



Mendocino County Board of Supervisors
501 Low Gap Road
Ukiah, CA 95482

August 18, 2020

Re: agenda Items 4o and 4r - Fire District Ordinances

Honorable Supervisors,

MCA supports all acts that reinforce fire safety and we certainly appreciate the efforts of the local fire districts to keep our communities safe. At first glance, the requested approval of the fire ordinances on the Consent Calendar makes sense. However, we believe that a more careful reading and consideration of the ordinances might be warranted.

We request refinements of several sections be recommended by the Board.

Specifically, the proposed amendments to Section 105.61, requiring Additional Operational Permits (on page 5 of each of the ordinances in Agenda items 4o and 4r) is proposed for ALL cultivation. We believe that there should be a distinction between operations that utilize electrical equipment and those that do not. We already have building permit review for fire safety, including adherence to building and fire codes and regulations and we have CalFire clearance to ensure fire safety rules are being adhered to. Yet another permit for activity that might not create a special hazard, especially when there are safety protections built into the review process for any structures that might be involved, seems unnecessary and duplicative. Refining the list of operations that might need an Additional Operational Permit could prevent unnecessary duplication without compromising safety.

Additionally, both Fire District ordinances propose a change in use classification (page 8 RVCFD, page 7 HFPD) that would classify all "Agricultural crop production, including cultivation, drying, processing and/or storing" as F1 moderate hazard uses. This appears to be more stringent than the County's policy of allowing things like dry sheds to be Ag Exempt and not F1 if there are no workers or members of the public. To require F1 structures without exemptions would put applicants back to where we started before the Board encouraged the Building Official to expand the use of less onerous, but still safe occupancy use classifications, such as Ag Exempt, when possible. Again, the fire safety of all structures with building permits is examined during the building permit application process. To disallow the use of Ag Exempt building permits for dry sheds in these districts after applicants had gone through the process to

get those types of building permits, would thwart the progress in streamlining that has been made.

Thank you for your consideration.

Mendocino Cannabis Alliance