

To: California Building Standards Commission <cbssc@dgs.ca.gov>

Subject: Public Comment on California Fire Code California Code of Regulations, Title 24, Part 9, Amendments: Recommendations to Enhance Safety for Non-Car Users

Dear State Fire Marshal and CBSC Officials,

Public Comment on California Fire Code California Code of Regulations, Title 24, Part 9

Amendments: Recommendations to Enhance Safety for Non-Car Users

We are writing to provide detailed comments and recommendations on the current California Fire Code and its alignment with traffic safety, particularly focusing on the mobility and safety of non-car users—pedestrians, cyclists, and people using wheelchairs. The following recommendations address the specific deficiencies in the fire code and propose revisions that can significantly enhance safety while maintaining the primary purpose of providing fire apparatus access. As California's population continues to embrace more sustainable, active forms of transportation, it is crucial that the fire code evolves to ensure the safety of all road users, not just those in motor vehicles.

California's many fire departments are first responders for traffic injuries and fatalities. Designing safer streets will decrease the number of tragic traffic collisions to which fire departments now respond.

Background: Fire Code and Its Impact on Traffic Safety

California Fire Code is based in part on the International Fire Code (IFC), with California amendments. Local jurisdictions have the ability to amend the California Fire Code.

There are two sections of the International fire code which specify requirements for Fire Apparatus Access Roads, which determine how roads are designed and used:

1. Section 503 of the International Fire Code
2. Appendix D, which specifies additional requirements for access roads

However, the state of California has only adopted minimal portions of section 503, in Title 19, section 3.05. California does not adopt Appendix D but leaves it as an optional appendix. Many local jurisdictions amend California's fire code on access roads. Many jurisdictions adopt Appendix D. Additionally, local jurisdictions interpret these sections. These local decisions have led to wider roads and the frequent denial of traffic calming measures, with serious consequences for non-car road users.

Key Deficiencies

1. 20 feet width: California Title 19, section 3.05 (as well as CA unadopted International code Section 503.2.1) mandates an access road width of 20 feet, which often leads to wider streets. However, wider roads are associated with faster traffic and increased risk of severe injuries and fatalities for pedestrians, cyclists, and people using wheelchairs.
2. International Fire Code Section 503.2.2 (not adopted by the state of California, but often used by local jurisdictions) allows fire officials to modify access widths. However, this is often used to require wider, rather than narrower, streets. This authority could instead be leveraged to reduce street widths for the purpose of traffic calming and improving pedestrian safety.
3. International Fire Code Section 503.4.1 (not adopted by the state of California) prohibits traffic calming devices unless approved by fire officials. This is counterproductive because traffic injuries and fatalities are far more common than fire-related injuries, and the presence of traffic calming devices can reduce overall emergency response needs by preventing collisions in the first place.
4. International Fire Code Appendix D (optional in the state of California, but adopted by many local jurisdictions) sets requirements for roads to be 26 feet wide near fire hydrants and taller buildings. Wider roads increase the likelihood of speeding, which disproportionately affects vulnerable road users such as children, the elderly, and people with disabilities.

Recommendations: Aligning the Fire Code with Traffic Safety Goals

To address these deficiencies and enhance safety for non-car road users while still maintaining fire safety standards, we propose the following concrete revisions to the California Fire Code:

Limit the Width of Fire Apparatus Access Roads to Promote Traffic Calming (CA Title 19, Section 3.05, International Section 503.2.1)

Current Problem

The requirement of a minimum 20-foot width for fire apparatus access roads often results in excessively wide streets, leading to increased vehicle speeds and more dangerous conditions for non-car road users. These wide streets discourage walking and cycling and undermine traffic safety measures designed to protect vulnerable road users.

Proposed Revision

Amend CA Title 19, Section 3.05, International Section 503.2.1 to specify that narrower streets can be permitted if they enhance public safety, including the safety of non-car users. For example, streets in residential areas or school zones should be allowed to have narrower widths (e.g., 14–16 feet), provided that fire apparatus access is not hindered. This narrower width would still allow fire apparatus to respond effectively while reducing traffic speeds, thereby improving safety for pedestrians and cyclists. Street width shall include mountable curbs, pliable pylons and other traffic calming devices.

Encourage the Use of Smaller, More Maneuverable Fire Vehicles (CA Title 19, 3.05, International Section 503.2.4 and 503.2.7)

Current Problem

International Fire Code Section 503.2.4 and 503.2.7 (not adopted by California) specifies turning radius and grade for streets dependent upon fire vehicles. Though these sections are not adopted by the state of California, many local jurisdictions use their guidance to design streets around fire vehicles. The fire code places the burden on street design to accommodate large fire vehicles, which results in wider streets, larger turning radii, and the elimination of traffic-calming devices. This is problematic because it does not incentivize fire departments to adopt more maneuverable and efficient vehicles.

Proposed Revision

The California Fire Code should choose fire vehicles based upon safe streets which are in cities. Amend CA Title 24 to encourage fire departments to procure smaller, more maneuverable vehicles that are better suited to urban environments with narrow, traffic-calmed streets. This

shift in vehicle procurement could reduce the need for excessively wide streets and promote safer road designs that protect non-car users. This recommendation aligns with public safety goals, as smaller, more agile fire apparatus can respond more effectively in densely populated areas while reducing the negative impact of large vehicle requirements on road design.

Permit the Installation of Traffic Calming Devices

Current Problem

International Fire Code Section 503.4.1 prohibits traffic calming devices unless approved by the fire code official. Though this section is not adopted by the state of California, many local jurisdictions are guided by this section. Traffic calming devices such as speed bumps, raised crosswalks, and road narrowing are essential tools for reducing traffic speeds and improving pedestrian and cyclist safety. However, International Section Code 503.4.1 prohibits these devices unless specifically approved by fire officials, who may prioritize access for fire vehicles over the benefits of traffic calming.

Proposed Revision

Revise CA Title 24, to explicitly permit traffic calming devices, with the condition that they do not excessively hinder emergency response times. This revision would shift the default position from prohibiting these devices to allowing them unless there is a compelling reason to prohibit them. Studies have shown that the modest delays caused by traffic calming devices (typically seconds) are outweighed by the reduction in traffic injuries and fatalities. Fire departments can still retain the authority to deny traffic calming measures on a case-by-case basis but should consider the broader public safety benefits of these interventions.

Modify Appendix D to Reduce Street Widths and Increase Safety near Fire Hydrants and Tall Buildings

Current Problem

Appendix D, Fire Apparatus Access Roads, is not adopted by the state of California. However, Appendix D is an optional appendix which is adopted by many local jurisdictions. Since Appendix D is widely adopted throughout California, the State Fire Marshal should make amendments to this optional appendix to increase safety. Local jurisdictions maintain the ability to remove the state's amendments to Appendix D. However, it is better to start with code which increases traffic safety.

Appendix D mandates a 26-foot width for streets near fire hydrants and taller buildings, which creates an excessively wide road environment. These wider roads lead to faster vehicle speeds and increased danger for non-car users.

Proposed Revision

Amend Appendix D to reduce the required street width near fire hydrants and tall buildings. For example, rather than a blanket requirement of 26 feet, consider allowing streets to be 20 feet wide in areas with slower speed limits, traffic-calming measures, and alternative firefighting strategies such as the use of sprinklers and smaller, more maneuverable fire vehicles.

Additionally, fire departments should collaborate with urban planners to explore innovative designs that allow fire access while preserving pedestrian and cyclist safety. Street width near tall buildings may include the width of pedestrian areas which are designed to allow a ladder truck to be deployed.

Also amend CA Title 24 so that street width near tall buildings may include the width of pedestrian areas which are designed to allow a ladder truck to be deployed.

Incorporate Complete Streets and Vision Zero Principles into the Fire Code

Current Problem

The fire code currently focuses on vehicle access, often at the expense of pedestrian and cyclist safety. This imbalance contributes to street designs that prioritize cars over people, resulting in a higher risk of traffic-related injuries and fatalities.

Proposed Revision

Incorporate language into the fire code that aligns with Complete Streets and Vision Zero principles. This could include directives for fire marshals and urban planners to work together to ensure that streets are designed for all users, not just motor vehicles. For example, fire apparatus access roads should be designed to accommodate pedestrians, cyclists, and people with disabilities while maintaining sufficient emergency vehicle access. The fire code should also encourage fire officials to prioritize the reduction of traffic injuries and fatalities as a core public safety objective, equal to the goal of fire prevention and response. Street width near tall buildings may include the width of pedestrian areas which are designed to allow a ladder truck to be deployed.

Street width shall include mountable curbs, pliable pylons and other traffic calming devices.

Conclusion: Aligning Fire Safety with Comprehensive Public Safety Goals

The California Fire Code plays a crucial role in public safety, but its current provisions related to access roads often create unintended consequences for non-car users. By amending the code to limit street widths, allow traffic calming devices, and encourage the use of smaller fire vehicles, we can create safer streets for all Californians. These changes will not compromise fire safety but will instead support a broader vision of public safety that includes protection from traffic violence. We urge you to consider these revisions and to work with transportation and urban planning experts to ensure that our fire code serves the needs of all road users.

Sincerely,

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