and volunteer department. Time constraints for training the volunteers result in only one or two training sessions per year being devoted solely to wildland fire tactics, methods, and procedures. TCFD volunteer firefighters range in age from eighteen to sixty-five. While some volunteers maintain a physical fitness program that allows them to perform well during wildland fires, volunteers are most effective on smaller fires and emergencies of limited duration.

FIRE DEPARTMENT MEDICAL RESPONSE

Tehama County Fire Department (TCFD) provides various levels of emergency medical services (EMS) to an area of 2,951 square miles with a population of about 40,000 people. Approximately 64% of TCFD responses over the past five years have been to EMS emergencies. These include traffic collisions, which require a combination of fire protection, rescue and EMS. In 2000 emergency medical incident responses for TCFD/CDF totaled 1,527. In 2005 emergency medical incident responses for TCFD/CDF totaled 2,727, a 78.6 percent increase. Based on proposed development and subsequent population increases the number of emergency medical incident responses by TCFD/CDF will continue to rise. For a complete description of the emergency medical response services provided by the TCFD, please see the Tehama County Background Report, Section 7.0 (Community Facilities and Services).

FIRE DEPARTMENT HOMELAND SECURITY/HAZARDOUS MATERIALS RESPONSE

The Tehama County Fire Department (TCFD) currently trains personnel to the state mandated minimum level of *First Responder Haz Mat Operational*. Some CDF employees within the Unit are certified to the *Hazardous Materials Technical Specialist* level. TCFD has no legal responsibility for abatement of hazardous materials incidents; however, because TCFD is a "first responder" to this type of incident and its mission includes the protection of life and property, TCFD takes basic action to isolate and deny entry.

The threat of a terrorist attack has permeated even the rural areas of the United States; consequently, Red Bluff City Fire Department, Tehama County Sheriff's Office, California Office of Emergency Services, and TCFD/CDF operates, staffs, and maintains a Mass Casualty Incident/Decontamination (MCI) trailer. Funded by a Department of Homeland Security grant the MCI trailer has the capability of providing the equipment for mass decontamination and injury triage and treatment.

5. Page 8-10 - Rewrite **Policy SAF - 3.1** to read as follows:

The County shall require accepted fire resistive construction practices, including but not limited to site design and layout; use of appropriate landscaping and building materials; and the installation of automatic fire sprinklers on new and redevelopment projects.

6. Page 8-10 - Rewrite **Implementation Measure SAF-3.1a** as follows:

The County will continue to enforce local, state, and federal fire and safety codes. The County Fire Departments and all fire protection districts will enforce the uniform codes adopted by the California Building and Standards Commission and the Office of the State Fire Marshal in addition to fire and life safety regulations within the California Government Code and Code of Regulations and those adopted via county ordinance(s).

7. Page 8-11 - Rewrite **Implementation Measure SAF-3.1b** as follows:

Require all new developments located in “Very High Fire Severity Zones” and “High Fire Severity Zones” to conform to California’s Wildland Urban Interface Building Standards.

8. Page 8-11 - Rewrite **Implementation Measure SAF-3.1c** as follows:

Ensure through the project review process that new developments include accepted fire engineering and design features that complement and enhance fire suppression capabilities and reduce fire hazards. Fire engineering and design features include sufficient fire hydrant “fire flow” capacity and/or residential fire sprinklers.

9. Page 8-11 - Rewrite **Implementation Measure SAF-3.1d** as follows:

Require that new developments and redevelopment project provide for safe, all weather, unobstructed access for emergency equipment and simultaneous civilian evacuation.

10. Page 8-11 - Rewrite **Implementation Measure SAF-3.1f** as follows:

Require on-site fire suppression systems for new commercial and industrial development, as well as multi-family residential development with five or more units, to reduce the impact on fire department equipment and personnel.

11. Page 8-11 - Rewrite **Policy SAF - 3.2** to read as follows:

The County shall prohibit new developments in “High and Very High Fire Severity Zones” and other fire prone areas or require mitigation to minimize hazards to acceptable levels.

12. Page 8-11 - Rewrite **Implementation Measure SAF-3.2a** as follows:

Review development proposals to determine if new development projects are located in “High” or “Very High Fire Severity Zones” or fire prone areas. If development is permitted in these areas, ensure that mitigation measures are required and followed.

13. Page 8-11 - Rewrite **Policy SAF - 3.3** to read as follows:

The County shall ensure that sufficient levels of service for fire protection are maintained by requiring development projects to provide and/or fund fire protection facilities, personnel, operations, and maintenance or provide alternative methods that sustain adequate levels of service.

14. Page 8-12 - Rewrite **Implementation Measure SAF-3.3a** as follows:

Where determined to be necessary, the County will require as condition of approval the dedication of land and/or establishment of an appropriate funding mechanism to help offset costs for fire protection facilities and services.

15. Page 8-12 - Rewrite **Implementation Measure SAF-3.3b** as follows:

Require new construction to pay their fair-share for necessary fire protection improvements by continuing to review Chapter 9.15 of the Tehama County Code (Development Impact Mitigation Fees).

16. Page 8-12 - Add **Implementation Measure SAF-3.3c** as follows:

Require, in the areas of the county not served by rated fire hydrants (minimum of 250 gallons per minute for 2 hours), that any new dwelling unit have installed an engineered, automatic fire suppression system that complies with the most current edition of NFPA 13D.

17. Page 8-12 - Rewrite **Policy SAF - 3.4** to read as follows:

The County shall continue to support and cooperate with the California Department of Forestry and Fire Protection (CDF) in providing fire protection services and fire prevention programs for the unincorporated areas of the County.

18. Page 8-12 - Rewrite **Implementation Measure SAF-3.4a** as follows:

Participate in mutual aid agreements and continue to collaborate with CDF and the county's fire departments and fire protection districts.

19. Page 8-12 - Rewrite **Implementation Measure SAF-3.5e** as follows:

Require and inspect for compliance with California Code Public Resources Code Section 4290-4299; Tehama County Code Chapter 9.14 (Fire Safe Regulations); and adopted Development Standards.

20. Page 8-13 - Rewrite **Implementation Measure SAF-3.5f** as follows:

Encourage strategic road placement and the use and maintenance of firebreaks, fuel breaks, and green belts for effective pre-fire suppression planning by local fire departments and districts, the U.S. Forest Service, Bureau of Land Management, and the California Department of Forestry and Fire Protection.

21. Page 8-13 - Rewrite **Implementation Measure SAF-3.5g** as follows:

Encourage and promote the installation of smoke detectors and fire extinguishers in existing structures through continuing public education. Encourage and promote the installation of residential fire sprinklers in all new residential housing.

22. Page 8-13 - Rewrite **Implementation Measure SAF-3.5h** as follows:

Require businesses and homes to have legible, lighted and/or reflective address signs located along identified streets.

23. Page 8-13 - Rewrite **Implementation Measure SAF-3.5j** as follows:

The County Fire Department, in conjunction with CDF and local fire protection agencies, will implement the following fire prevention programs as funding and staff availability allow:

- Upon request, assist businesses in preparing their fire prevention plans.
- Present fire prevention programs at local schools and community events.
- Carry out routine fire inspections.
- Perform pre-fire plan inspections for businesses, Office of State Fire Marshal regulated facilities, and all medium and high hazard occupancies.

As a general comment, TCFD personnel made some additions and changes to a previous version of "Goals, Policies, and Implementation Measures." In the ADGP, these Goals, Policies and Implementation Measures were altered or deleted without explanation. Some of the changes are significantly different from the TCFD's original offerings and seemed arbitrary. An opportunity for dialogue with whoever made these changes would be appreciated.

Additionally, the time available for response to the ADGP seems unreasonably short. This document was not distributed until December 7, 2006. It was also the first opportunity to review the entire ADGP. Given the significance of this document it is surprising that departmental/agency response is placed on the "fast track" without guidance.

Please call me if you have any questions.

Sincerely,

Steve Sherman
Battalion Chief
CDF/Tehama County Fire Department