



August 29, 2008

Santa Barbara County Clerk of the Board sent via e-mail: sbcob@co.santa-barbara.ca.us
105 E. Anapamu St., Room 407 & FAX: 805-568-2249
Santa Barbara, CA 93101
Attn: Board of Supervisors

Re: Item 2: Second Reading of an Ordinance Amending Chapter 15 of the SB County Fire Code

Dear Honorable Board of Supervisors:

The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties respectfully requests that the following language be added to the list of **Exceptions** contained in **Section 903.7.1**, in the proposed ordinance amending Chapter 15 of the Santa Barbara County Code:

3. “Cold Rooms classified as Group S-2, Low-Hazard Storage, used for cooling and storage of fresh produce (including but not limited to fruits, vegetables, and flowers), may be exempted on a case-by-case basis in writing by the Fire Chief based upon another suitable alternative method of fire protection, including but not limited to: coordinated Emergency Response, Tactical Assessment and Pre-Fire Plans, remote shutdown capabilities, alarm systems, etc. (subject to the same occupancy change conditions as noted in “Exception 1” above.)

Our request is respectfully submitted based upon the following:

- Consistency with the 2007 State Fire Code, which exempts from sprinkler requirements low-hazard storage buildings (Group S-2). The State Fire Code provides the flexibility and allows local jurisdictions the discretion to determine what is appropriate to balance the needs of their particular community.
- Proper Emergency Preparedness is essential in operating a cold room in compliance with multiple public safety agency jurisdictions. Serious hazards may result due to the combination of anhydrous ammonia and water during a fire event. See attached, page 4, 3rd bullet, second paragraph: “Discuss hazards with emergency responders...who don’t understand the thermodynamic concerns e.g. flashing hazards associated with adding water to a pool of liquid ammonia.’ In a phone conversation with Steve Maher of Risk

Management Professionals he quoted: “adding water, particularly through an automated system, can be extremely hazardous in a cold room environment.”

- The significant cost associated with a Fire Sprinkler system, in the hundreds of thousands of dollars, to an industry that cannot pass that additional cost on to the consumer.

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. Prices for agricultural commodities are determined globally, not locally. We are competing with other countries and jurisdictions that don't have the same mandated requirements for safe and secure food. If we are to continue to produce Santa Barbara County/California Grown food we must seek innovative and practical solutions to balance important competing public interests.

Sincerely,

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President
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