



2600 BONITA LATERAL RD.
SANTA MARIA, CA. 93458-9703

June 12, 2008

Santa Barbara County Clerk of the Board
barbara.ca.us
105 E. Anapamu St., Room 407
Santa Barbara, CA 93101
Attn: Board of Supervisors

sent via e-mail: sbcob@co.santa-

Re: Item 6: Adoption of an Ordinance Amending Chapter 15 of the Santa Barbara County Code

Dear Honorable Board of Supervisors:

On behalf of the Teixeira Farms family and other farming families throughout the Santa Maria Valley we provide the following concerns to the proposed ordinance amending Chapter 15 of the Santa Barbara County Code:

1. Fire Sprinkler Requirements in Cold Rooms:

Proposed County Code: SECTION 903 AUTOMATIC SPRINKLER SYSTEMS: The proposed ordinance supplements the 2007 Fire Code by requiring Automatic Sprinkler Systems in “all new buildings and structures (including prefabricated or relocated structures) for which application for building permits are officially filed ...(regardless of square footage) outside of the “Urban Limit Line” (Section 903.7.1.2.)

Discussion: This goes above and beyond the 2007 Fire Code, which allows for certain building classifications such as U, S-1 (up to 12,000 sq.ft.) and S-2 to be exempt from sprinklers due to their low-hazard nature. We believe that Cold Rooms for the cooling and storage of fruit and vegetable products fall within the S-2 classification and therefore should be exempt from automatic sprinkler systems. The proposed ordinance, if adopted as written, would require all buildings, regardless of size, classification or type of construction to contain a sprinkler system.

Suggested Remedy: Add Item #4 to the Exception Category under Section 903:

“4. Under certain circumstances, automatic fire sprinklers may not be required in Cold Rooms, used for cooling and storage of fruits and vegetables. If the Cold Room is converted to any other use, i.e. storage of non-refrigerated items, sprinklers will be required. In no case shall the exception from sprinklers be less than the exceptions contained in the 2007 CFC and/or 2007 UBC.”

Reasons for this Request:

- Cold Rooms have a very low potential of a fire capable of starting due to their type of construction (typically metal buildings); low temperatures (at or below 32°); and nature of the product stored (fruits and vegetables).
- The 2007 Fire Code exempts certain building classifications such as U, S-1 (up to 12,000 sq.ft.) and S-2 from sprinklers due to their low-hazard nature. Most Cold Rooms may be classified as S-2.
- They are generally a low-intensity and low-fire-risk use.
- Cold Rooms are generally isolated buildings or a group of buildings in rural areas surrounded by irrigated agriculture.
- Installation of automatic fire sprinklers in cold rooms require additional engineering and design features due to the near freezing temperatures (i.e. nitrogen charged/pressure activated systems in lieu of water must be used in the lines). This adds considerably to the cost for design and installation for a low-risk hazard and an undue financial hardship to an industry already under intense pressure from high fuel prices, competition with global markets, food safety measures and other operating expenses.

2. Fire Flow and Water Storage Requirements for Cooling Facilities:

Proposed County Ordinance: SECTION 508 FIRE PROTECTION WATER SUPPLIES:
Section 508.1 Required water supply is proposed to be amended by adding the following sentence to the end of the paragraph, “Fire protection water supply systems shall be installed and maintained in accordance with Santa Barbara County Fire Department Development Standards.”

Discussion: The only Development Standards for stored water pertain to systems serving one or two family dwellings. This leaves stored water requirements for many other uses open and ambiguous. Fire flow and water storage requirements for agriculturally-related development located in rural areas is typically based upon Table B105.1 found in Appendix B of the 2007 State Fire Code resulting in significant water storage requirements for cooler facilities. Due to the nature of Cold Storage of fruits and vegetables it is necessary to house our facilities in larger buildings to prevent a break in the cold-chain, which is not allowed due to food safety and best management practices, resulting in excessive stored water requirements.

However, the 2007 State Fire Code provides several alternatives to strict adherence to Table B105.1 for fire flow/water storage requirements in rural areas, as follows:

Section 508.3 states: “Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method *or Appendix B*” (italics added in the code).

Appendix B, Section B103.1 of Appendix B Modifications specifically allows for decreases in fire flow requirements as suggested in Appendix B “for isolated buildings or a group of buildings in rural areas or small communities where development of full fire-flow requirements is impractical.”

Appendix B, Section B103.3 specifically references NFPA 1142 may be used to determine water supplies for fire-fighting purposes in rural and suburban areas.

Suggested Remedy: Add a follow-on sentence to Section 508.1 Required water supply, stating:

“Water supplies for fire-fighting purposes in rural and suburban areas shall take into account modifications contained in Appendix B and guidelines within NFPA 1142.”

Reasons:

- This would make it clear that there are alternatives to Appendix B, Table B105.1 as provided in the 2007 State Fire Code, reducing excessive water storage requirements.
- This would allow driven wells to be considered as an acceptable source of water, as recognized in NFPA 1142, Standard on Water Supplies for Suburban and Rural Fire Fighting. Acknowledging the use of driven wells as an acceptable water source will prevent massive quantities of water being pulled from the groundwater to be stored in tanks or reservoirs. Cooler facilities, typically located within areas of irrigated agriculture, have access to wells that draw from the groundwater basin.

We have discussed our concerns with the Fire Department and believe we can develop a workable solution. Our request is in keeping with the Agricultural Advisory Committee’s recommendation by leaving the door open to continue to work with the Fire Department in developing standards specific to the Cooler Industry. Moreover, our request is consistent with the 2007 State Fire Code and would not allow anything that is not otherwise allowed. We appreciate your Board of Supervisors consideration of our request so that we can continue to seek practical provisions for our shared interest in providing adequate fire protection at our facilities while not overburdening or creating excessive, and impractical measures, to our facilities.

Respectfully Yours,

Lisa M. Bodrogi
Land Use Planner, Teixeira Farms
lisa@teixeirafarms.com
Ph: 805-928-3801 FAX: 805-922-7433