permit SONOMA

County of Sonoma

Exception – Same Practical Effect 14 CCR §1270.06

California Department of Forestry and Fire Protection Fire Safe Regulations, 14 California Code of Regulations, §1273.00, require developments in the State Responsibility Area to provide for safe access for emergency wildfire equipment and civilian evacuation concurrently. Applicant hereby requests an exception to standards to provide the same practical effect pursuant to 14 California Code of Regulations §1270.06 due to environmental conditions and physical site limitations. A map of the development project area and licensed professional plans documenting the same practical effect alternative is included with this application as Exhibit A.

To have the same practical effect for safe access for emergency wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulation during a wildfire emergency consistent with 14 CCR 1273.00 through 1273.09

INDEMNIFICATION AGREEMENT

As part of this application, applicant agrees to defend, indemnify, release and hold harmless the County, its agents, officers, attorneys, employees, boards and commissions from any claim, action or proceeding brought against any of the foregoing individuals or entities, the purpose of which is to attack, set aside, void or annul the approval of this application or the adoption of the environmental document which accompanies it. This indemnification shall include, but not be limited to, damages, costs, expenses, attorney fees or expert witness fees that may be asserted by any person or entity, including the applicant, arising out of or in conjunction with the approval of this application, whether or not there is concurrent passive or active negligence on the part of the County. If, for any reason any portion of this indemnification agreement is held to be void or unenforceable by a court of competent jurisdiction, the remainder of the agreement shall remain in full force and effect.

Applicant Name: Thomas Planson

Applicant Signature: Thomas A Planson

Owner Name: Thomas Planson

Owner Signature: Thomas A Planson

File Number: UPC18-0046 APN: 069-040-026 Date: 01/11/22

permit SONOMA

County of Sonoma
Permit & Resource Management Department

Exception – Same Practical Effect 14 CCR §1270.06

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Applicant Name: Thomas Planson

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File Number: UPC18-0046 APN: 069-040-026 Date: 01/11/22

** OFFICE USE ONLY **

Submitted To CalFire: 10/25/2022 Number of Pages: 35

*NOTE: The purpose of the Indemnification Agreement is to allow the County to be held harmless in terms of potential legal costs and liabilities in conjunction with permit processing and approval.

Code Sections Requesting Exception:

X	1273.01	Width
	1273.02	Road Surface
	1273.03	Grades
	1273.04	Radius
	1273.05	Turnarounds
	1273.06	Turnouts
	1273.07	Road and Driveway Structures
X	1273.08	Dead-End Roads
	1273.09	Gate Entrances

Physical Site Limitations and Environmental Conditions:

Please see **Appendix A**.

Alternative Methods to Mitigate the Problem and Provide the Same Practical Effect Toward Defensible Space:

Please see Appendix B for Secondary Egress Description.

Please see Appendix C for Alternate Emergency Evacuation Route.

Please see Appendix D for Water Storage Description.

Please see Appendix E for Analysis of First Two Years of Reservoir Use.

Please see Appendix F for Fire Safety alternate measures

Right to Appeal: The Fire Marshal's acceptance of this Exception to Standards will be reviewed, heard and decided by the decision making body that makes the determination for the development project pursuant to Sonoma County Code Section 26-92 and for subdivisions Section 25-13.5. If the project approval or denial is appealed to the Board of Supervisors pursuant to Sonoma County Code Section 26-92-160 or for subdivisions 25-13.5, to approve the exceptions to standards, the Board of Supervisors must find that the exception(s) proposed meet the requirements set forth in 14 California Code of Regulations §1270.06 and §1271.00. A written copy of any decision granting an appeal within a State Responsibility Area shall be provided to the local CAL FIRE Unit headquarters within ten (10) after the decision is final.

Appendix A

Physical Site Limitations and Environmental Conditions

Palmer Creek Road is a private road maintained by the residents. The portion of Palmer Creek Road leading to the project property is approximately 2 miles long and widths ranging from 12 to 20 feet. Palmer Creek Road largely parallels Palmer Creek, which is a tributary of Mill Creek and a part of the Russian River Watershed. The majority of Palmer Creek Road is located adjacent to steep slopes and mature vegetation. Palmer Creek Road has been recently used for large vehicle ingress and egress in three notable capacities:

(1) Most notably, Palmer Creek Road was used by emergency vehicles, including fire fighting apparatus, during the 2020 LNU Lightning Fire Complex that burned much of the Palmer Creek Area. FireFighters were able to successfully utilize Palmer Creek Road as a part of the fire fighting effort and saved multiple structures in the Palmer Creek Area as a result, including structures on the project parcel.

(2) Multiple logging operations have taken place in the Palmer Creek Area over the past few years. The most intensive effort included dozens of logging truck trips per day for the Lundborg parcel at 5376 Mill Creek Road, APN# 069-030-021, Cal_Fire Permit # 1-21EM-00102. This parcel is located significantly further down Palmer Creek Road past the applicants parcel toward the west. This logging effort transported over 1,000 truck loads of redwood timber for several months. These trucks interacted with passenger vehicles regularly without incident. Logging operations for Permit # 1-21EM-00308-SON on APN# 069-030-025 & Permit # 1-20EX-01515-SON on APN# 069-040-026, which are both owned by the applicant including the project parcel also traversed Palmer Creek Road for several weeks interacting with passenger vehicles regularly without incident. Figures 1-19 show Palmer Creek Road, Project Parcels driveway, Adjacent Parcel Driveway, and logging trucks passing concurrently with passenger vehicles.

(3) PGE has contracted with Asplundh and have operated over 50 large pieces of heavy equipment including ancillary service vehicles on Palmer Creek Road 8 hours a day every day for several months in a massive power-line clearing effort interacting with passenger vehicles regularly without incident.

The beneficial result of these several large operations and vehicle uses is that Palmer Creek Road has been significantly widened by the many trips of large tracked heavy equipment, large vehicles, and many other ancillary pieces of equipment resulting in new turnouts that have been established by the vehicle passing interactions. Palmer Creek Road has been proven to be usable for large vehicles in emergency situations with passenger vehicle interactions and has only improved as a result.

Efforts to widen Palmer Creek Road would result in significant environmental impact. Palmer Creek parallels Palmer Creek Road at a distance of 100-200 feet for the majority of its length, with two bridge crossings. Most of Palmer Creek Road is cut into steep slopes above Palmer Creek and densely forested. In order to widen Palmer Creek Road, significant cut and fill slopes would be required to daylight back to the existing grade. The required grading work would result in substantial soil disturbance, and vegetation clearing. Impacts would include: (1) Tree removal with further impact to nesting birds, bats and other biological species. (2) Impacts to Palmer Creek and the Russian River Watershed including its salmon species and other biological resources. (3) Impacts to the neighborhood with a multiyear road project would include noise from heavy equipment, significant traffic impacts from construction on the existing road, and impacts to the air from prolonged use of construction equipment. (4) in the long term, the area would be significantly altered aesthetically and while the road is currently stable, such significant disturbance would raise the potential for future landslides and movement. While all efforts would be made to mitigate these impacts, at this scale they cannot be eliminated entirely. Overall, a project to widen Palmer Creek Road would be challenging and have a negative impact. With the Road having a proven record of serving its regular and emergency purposes, such impacts would be ill advised.

Appendix B

Secondary Egress Description

The Project property has a secondary egress to Sweetwater Springs Road (a public road). The secondary egress begins on the Project property and runs in a generally southwesterly direction for approximately 3.2 miles and joins Sweetwater Springs Road. This secondary egress has been used by the owners of the Project parcel and the parcel to the south (currently owned by the Applicant) for many years. There are recorded easements over a portion of the road and the entire road has been used openly for over fifty years. The road is in very good condition. It varies in width between 12 & 20 feet. The road has been very well maintained and improved over the years.

Most recently during several emergency tree harvest operations permitted through Cal-Fire over the projects parcel APN# 069-040-026 and the parcel to the immediate south which is owned by the applicant APN# 069-030-025. During the permitted emergency tree harvest's large tracked equipment and vehicles similar to Cal-Fire emergency apparatus worked for several weeks and in doing so greatly widened and improved the road. These vehicles, equipment, and logging trucks egressed out to Sweetwater Springs Road without incident as Fire Apparatus did in 2020.

The road was extensively used by Cal-Fire during the 2020 LNU Lightning complex fires. Fire fighting equipment was able to successfully utilize this access route during the fire and successfully saved many structures. Because the middle bridge along Palmer Creek Road was being replaced at the time of the fire, this road provided the only ingress and egress to the area south of the bridge. This secondary egress road exists physically on the ground and provides a safe traversable route during an emergency for occupants on the Project property. Figures 10-13 Show the new Middle Bridge.

Map Of Secondary Egress Route

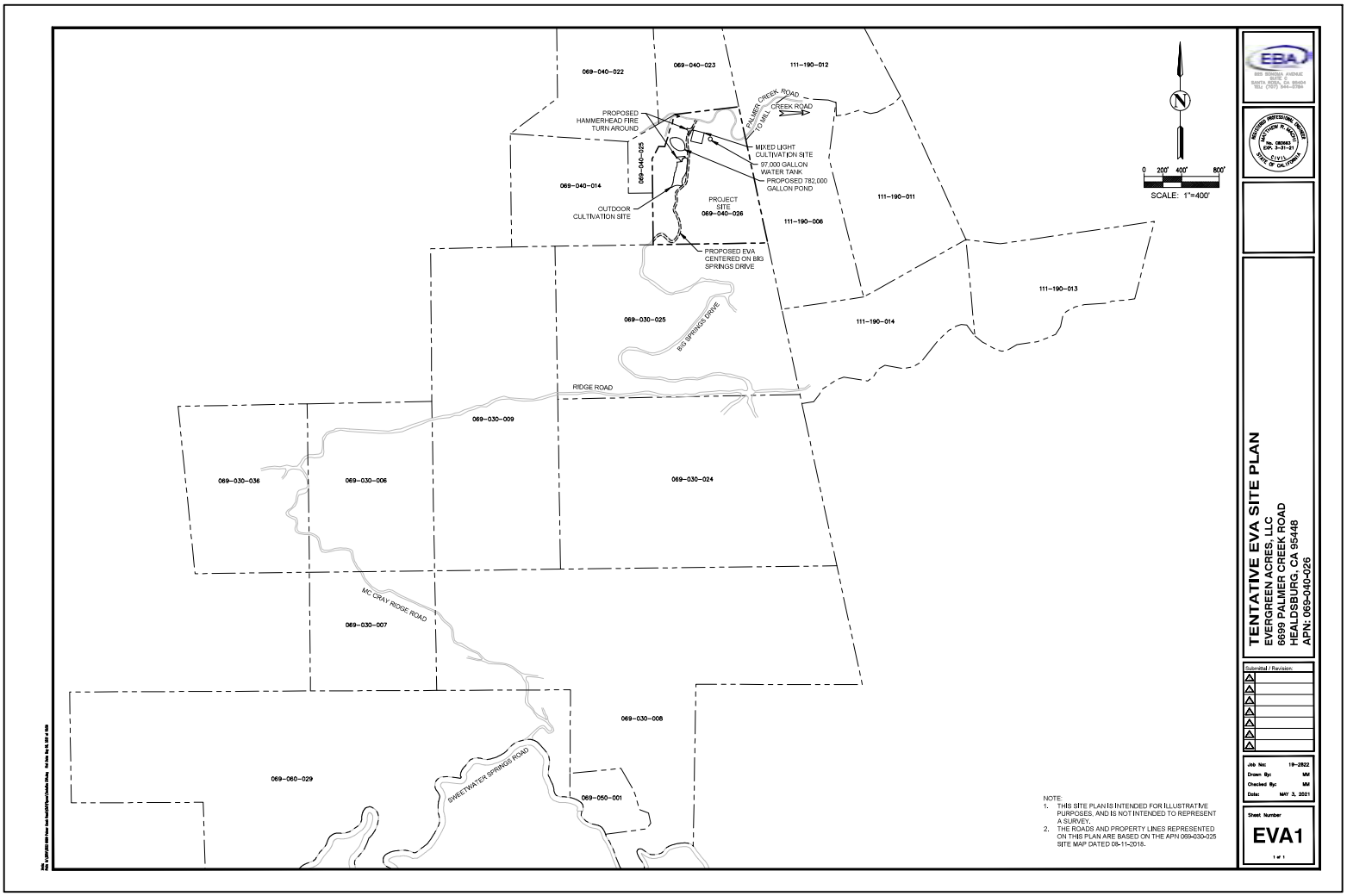


Fig 1. Project parcel looking north after Post Fire Recovery Tree Harvest

Fig 2. Entry for 2 Moon Vineyard looking South toward Sweetwater Springs Road

Fig 3. Looking North from Vineyard toward entry to applicants parcel APN#069-030-025

Fig 4. Logging Trucks passing project parcel and Traversing Palmer Creek Road to Mill Creek Rd.

Fig 5. Logging Trucks passing Project Parcel Concurrently with Other Vehicles on Palmer Creek Rd.

Fig 6. Logging Trucks passing Project Parcel Concurrently with Other Vehicles on Palmer Creek Rd.

Fig 7. Passenger Vehicle passing Logging Trucks Concurrently on Palmer Creek Road

Fig 8. Applicants 1500 series Truck Passing Logging Truck on Palmer Creek Rd. Concurrently

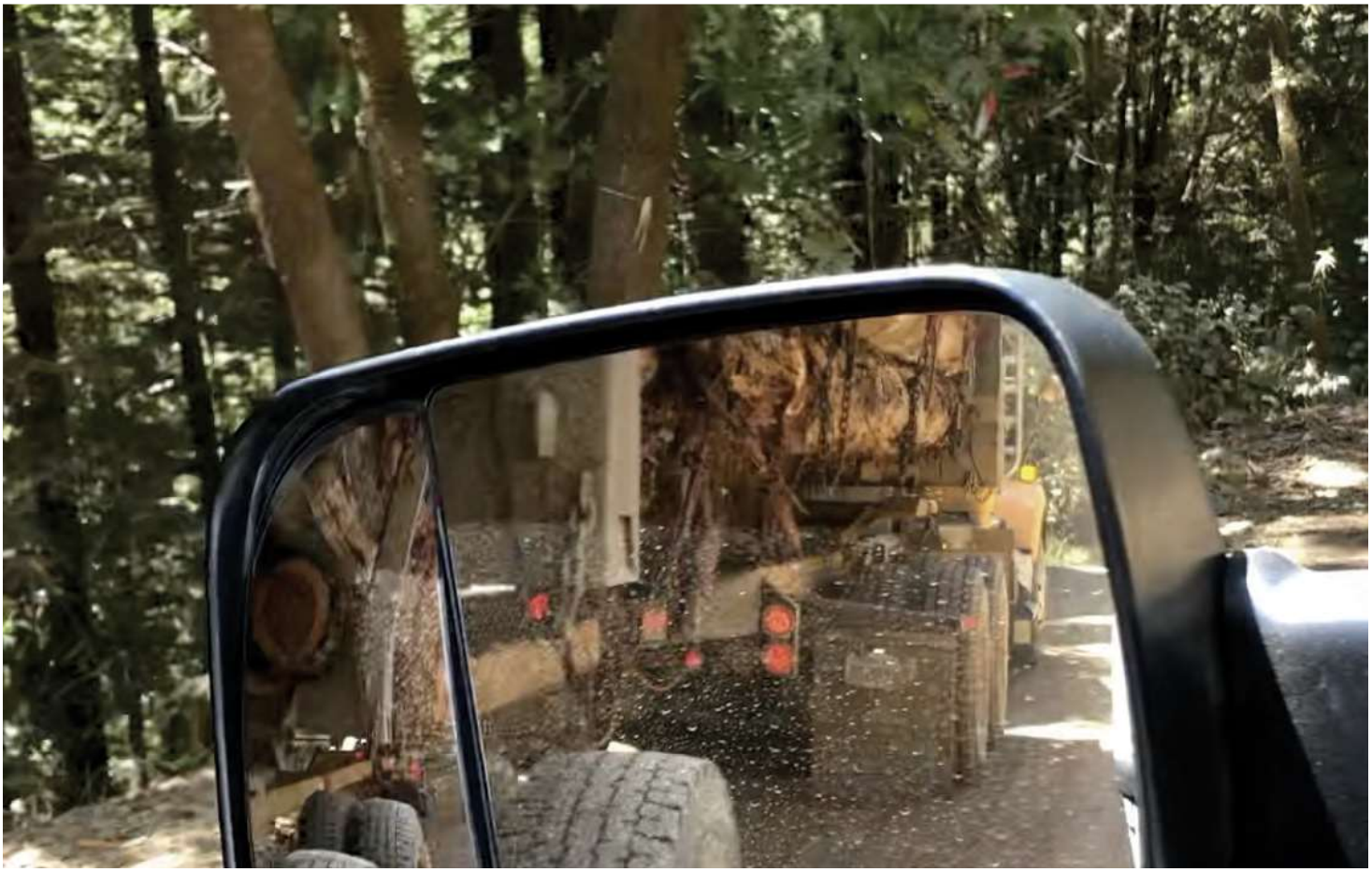


Fig 9. Applicants 1500 series Truck Passing Logging Truck on Palmer Creek Rd. Concurrently

Fig 10. New Middle Bridge on Palmer Creek Road looking South

Fig 11. New Middle Bridge on Palmer Creek Road looking South

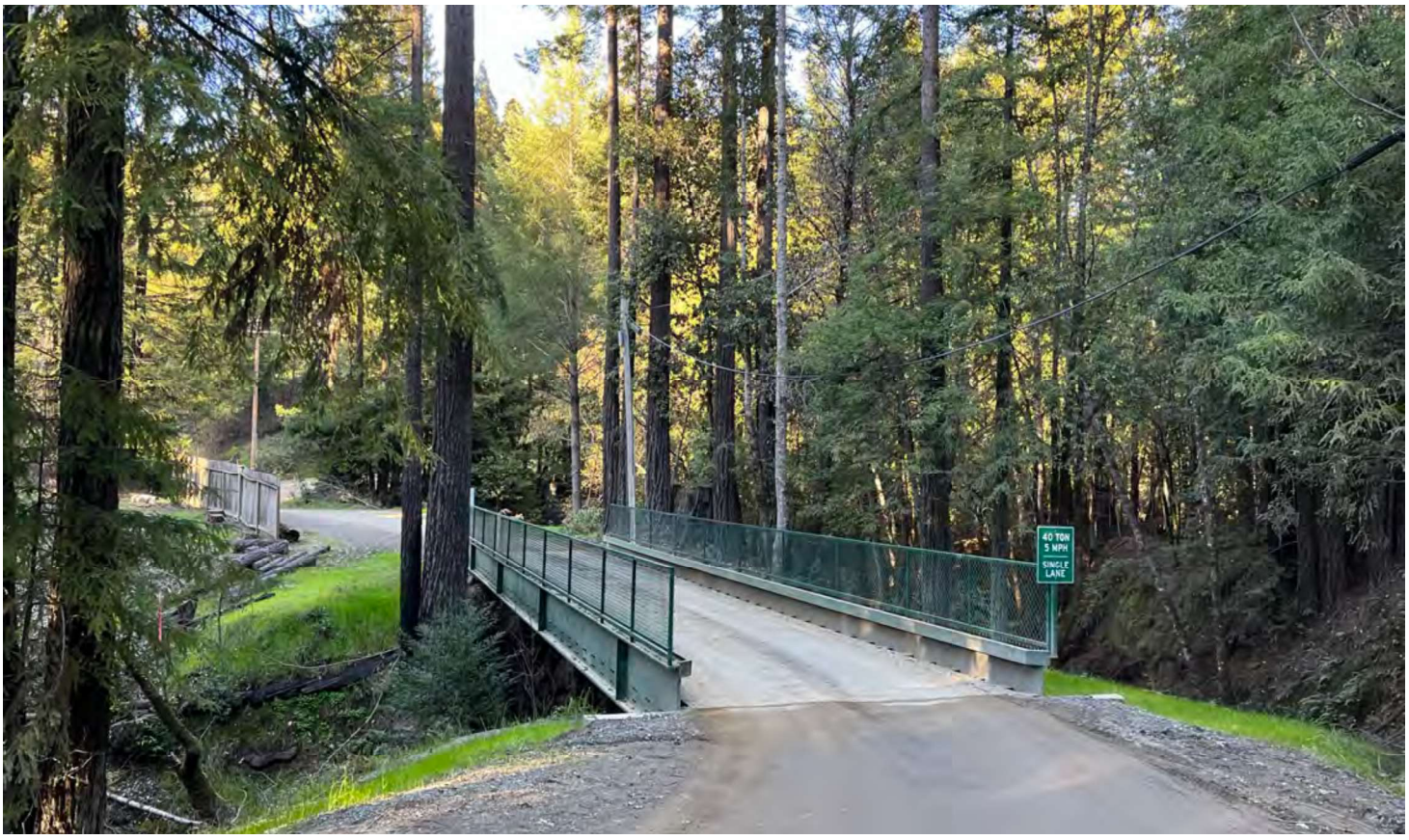


Fig 12. New Middle Bridge on Palmer Creek Road looking North

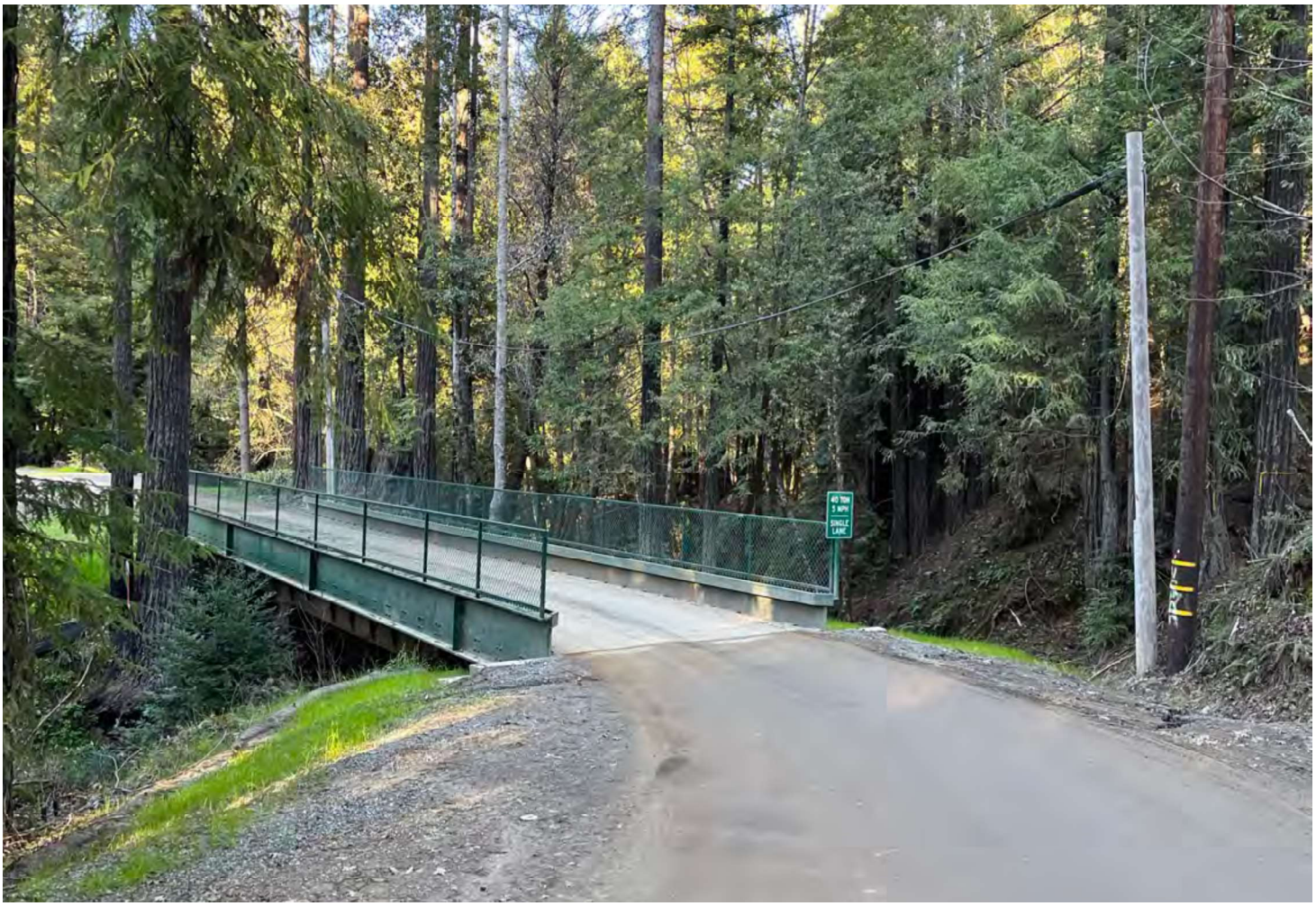


Fig 13. New Middle Bridge on Palmer Creek Road looking North

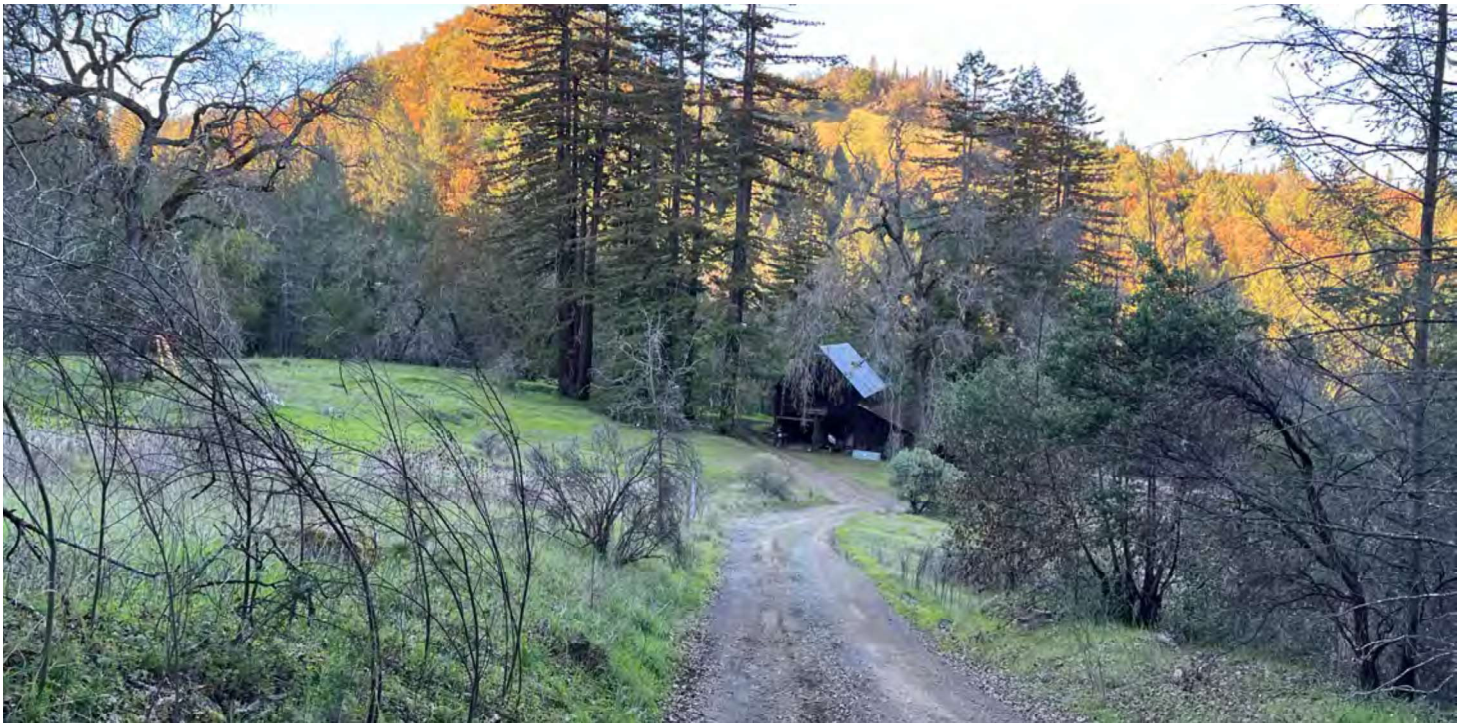


Fig 14. Project Parcels Driveway looking South toward Palmer Creek Road

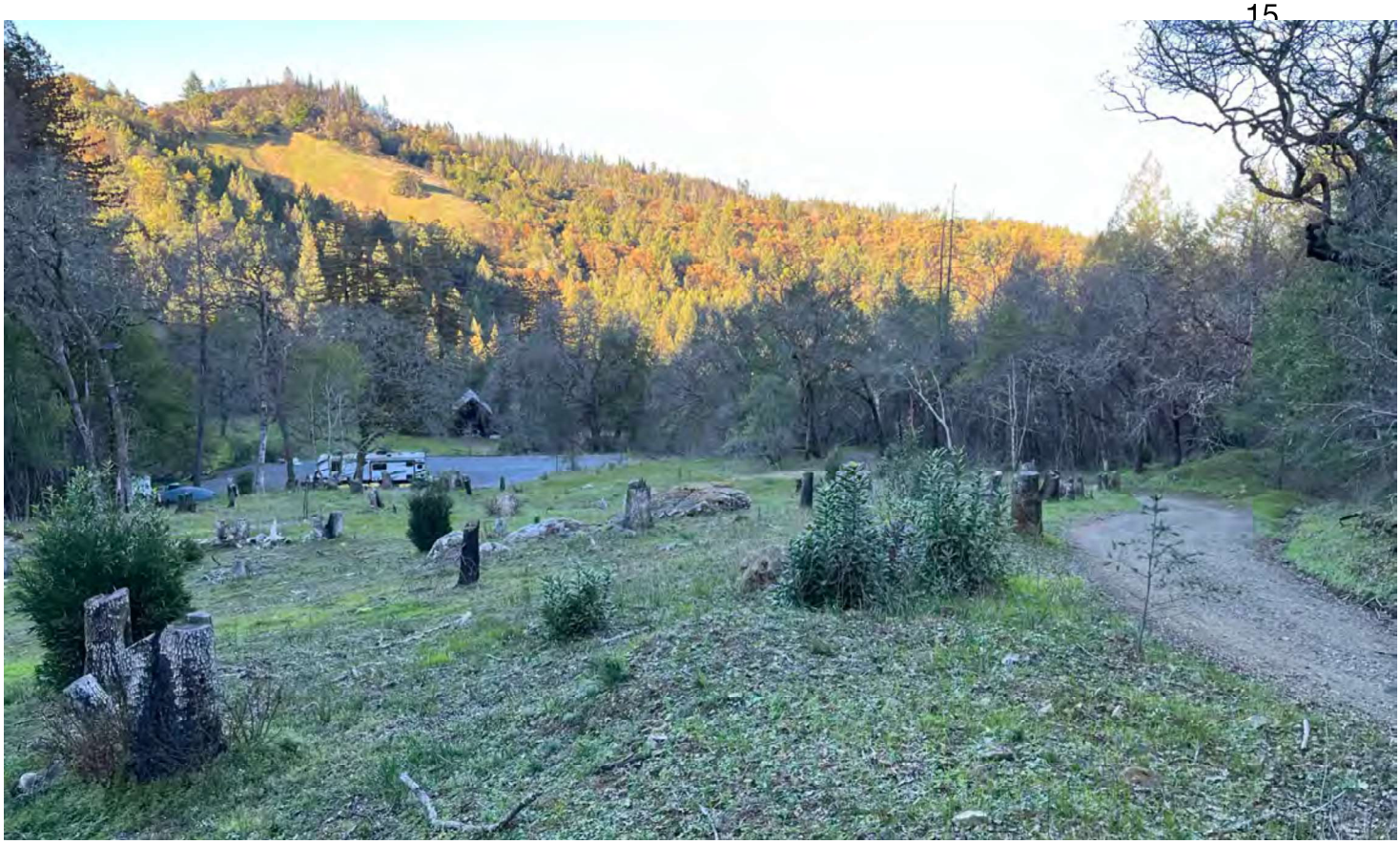


Fig 15. Project Parcels Driveway looking South toward Palmer Creek Road

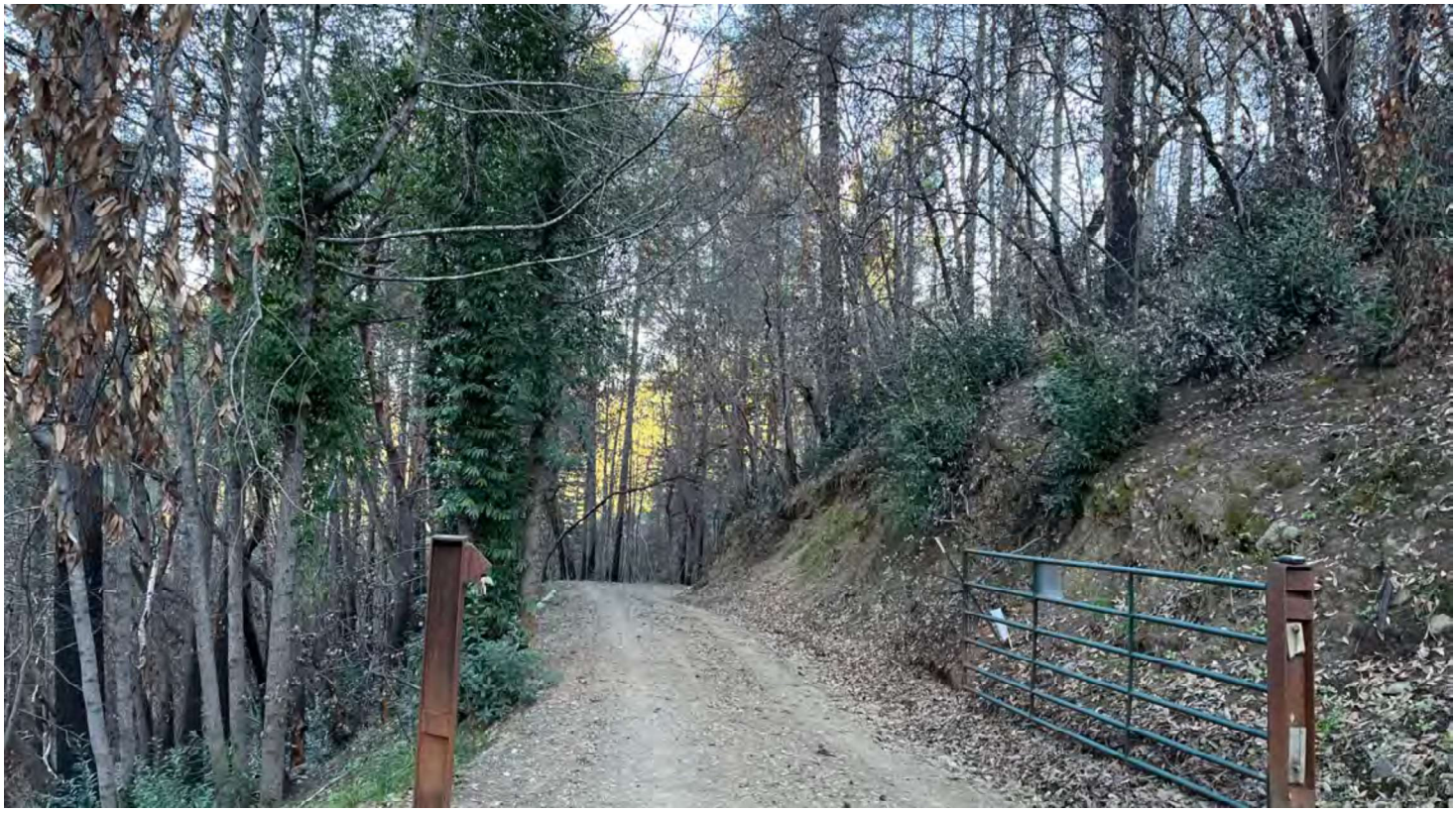


Fig 16. Project Parcels Driveway looking North toward Sweetwater Springs Road

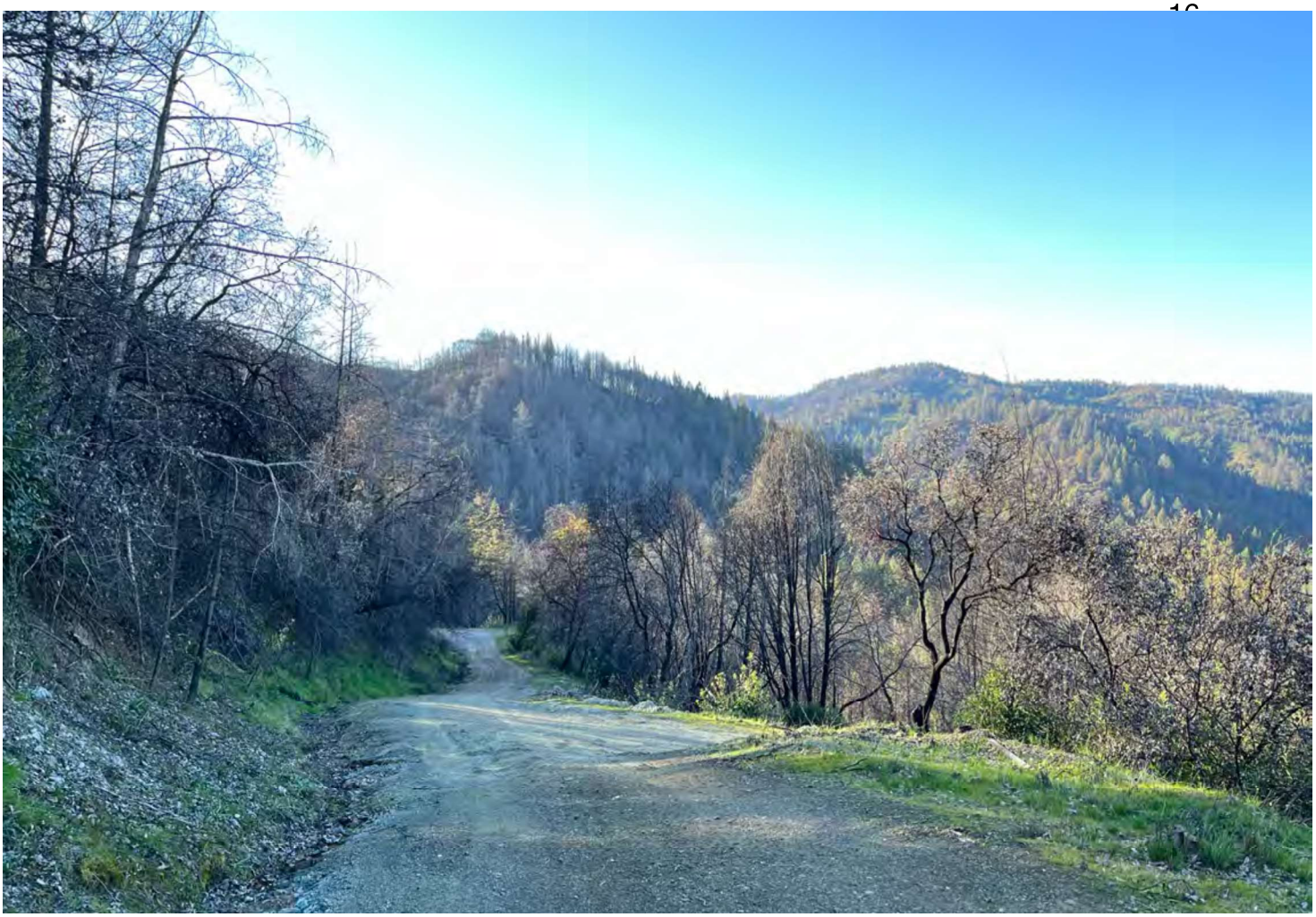


Fig 17. Adjacent Parcels Driveway looking North toward Sweetwater Springs Road

Fig 17. Adjacent Parcels Driveway looking North toward Sweetwater Springs Road

Fig 18. Adjacent Parcels Driveway looking South toward Palmer Creek Road Road

Fig 19. Adjacent Parcels Driveway looking North toward Sweetwater Springs Road

Appendix C

Existing Alternate Emergency Evacuation Route

An alternate emergency evacuation route currently exists which traverses APN # 110-060-069 and is located at the intersection of Palmer Creek Road & Mill Creek Road. This alternate emergency evacuation route is well documented and clearly described within the attached map “Mill Creek Pre Attack Map”. This route provides an alternate emergency evacuation so that Mill Creek Road is not a dead end. The route has existed for several years and is maintained in very good condition. The route is maintained by the parcel owner and the volunteer group know as COPE.

The applicant continues to offer assistance in the maintenance of the existing alternate emergency evacuation route which traverses APN# 110-060-069 over the Max parcel. Figures 20-23 Show the Alternate Emergency Evacuation Route & The Mill Creek Pre Attack Map.

Fig 20. Sign of Alternate Emergency Evacuation Route on MIll Creek Rd. @ Palmer Creek Rd.

Fig 21. Entry Gate into Alternate Emergency Evacuation Route on Palmer Creek Rd.

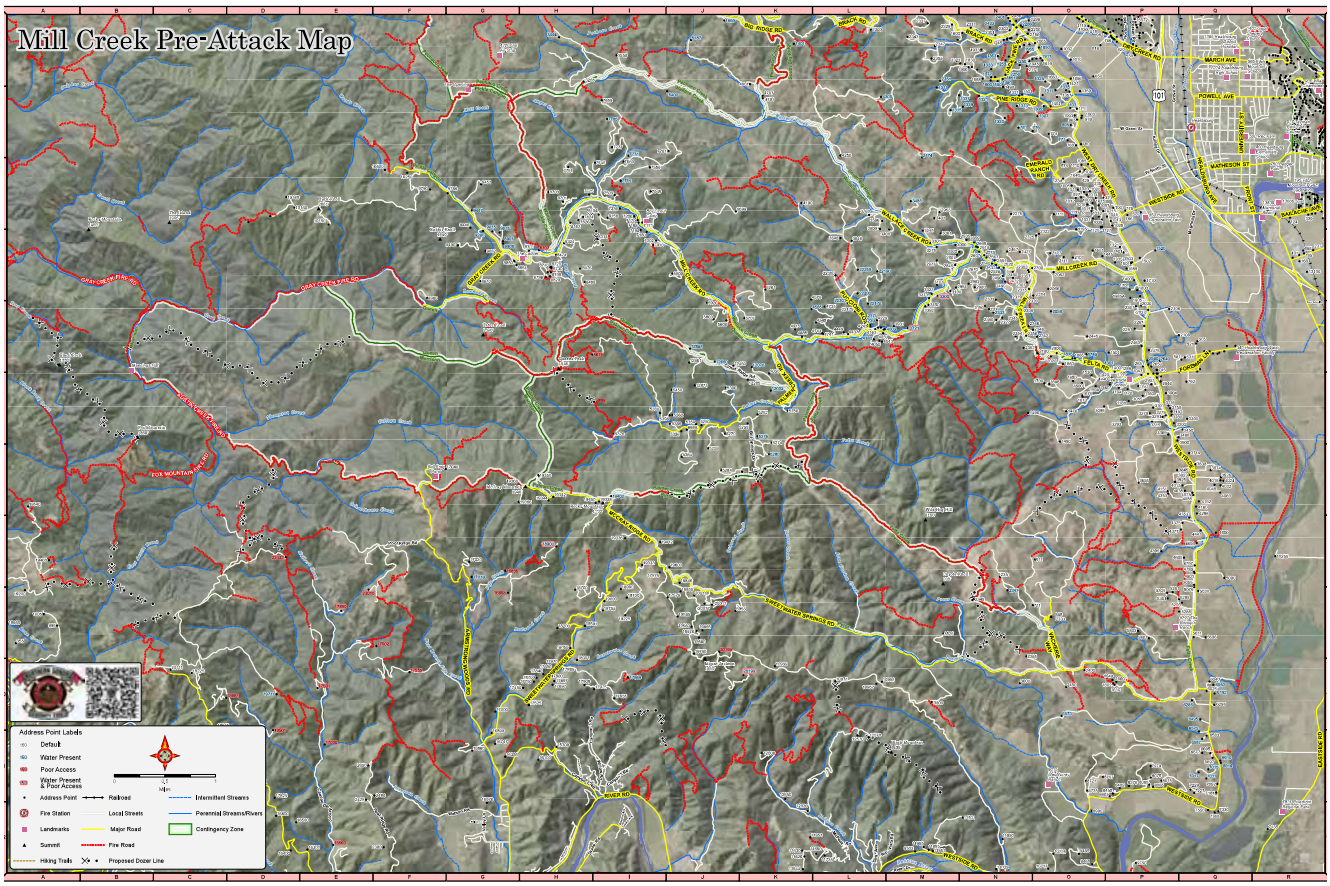


Fig 22.Northern Fire Distric Mill Creek Pre Attack Map

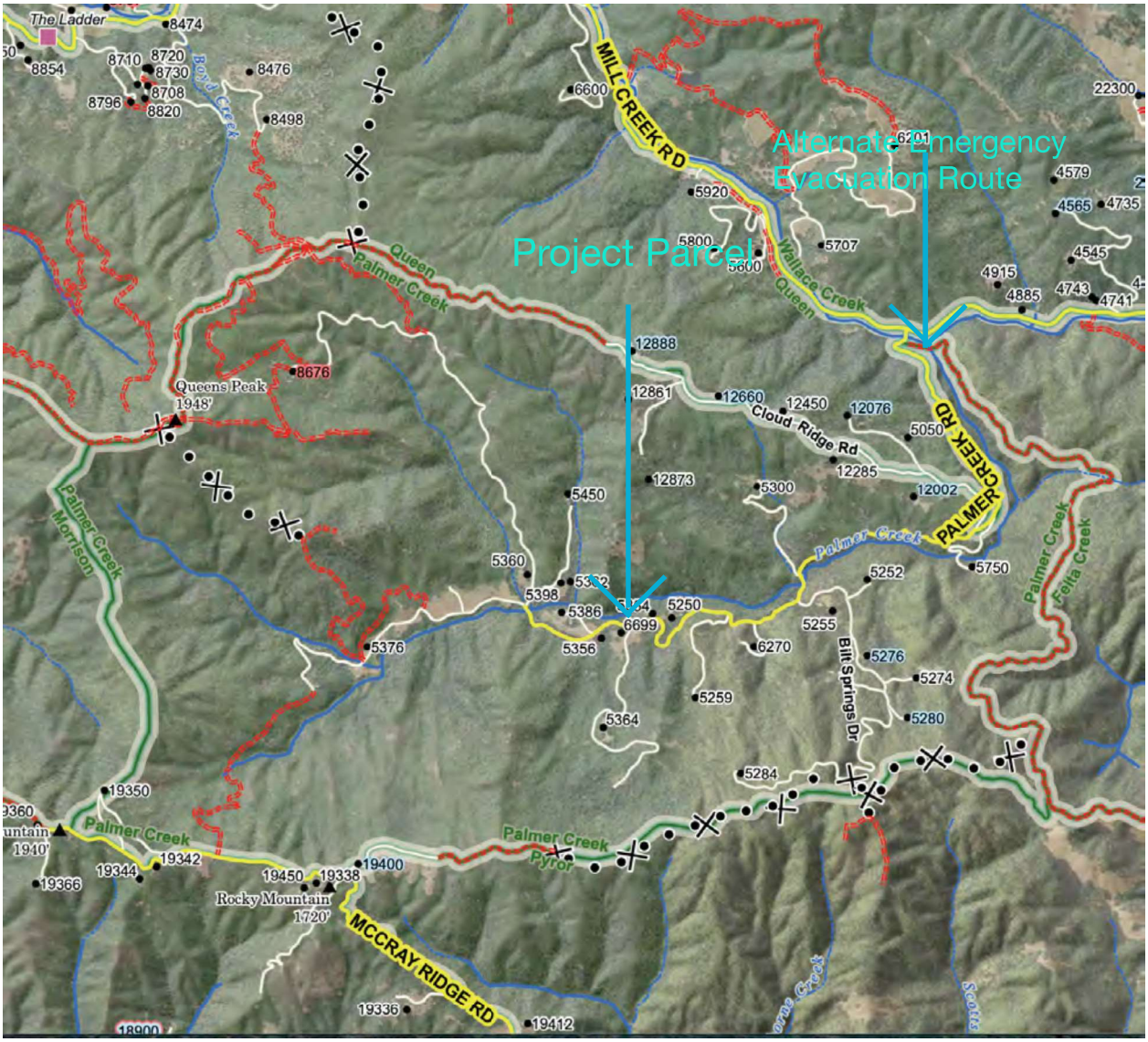
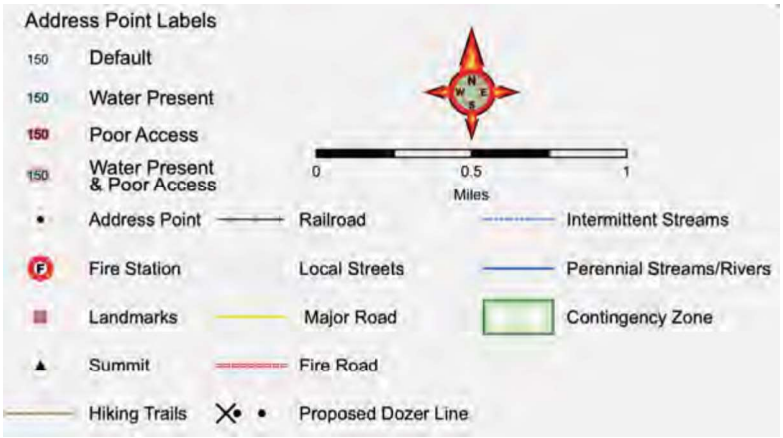


Fig 23 - **MILL CREEK PRE-ATTACK MAP**



Appendix D

Water Storage Description

Description of Project Water Storage and Fire Suppression Use

The project proposes two primary water storage features: a 97,000-gallon water storage tank and a 782,907.5-gallon reservoir connected to the tank with a gravity outfall. The primary use of these two features is for irrigation water storage; however, the entire system will be accessible to emergency responders both directly and via multiple proposed hydrants.

The importance of these features for firefighting cannot be over emphasized. The project site is approximately 6.5 miles from the intersection of Mill Creek Road and Westside Road; and 7 miles from the nearest municipal hydrant at the Healdsburg Corporation Yard. The normal driving time from the Healdsburg Corporation Yard to the Project Site is 20 minutes. The less trips that fire crews spend traveling, the more time can be spent on the direct firefighting effort.

Assuming an ICS Type 3 Wildland Fire Engine Model 34 with a tank storage volume of 500 gallons, a 500 gallon per minute primary pump, and a 180 gallon per minute auxiliary pump, a single fire truck could fight a fire for as little as 1 minute before needing to return for additional water. Based on a 100 gallon per minute average flow for a single 1.5-inch fire hose, the maximum firefighting time would be 5 minutes before requiring additional water. The round trip to refill with water would take at least an hour when considering travel time, rigging and unrigging of equipment, and filling time. This would be likely be increased during emergent events. Under this scenario, a single fire truck could fight a fire between 1-5 minutes per hour.

The attached *Analysis of the First Two Years of Reservoir Use* in Appendix E demonstrates that under drought conditions, the reservoir is expected to reach its capacity and enter stabilized use within two years. (It is noted in the public records that Robert Pennington of Permit Sonoma has confirmed and verified the water analysis

during a zoom meeting with the project applicant and the applicant's entire team dated 11/5/2021.) Once stabilized during the second year, the overall water storage between the reservoir and main tank are estimated to have a minimum storage of approximately 250,000 gallons before being recharged by rainfall. These 250,000 gallons of storage are the minimum estimated water expected to be available for firefighting use at any given time.

Assuming the same single fire truck now has access to the project's proposed 250,000-gallon water storage, the truck can hook up to the project hydrants and fight continuously. Depending of the strategy, the same truck could firefight for 8.3 hours at maximum pumping of 500 gallons per minute, it could firefight for 23.2 hours utilizing multiple hoses with the auxiliary pump at 180 gallons per minute, or 41.7 hours at 100 gallons per minute limited by the flow rate of a 1.5-inch hose. The most likely scenario would be a sustained effort of approximately 150 gallons per minute, on average. This completely eliminates the need for travel, filling, and rigging for 28 hours. Under this scenario, a single truck can exhaust 250,000 gallons in 28 hours vs 14,000 gallons for a traveling truck. A single truck can accomplish as much as 18 trucks needing to travel for water.

By creating these firefighting assets, the project has the potential to save lives and the property of the neighboring area. Furthermore, these assets act as force multipliers for emergency responders, allowing smaller crews to fight more efficiently and freeing up personnel, water tenders, and other resources for efforts elsewhere. This water source permits for multi-day sustained firefighting, creating a safe harbor area for fire crews to safely fight from and helping crews to better outpace the head of the fire. Overall, the proposed water features create more time fighting fires, less time on the road, and greater safety for everyone involved, all allowing for the same or improved effect of wider through roads. Figures 24-28 show similar ponds, the actual steel water tank, and a Type 3 Wildland Fire Truck Data Sheet.

Fig 24. Pond similar to the project proposed Pond

Fig 25. Pond similar to the project proposed Pond

Fig 26. Pioneer Water Tanks Model XLE 50/03 with 97,148-Gallons Capacity

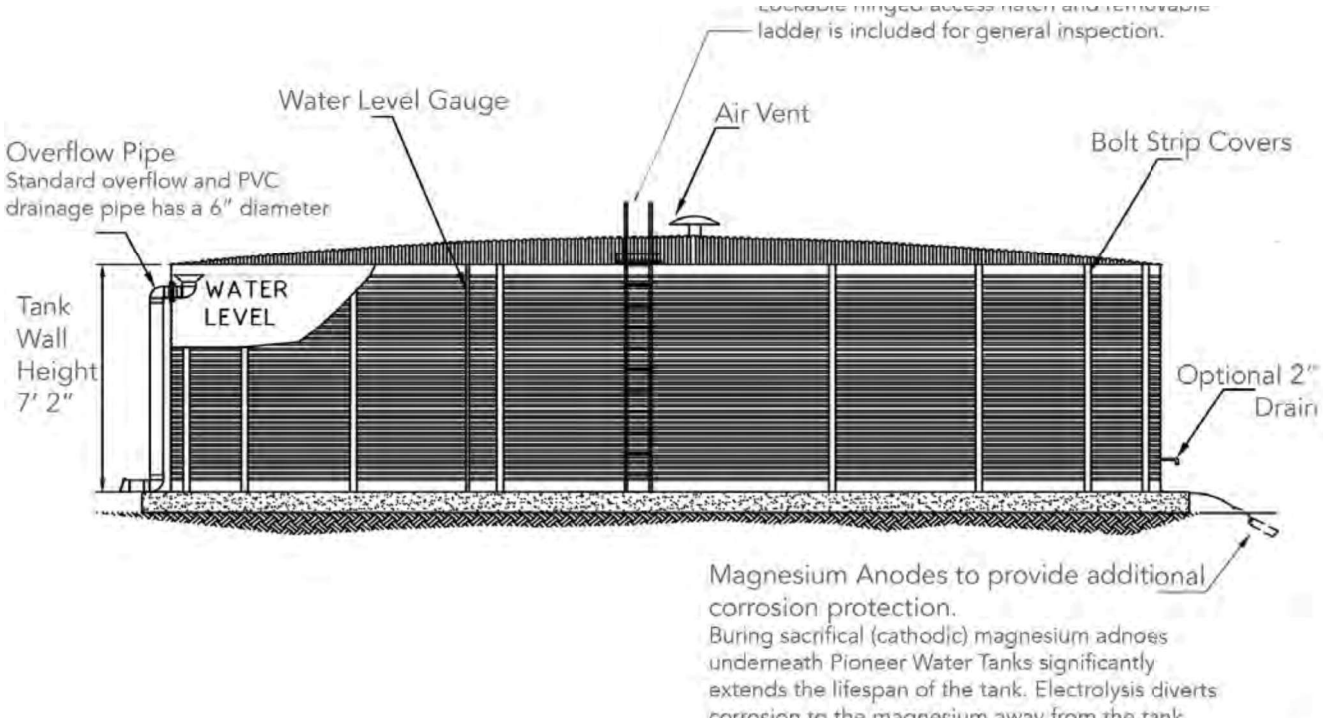


Fig 27. Pioneer Water Tanks Model XLE 50/03 with 97,148 Gallons Capacity

California Department of Forestry & Fire Protection

CAL FIRE ENGINE - MODEL'S 34 - 35

USE

The Model 34 and 35 engines are ICS Type 3 wild-land fire engines which are enhanced versions of the CAL FIRE Model 14 and 15 engines. The Model 34 is four-wheel drive, and the Model 35 is two-wheel drive. To date there have been 54 Model 34's and 8 Model 35 engines delivered to the frontlines. For the forseeable future, CAL FIRE has determinted that a four-wheel drive Type 3 engine will fulfill its mission.

CREW

Seating for five personnel

CAPABILITIES

Booster Tank:	500 gallons
Fire Pump:	2-stage, 500 gpm, PTO drive
Auxilliary Fire Pump:	180 gpm

MANUFACTURERS

Chassis:	Navistar
Body:	Placer Fire Equipment Rosenbauer/HME

SPECIFICATIONS

Gross Vehicle Weight:	35,000 lbs.
Engine:	Navistar DT 570,
Gross Axle Weights:	12,000 lbs. front; 23,000 lbs. rear
Transmission:	Allison Automatic EVS 3000 (4WD) EVS 3500 (2WD)
Wheel Base:	4WD: 175" or 180" 2WD: 167"

www.fire.ca.gov
January 2008

Fig 28. Cal Fire Engine Model 34-35 ICS Type 3 Wild-land Fire Engine

Appendix E
Water Analysis

MEMORANDUM

DATE:	September 21, 2021	**JOB #:** 20-2822
PROJECT:	Evergreen Acres, LLC 6699 Palmer Creek Road Healdsburg, CA 95448 APN 069-040-026	
PREPARED BY:	Matthew Machi, PE EBA Engineering 825 Sonoma Ave. Santa Rosa, CA 95404 (707) 544-0784	
OWNER:	Thomas Planson 6699 Palmer Creek Road Healdsburg, CA 95448	
SUBJECT:	Analysis of First 2 Years of Reservoir Use	

Caption

This analysis is intended as an addendum to the original project Irrigation Water Supply Assessment dated October 10, 2018. This analysis is in review of the off-stream reservoir performance through the first two years when the reservoir has stabilized. This addendum uses the same assumptions as the original assessment, with the following additional assumptions:

1. The pond characteristics have been updated to match the construction level grading design. The pond remains in the same footprint and overall volume of 2.3 acres. The new reservoir characteristics are as follows:

Pond Characteristics		
Storage Volume (gal)	Depth (ft)	Water Surface Area (sf)
0	0	7,806
62,126	1	8,804
129,570	2	9,228
201,398	3	9,976
278,919	4	10,750
362,319	5	11,548
451,786	6	12,372
547,510	7	13,221
649,679	8	14,095
756,786	8.5	14,541

2. The runoff area has been increased from 53,393 sf to 55,288 sf based on the construction level topographic survey. The Runoff Coefficient remains at the original 0.45.
3. The project residence will not be built within the first two years, however the water tank will, which was not included in the 2018 assessment.
4. Cultivation irrigation use will not begin until the first growing season in May of 2022.
5. The following assessment begins with an empty reservoir, showing initial filling through stabilized volume. This assessment assumes consecutive drought years to be conservative.
6. This assessment adds the proposed 97,000-gallon water storage tank to the study, which has negligible evaporation and fills prior to the filling of the pond.

Caption

First 2 Years Pond Balance								
	(1)	(2)	(3)	(4)	(5)		(6)	(7)
Month	Irrigation Water Use (Gallons)	Runoff Inflow (Gallons)	Pond Evaporation (Gallons)	Pond Volume (Gal)	Pond Depth (ft)	Water Surface Area (sf)	Tank Volume (Gal)	Total Stored Volume (Gal)
Dec 1, 2021				0	0.0	0	0	0
Dec 2021	0	166709	0					
Jan 1, 2022				69709	1.1	8852	97000	166709
Jan 2022	0	222108	6373					
Feb 1, 2022				285444	4.1	10812	97000	382444
Feb 2022	0	206976	11418					
Mar 1, 2022				481003	6.3	12631	97000	578003
Mar 2022	0	167735	22433					
Apr 1, 2022				626305	7.8	13895	97000	723305
Apr 2022	0	57451	36683					
May 1, 2022				647073	8.0	14073	97000	744073
May 2022	36000	0	49716					
Jun 1, 2022				561357	7.1	13339	97000	658357
Jun 2022	64000	0	54937					
Jul 1, 2022				442420	5.9	12286	97000	539420
Jul 2022	84000	0	55492					
Aug 1, 2022				302927	4.3	10980	97000	399927
Aug 2022	84000	0	43743					
Sep 1, 2022				175184	2.6	9703	97000	272184
Sep 2022	69000	0	30599					
Oct 1, 2022				75585	1.2	8889	97000	172585
Oct 2022	44000	54629	18645					
Nov 1, 2022				67569	1.1	8838	97000	164569
Nov 2022	29000	154399	9036					
Dec 1, 2022				183932	2.8	9794	97000	280932
Dec 2022	29000	166709	4701					
Jan 1, 2023				316940	4.5	11114	97000	413940
Jan 2023	29000	222108	8002					
Feb 1, 2023				502046	6.5	12818	97000	599046
Feb 2023	29000	206976	13536					
Mar 1, 2023				666487	8.1	14165	97000	763487
Mar 2023	29000	167735	25157					
Apr 1, 2023				756786	8.5	14541	97000	853786
Apr 2023	29000	57451	38388					
May 1, 2023				746848	8.5	14500	97000	843848
May 2023	36000	0	51224					
Jun 1, 2023				659624	8.0	14136	97000	756624
Jun 2023	64000	0	58219					
Jul 1, 2023				537404	6.9	13131	97000	634404
Jul 2023	84000	0	59312					
Aug 1, 2023				394092	5.4	11841	97000	491092
Aug 2023	84000	0	47173					
Sep 1, 2023				262919	3.8	10590	97000	359919
Sep 2023	69000	0	33397					
Oct 1, 2023				160522	2.4	9550	97000	257522
Oct 2023	44000	54629	20033					
Totals	**936000**	**1905617**	**698219**					

Caption

Assuming that drought level rainfall is the limit of water inflow for the first two years, the overall water storage is estimated to have 164,589-gallons (approximately 6 months of reserve use) in surplus in the first year and stabilized with 257,522-gallons (approximately 8 months reserve use) in future years. The reservoir is expected to perform as required within the proposed construction schedule.

Please feel free to contact Matthew Machi of EBA Engineering at mmachi@ebagroup.com or (707) 544-0784, with any questions that you may have.

Very Respectfully,

Matthew Machi, P.E. 83663
Senior Engineer – Project Manager

Caption

Appendix F

Fire Analysis Report

Fire Analysis Report – 02/06/22 (Revision 3)

6699 Palmer Creek Road, Healdsburg – Cannabis Cultivation Proposal

1 – SONOMA COUNTY PROJECT BACKGROUND INFORMATION

File Number UPC-18-0046

Parcel Number 069-040-026

Zoning RRD B6 160 BH RC50/50

Planning area: 3-Healdsburg

2 - CODE

This report has been prepared by H&S Associates, Fire Code Consultants, to provide our recommendations summary of the proposed project at 6699 Palmer Creek Rd.

CODES AND STANDARDS

The following is a summary of applicable codes and standards for this project.

- 2019 California Fire Code
- 2019 Sonoma County Fire Code Ordinance
- Sec. 13-62. - Alternate fire protection measures. When authorized, pursuant to Section 13-23, any of the following alternate fire protection measures may be used as exceptions to the standards specified in this article if determined to have the same practical effect. The county fire warden/fire marshal may request additional fire protection measures pursuant to Section 13-63(a) through (c).
- 1. Increased emergency water supply requirements; and
- 2. Installation of a sprinkler system that meets the requirements of the National Fire Protection Association and any one (1) of the following:
- a) Increased flammable vegetation clearance areas for buildings;
- b) Increased flammable vegetation clearance areas for roads and driveways;
- c) Use of fire-resistive vegetation;
- d) Installation of fire-resistive exterior siding;
- e) Use of fire-resistive deck and eave construction;
- f) Construction of additional turnouts and turnarounds;
- g) Creation of areas of safe refuge;
- h) Installation of a centrally monitored fire alarm system;
- i) Provision of a secondary means of ingress and egress to the parcel; and
- j) Increased width and surface for emergency vehicle access.

NOTED CONDITIONS

Except for road width, the proposed site will be in compliance with the Sonoma County Fire Safety Ordinance and the Board of Forestry, Title 14, Fire Safe Regulations, Vegetation Management standards, and additionally will provide all the alternate fire protection measures listed in Section 13-23.

- The irrigation pond, (747,948-gallon capacity) and main tank, (97,000-gal capacity are used for irrigation. The overall water storage between the reservoir and main tank are estimated to have a minimum storage of approximately 250,000 gallons. This 250,000 gallons of storage is the minimum estimated water expected to be available for fire fighting use at any given time and will provide increased emergency water supply.

- The site will have greenhouses with no extraction, processing, or onsite storage as the greenhouse building will provide Increased flammable vegetation clearance areas and incorporate fire monitoring and sprinklers.

- The proposed residence will have its own 5000 gallons storage tank with wharf hydrant connection following all fire safe standards, utilize fire-resistive siding, utilize fire-resistive decking & eave construction, sprinkler systems, fire alarm systems, and provide Increased flammable vegetation clearance areas.

- The project site plan proposes to include multiple turnarounds and turnouts on the parcel around the barn, greenhouse, residence, and outdoor cultivation area.

- The project proposes multiple areas of safe refuge

- The project proposes the installation of centrally monitored fire alarm systems.

- The proposed site will implement fire- resistive vegetation throughout the parcel.

- The proposed site has shown in all documentation that they will meet all fire standards.

- The 97,000-gallon storage tank will have 4-5 wharf hydrants connected in multiple locations throughout the parcel and surrounding areas of Palmer Creek Road for fire fighting use.

- The project will have their own secondary egress route for self and employees.

CONCLUSION

The above Fire Code Analysis Narrative presents a level outline of the key requirements for the facility. The applicant has provided the evidence of all the fire service features for buildings, structures and premises that comply with 2019 Sonoma County Fire Code Ordinance and additionally will provide all Section 13-23 alternate fire protection measures. Regarding the existing secondary egress from the applicant's parcel out to Sweetwater Springs Road, I have personally driven the road in its entirety and can certify that it is in good condition and can act as a viable alternate emergency evacuation route if the need arises. The applicant has done an amazing job during his permitted tree harvest operations and in doing so has greatly improved the condition of this secondary egress.

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