



# County of Santa Cruz

---

## **FIRE DEPARTMENT ADVISORY COMMISSION**

P.O. DRAWER F-2, 6059 HIGHWAY 9, FELTON CA 95018

(831) 335-5353 FAX: (831) 335-4053 TDD: (831) 454-2123

**DOUG AUMACK, CHAIRMAN**

September 2, 2016

The Honorable Bruce McPherson, Chairman  
Santa Cruz County Board of Supervisors  
701 Ocean Street, Fifth Floor  
Santa Cruz, CA 95060

Subject: Proposed Ordinance Regarding the Commercial Cultivation of Medical Cannabis

Dear Chairman McPherson and Members of the Board:

At your Board's request, the Fire Department Advisory Commission (FDAC) reviewed and discussed the proposed ordinance regarding the commercial cultivation of medical cannabis at its July 20, 2016 meeting. This letter is to provide your Board with our comments and recommendations in relation to fire and emergency response associated concerns on the proposed ordinance.

The FDAC commends County staff on their request for our review and input of this detailed proposed ordinance. We have the following concerns and suggestions that we feel should be considered in the process of application, review, and granting of licenses which should further reduce the potential for life and property loss related to cannabis cultivation. The FDAC recommends the following details be included in the proposed ordinance to maintain County safety:

### FIRE PREVENTION/SUPPRESSION CONCERNS:

The Santa Cruz County Fire Marshal's Office will continue to require the builder to meet all of the current building requirements based on the size and use of the building. If the "grow" has a building, then that building requires building permits. Specific requirements such as water storage, hydrant, access road(s), proper addressing, turnouts, turnarounds, vegetation clearance, and fire sprinklers (depending on size) are already incorporated into the current building/planning requirements and should be adhered to and enforced. There are existing fire code requirements which address cooking or warming fires and requirements for generator use. If the "grow" is to be located on property that has an existing residence; all current requirements such as access, water storage, and sanitation should already be in place. Any new construction for the "grow" would be required to follow the existing permit process and meet all current building standards and fire code requirements.

Below are the additional points delineated by the FDAC at the July 20, 2016 meeting:

- Adherence to the requirement for appropriate apparatus access, ingress, and egress.
- Adequate on-site fire prevention resources such as smoke or heat detectors.
- On-site fire suppression resources such as fire extinguishers and adequate water storage for commercial or residential properties.
- Compliance with electrical load maximums and established safety measures.
- The ordinance should address on-site storage hazards associated with primary and secondary production; i.e. chemicals, hazardous materials, storage of harvested product, dumping, etc...
- In order to equip emergency responders with the most up to date and complete information, the Computer Aided Dispatch (CAD) should capture all licensed production site locations, including contact information and specifics of the property such as: location of locks, gate keys or codes, guard information, and Knox Box access for gated properties.
- Establish whether or not NFPA 704 fixed facility placarding standards apply for on-site amounts of fuels, butane, propane, diesel, etc.
- Require CEQA (California Environmental Quality Act) standards where applicable.
- Require the CAL FIRE LE-100 inspection process prior to licensing to assess addressing issues, accessibility, and defensible space in relation to the size of the “grow”.
- Subterranean grows will require notification and compliance with the current fire code.
- Existing non-compliant structures must comply with current building and fire code requirements.
- Verify that bridges conform to existing truck size and weight limit laws.

#### OTHER NON-FIRE CONSIDERATIONS:

- Must meet current residential, agricultural, and/or commercial building codes.
- Notification via mail or newspaper to surrounding area residents prior to licensing.
- Possible need for additional security and surveillance, 24x7 monitoring.
- District 2 may have a current policy in place that prohibits outside “grows”.
- Any alternate power source should be permitted and follow current code.
- Generator usage may need to be addressed such as: hours of operation, noise pollution, fuel, safety, etc.
- Possible hours of operation limits may be in order due to traffic and generator noise.

- Funding of law and code enforcement.

In summary, these are areas of addition or further definition. Details that we felt should be included in the scope of a process to more fully address fire prevention, fire suppression, and general safety as part of granting a license. Please contact me with any questions or concerns that our list may raise. I would be happy to expand on any item that would lend further understanding from our perspective. Thank you for considering these recommendations.

Sincerely,

*Doug Aumack*

Doug Aumack, Chair  
Santa Cruz County Fire Department Advisory Commission