

COUNTY OF NEVADA  
STATE OF CALIFORNIA  
BOARD OF SUPERVISORS



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Julie Patterson Hunter,  
Clerk of the Board

June 8, 2021

Board of Forestry and Fire Protection  
Attn: Edith Hannigan  
Land Use Planning Program Manager  
PO Box 944246  
Sacramento, CA 94244-2460

**RE: Comments re. “State Minimum Fire Safe Regulations, 2021”**

Board of Forestry and Fire Protection and Ms. Hannigan,

On behalf of the County of Nevada, we are submitting this letter regarding the Notice of Proposed Action titled “State Minimum Fire Safe Regulations, 2021.” While the County of Nevada appreciates the Board of Forestry and Fire Protection’s previous responsiveness to many of our staff’s previous comments, we have several significant concerns that we request be addressed including:

- Proposed definition of “Access” from a Building to a Collector Road. The issue is that this definition is too restrictive as most roads in Nevada County are not collectors but rather local roads. This could result in significant costs to improve local roads from a property to a Collector road.
- Proposed definition of Dead-end Road which includes all looped roads. This is not correct as some looped roads connect to different roads on each end. As proposed, this definition could result in increased costs to develop and/or inability to develop certain parcels off of looped roads.
- Proposed definition of Driveway that does not include commercial and industrial sites. As proposed, commercial and industrial buildings could only be served by a Road which is more costly to construct and requires more property than a driveway.
- Proposed exemption to the standards for only wildfires when other disasters should also be included.
- Proposed lowering of acceptable road and driveway grades to a 20% slope, versus the current 25% slope. This could result in several parcels in Nevada County being unbuildable since we currently allow 25% slope driveways where an exception is necessary.

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A detailed list of our comments is enclosed as Attachment A to this letter and includes minor suggested changes as well. If you have any questions, please contact our Public Works Director at (530) 265-1411 or via email at [Trisha.tillotson@co.nevada.ca.us](mailto:Trisha.tillotson@co.nevada.ca.us).

Sincerely,

Honorable Dan Miller  
Board of Supervisors, Chair

Copied:

Senator Brian Dahle  
Assemblywomen Megan Dahle  
Secretary Wade Crowfoot, California Natural Resources Agency  
Catherine Freeman, California State Association of Counties (CSAC)  
Staci Heaton, Rural County Representatives of California (RCRC)  
Karen Lange, Shaw, Yoder, Antiwh, Schmelzer & Lange