



# County of San Diego

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County of San Diego  
Planning & Development Services  
5510 Overland Ave., Suite 321  
San Diego, CA 92123

Attn: Bronwyn Brown, Project Manager

RE: **MPA17-016 JRV Solar**  
San Diego County Fire Authority  
Multiple APNs  
**Preliminary Comments**

Please accept the following County Fire Marshal's Office comments regarding the proposed project based on the limited documents available to us today; therefore the comments are preliminary in nature. More concise requirements will be offered as more detailed submittals become available.

**The following will be required for the proposed project:**

## **FIRE PROTECTION PLAN**

A Fire Protection Plan—Full Report shall be provided and be formatted per the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements—Wildland Fire and Fire Protection. The report should include discussion of how the project will comply with section 605.11.4 of the County Consolidated Fire Code. For your reference, section 605.11.4 is provided below with comments.

***Sec. 605.11.4 Ground-mounted photovoltaic arrays.*** *Ground-mounted photovoltaic array installations shall meet the requirements of sections 605.11.4.1 through 605.11.4.4.*

***Sec. 605.11.4.1 Fire apparatus access roads.*** *Fire apparatus access roads to ground-mounted photovoltaic arrays, associated equipment structures and operations/maintenance buildings shall comply with section 503.*

- Access roads shall extend to within 150 of all portions of buildings and equipment shelters and within 300 feet of all portions of the arrays.
- Add additional north-south fire apparatus access roads such that there is not more than approximately 1,000 feet between intersecting access roads.

**Sec. 605.11.4.1.1 Perimeter fire apparatus access roadway.** *Ground-mounted photovoltaic arrays 10 acres or larger in size shall provide a fire apparatus access roadway around the perimeter of the project. The perimeter fire apparatus access roadway shall comply with section 503.*

- The perimeter access road shall be 24 feet in width, and there shall be pedestrian/man gates approximately every 750 feet along perimeter fences to enable firing operations.

**Sec. 605.11.4.2 Fuel modification.** *Combustible vegetation within the array and to a distance of 30 feet from the array and associated equipment shall be reduced to a height of no more than 6 inches. The fuel modification zone may be increased when required by the fire code official or as recommend by a fire protection plan.*

*Operation/maintenance buildings shall be provided with fuel modification zones that comply with section 4907.2.*

**Sec. 605.11.4.3 Water supply.** *Water supply for fire protection and suppression shall be provided for equipment structures and operations/maintenance buildings as required by section 507.*

- Multiple water storage tanks will be required. The size and locations will be determined when a more detailed plan is submitted.

**Sec. 605.11.4.4 Identification.** *Ground-mounted photovoltaic arrays with multiple equipment structures shall include a means of readily identifying each equipment structure. The fire code official may require a lighted directory map of the project to be installed on-site near the entrance to the facility for projects of 10 or more acres in size.*

## **TECHNICAL REPORT**

As an appendix to the fire protection plan, a detailed technical report prepared by a qualified engineer, specialist, or fire safety specialty organization needs to be submitted for the proposed project. The technical report needs to address—but is not limited to—the following items:

- Hazards of the proposed facilities to emergency responders.
- Discussion on how to properly de-energize equipment.
- Signage recommendations (provide figures for each):
  - At each disconnecting means depicting what equipment it de-energizes.
  - Each inverter structure is to be numbered and signed (To be visible from at least 1,000 feet)
  - Lighted directory at the main entrances depicting the overall site plan and the locations of each numbered inverter structure (show location on plot plan).
- Recommended training for emergency personnel. Training will be provided prior to commissioning and on an as requested basis.

**IMPACT TO EMERGENCY SERVICES**

This project, along with all other development, has a cumulative impact on the emergency services for this community. To mitigate for this impact, the project will be conditioned to enter into a Developer Agreement with the SDCFA.

Please call or email me if you have any questions or need clarification – (858) 495-5434 or [James.Pine@sdcounty.ca.gov](mailto:James.Pine@sdcounty.ca.gov).

Best regards,



James Pine, Assistant Fire Marshal  
San Diego County Fire Authority  
Public Safety Group