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DEPARTMENT OF
FINANCE

FINANCE ADMINISTRATION

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CALIFORNIA

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May 31, 2005

Law and Legislative Committee
Sacramento, California

Honorable Members in Session:

SUBJECT Senate Bill 516 relating to Fire Protection: Residential Care Facility for the Elderly

LOCATION/COUNCIL DISTRICT Citywide

RECOMMENDATION

Staff recommends that the Law and Legislation Committee support SB 516 relating to fire protection at residential care facilities for the elderly.

CONTACT PERSONS Tina Lee-Vogt, Legislative Affairs Analyst - 808-2679

FOR COMMITTEE MEETING OF June 7, 2005

SUMMARY

This report recommends that the Law and Legislation Committee support SB 516 relating to fire protection at residential care facilities for the elderly.

BACKGROUND

Existing law, prohibits a person, firm, or corporation from establishing, maintaining, or operating any hospital or other specified care facility for more than six guests or patients, and prohibits the operation of a residential care facility for the elderly licensed to care for more than six persons, unless it has, among other things, an automatic fire

to care for more than six persons, unless it has, among other things, an automatic fire sprinkler or extinguishing system approved by the State Fire Marshal. Existing law places responsibility for enforcing State Fire Marshal building standards upon prescribed local agencies and provides for the assessment of related inspection fees. Violation of provisions related to fire protection requirements is a crime.

In December of 2002, a fire at the Anchor Guest Home, a residential care facility in the City of Torrance, killed three residents who perished trying to evacuate. All three were non-ambulatory making evacuation nearly impossible. The home had recently been inspected for compliance to all safety requirements; however, the facility was not equipped with an automatic fire sprinkler. Although it had additional safeguards including direct secondary exiting from the rooms, the elderly citizens perished from the rapid and unchecked early spread of fire and smoke. Torrance fire investigators are convinced that sprinklers could have doused the blaze at its origin or at least slowed the rapid spread of flames and smoke, providing more time for residents to escape.

According to the National Fire Protection Association, there is no record of a fire killing more than two people in a completely fire sprinkled building where the system was properly maintained. It is estimated that residential fires account for more than 78% of all deaths from fires.

SB 516 would require residential care facilities for the elderly that house or care for no more than 6 clients or residents, to have an approved, operable automatic fire sprinkler system on and after January 1, 2013, if they are licensed as of January 1, 2009. The bill would require every facility for which a license is newly issued on or after January 1, 2009, to have an approved, operable automatic fire sprinkler system on and after the date of issuance. The bill would require the State Fire Marshal to adopt regulations to implement these provisions by January 1, 2007, including addressing those fire safety features no longer required of a licensee after an operable automatic fire sprinkler system has been installed and maintained. By changing the definition of a crime, this bill would impose a state-mandated local program.

Automatic fire sprinklers would provide residents the time needed to safely evacuate a building or to be protected in place while eliminating hostile and dangerous fire conditions firefighters would face in fire and rescue operations. While there are costs associated with installing fire sprinklers, the cost of losing a human life by fire is incalculable. For about \$2 per square foot, which is equivalent to the cost of new carpeting, tragedies like the fire at the Anchor Guest home, can be prevented. SB 516 will ensure the safety of all Californians that reside in these residential care facilities by providing a proven and cost effective life safety system.

The Fire Department has reviewed SB 516 and concurs with the staff recommendation to support this measure. SB 516 is supported by over fifty organizations including, but not limited to, the California Assisted Living Association, the County of Los Angeles, the Sacramento Metropolitan Fire District, the Elk Grove Community Services District, and the fire departments for Rancho Cordova and Roseville. The Community Residential

Care Association of California, the Association of California Care Home Operators, the Society of California Care Home Operators, and Protection and Advocacy, Inc. oppose this legislation.

FINANCIAL CONSIDERATIONS

By increasing the related duties of local fire safety and inspection agencies and by changing the definition of a crime, this bill would impose a state-mandated local program. Existing law provides for the assessment of related inspection fees.

ENVIRONMENTAL CONSIDERATIONS

None

POLICY CONSIDERATIONS

Staff recommends that the Law and Legislation Committee support SB 516. Adoption of sprinkler requirement is compatible with Sacramento's efforts to enhance and preserve the neighborhoods by providing the its most vulnerable residents with a safe environment.

ESBD EFFORTS

No goods or services are being purchased under this report.

Respectfully Submitted,



Tina Lee-Vogt
Legislative Affairs Analyst

RECOMMENDATION APPROVED:



KEN NISHIMOTO
Deputy City Manager

Attachments

- Letter of Support, page 4
- Senate Bill 516 - Bill Text, page 5
- Senate Bill 516 - Bill Analysis, page 9

June 7, 2005

Honorable Deborah Ortiz
California State Senate
State Capitol
Sacramento, CA 95814

Subject: Support: Senate Bill 516 relating to Fire Protection: Residential Facility for the Elderly

Dear Senator Ortiz:

On behalf of the City of Sacramento, I am pleased to express the City's support of Senate Bill 516 relating to fire protection for residential care facilities for the elderly. SB 516 will ensure the safety of Californians that reside in these residential care facilities by requiring the installation of fire sprinklers and providing a proven and cost effective life safety system.

Thank you for introducing this important fire safety legislation.

Sincerely,

LAUREN HAMMOND, Chair
Law and Legislation Committee

CC: Senator Dave Cox
Assembly Member Dave Jones
Assembly Member Alan Nakanishi
Assembly Member Roger Neillo
Mayor Fargo and Members of the City Council

AMENDED IN SENATE MAY 2, 2005
AMENDED IN SENATE APRIL 13, 2005
AMENDED IN SENATE MARCH 29, 2005

SENATE BILL

No. 516

Introduced by Senator Ortiz

February 18, 2005

An act to add Section 13113.6 to the Health and Safety Code, relating to fire protection.

LEGISLATIVE COUNSEL'S DIGEST

SB 516, as amended, Ortiz. Fire protection: residential care facility for the elderly.

Existing law establishes the State Fire Marshal within the Department of Forestry and Fire Protection and sets forth its duties, including, but not limited to, administering provisions relating to inspection and approval of fire protection measures for health and community care facilities.

Existing law, with certain exceptions, prohibits a person, firm, or corporation from establishing, maintaining, or operating any hospital or other specified care facility for more than 6 guests or patients, and prohibits the operation of a residential care facility for the elderly licensed to care for more than 6 persons, unless it has, among other things, an automatic fire sprinkler or extinguishing system approved by the State Fire Marshal. Existing law places responsibility for enforcing State Fire Marshal building standards upon prescribed local agencies and provides for the assessment of related inspection fees. Violation of provisions related to fire protection requirements is a crime.

This bill would require residential care facilities for the elderly that house or care for no more than 6 clients or residents, to have an approved, operable automatic fire sprinkler system on and after January 1, ~~2011~~ 2013, if they are licensed as of January 1, ~~2007~~ 2009. The bill would require every facility for which a license is newly issued on or after January 1, ~~2007~~ 2009, to have an approved, operable automatic fire sprinkler system on and after the date of issuance. The bill would require the State Fire Marshal to adopt regulations to implement these provisions by January 1, 2007, including addressing those fire safety features no longer required of a licensee after an operable automatic fire sprinkler system has been installed and maintained. By changing the definition of a crime, this bill would impose a state-mandated local program.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement is required by this act for a specified reason.

Vote: majority. Appropriation: no. Fiscal committee: yes.
State-mandated local program: yes.

The people of the State of California do enact as follows:

1 SECTION 1. Section 13113.6 is added to the Health and
2 Safety Code, to read:
3 13113.6. (a) As used in this section, “facility” means a
4 residential care facility for the elderly, as defined in subdivision
5 (k) of Section 1569.2.
6 (b) Every facility having a valid license as of January 1, ~~2007~~
7 2009, to house or care for no more than six clients or residents,
8 shall have installed and maintained on and after January 1, ~~2011~~
9 2013, an operable automatic fire sprinkler system approved by
10 the State Fire Marshal and meeting the NFPA 13D standard for
11 the installation of sprinkler systems in one and two family
12 dwellings and manufactured homes. ~~A local government shall not~~
13 ~~require a sprinkler system meeting a higher standard. A local~~
14 *jurisdiction shall not require a sprinkler system exceeding this*
15 *standard by amending the standard or applying standards other*
16 *than NFPA 13D.*

1 (c) Every facility for which a license is newly issued after
2 January 1, ~~2007~~ 2009, to house or care for no more than six
3 clients or residents shall have installed and maintained on and
4 after the date of issuance an operable automatic fire sprinkler
5 system approved by the State Fire Marshal and meeting the
6 NFPA 13D standard for the installation of sprinkler systems in
7 one and two family dwellings and manufactured homes. ~~A local~~
8 ~~government shall not require a sprinkler system meeting a higher~~
9 ~~standard. A local jurisdiction shall not require a sprinkler system~~
10 ~~exceeding this standard by amending the standard or applying~~
11 ~~standards other than NFPA 13D.~~

12 (d) By January 1, 2007, the State Fire Marshal shall adopt
13 regulations to implement this section, including addressing those
14 fire safety features no longer required of a licensee after an
15 operable automatic fire sprinkler system is installed and
16 maintained.

17 (e) A public or private water agency shall not interpret this
18 section as changing the status of a facility from a residence
19 entitled to residential water rates nor shall a new meter or larger
20 connection pipe be required of the facility.

21 (f) The fee imposed by a local fire marshal for plan review or
22 installation inspections of a fire sprinkler system required by this
23 section shall not exceed _____ dollars (~~\$_____~~) *two hundred*
24 *dollars (\$200).*

25 (g) If the installation of a fire sprinkler system is the sole
26 renovation, the fee imposed for a local building inspection shall
27 not exceed _____ dollars (~~\$_____~~) *two hundred dollars (\$200).*

28 (h) Local government units are encouraged to work together to
29 minimize the number of pre and post installation inspections to
30 minimize fees imposed on residential facilities.

31 SEC. 2. No reimbursement is required by this act pursuant to
32 Section 6 of Article XIII B of the California Constitution because
33 the only costs that may be incurred by a local agency or school
34 district will be incurred because this act creates a new crime or
35 infraction, eliminates a crime or infraction, or changes the
36 penalty for a crime or infraction, within the meaning of Section
37 17556 of the Government Code, or changes the definition of a

1 crime within the meaning of Section 6 of Article XIII B of the
2 California Constitution.

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SENATE HUMAN
SERVICES COMMITTEE
Senator S. Joseph Simitian, Chair

BILL NO: SB 516
S
AUTHOR: ORTIZ
B
VERSION: As proposed to be amended
HEARING DATE: April 26, 2005
5
FISCAL: Appropriations
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CONSULTANT:
Hailey

SUBJECT

Residential care facilities for the elderly: fire protection

SUMMARY

Requires residential care facilities for the elderly, licensed for no more than six residents, to have installed and maintained an operable automatic fire sprinkler system approved by the National Fire Protection Association (NFPA) for family dwellings.

ABSTRACT

Existing law:

1. Establishes the licensing of community care facilities, for which the State Department of Social Services (DSS) is responsible.
2. Establishes licenses for various types of facilities, including residential care facilities for the elderly for six or fewer persons.
3. Requires that "whether or not unrelated persons are living together, a residential facility which serves six or

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property."

4. Specifies that "no fire inspection clearance or other permit, license, clearance, or similar authorization shall be denied to a residential facility because of a failure to comply with local ordinances from which such facilities are exempt under Section 1566.3, provided that the applicant otherwise qualifies for such fire clearance, license, permit, or similar authorization."

5. Requires the State Fire Marshal (SFM) to establish separate fire and panic safety standards for specified facilities, and that the SFM is responsible for the promulgation of regulations for the prevention of fire and protection life and property against fire in buildings that house six or fewer person of any age that are placed there by order of a government agency for their protection.

6. Defines, through statute and regulation, "ambulatory" (able to exit without assistance), "non-ambulatory" (needing assistance to exit), and "bed-ridden" (needing assistance to turn in bed) for purposes of licensure and the regulation of health and safety.

7. Requires DSS and SFM, in consultation with the Department of Developmental Services, to promulgate regulations for residential care facilities for the elderly, relating to fire and safety standards for bedridden residents. Requires the regulations to clarify requirements for facilities serving six or fewer persons, at least one of whom is bedridden, and a process for approving alternate means of meeting the standards.

8. Permits bedridden persons to be admitted to and remain in residential facilities that secure and maintain an appropriate fire clearance. Requires a fire clearance to be issued to a facility with a bedridden person if it meets fire safety requirements or has alternative methods of protection that have been approved.

9. Prohibits a local fire official from imposing fire safety requirements stricter than the applicable state ones for facilities serving six or fewer clients.

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10. Specifies that care facilities housing more than six persons have automatic sprinkler systems.

11. States that all building standards adopted or proposed by a state agency shall be submitted for approval to the California Building Standards Commission.

This bill:

1. Mandates that any residential care facility for the elderly newly licensed on or after January 1, 2009, for six

or fewer residents shall have an operating automatic fire sprinkler system equivalent to an NFPA 13D system, for family dwellings.

2. Mandates that any residential care facility for the elderly having a valid license for six or fewer residents as of January 1, 2009, shall have an operating automatic fire sprinkler system equivalent to an NFPA 13D system, for family dwellings, installed and maintained by January 1, 2013.

3. Directs the SFM to adopt regulations by January 1, 2007, to implement this bill, including addressing those fire safety features no longer required of a licensee after a sprinkler system is installed and maintained.

4. Directs public water agencies to continue to treat the facility as a residence entitled to residential water rates and prohibits them, and other local government agencies, from requiring the facility to install a new water meter or new connections to the water system as a consequence of installing a sprinkler system

5. Caps at \$200 the fee for inspections, by the local fire marshal, related to the installation and maintenance of the sprinkler system.

7. Caps at \$200 any separate fee imposed by local building commissions or departments of local government.

8. Directs local government building and fire agencies to coordinate inspections when possible to minimize fees imposed on residential facilities.

FISCAL IMPACT

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According to the Senate Committee on Appropriations, when analyzing a similar bill in 2004, there is a minor absorbable workload to DSS and the SFM to adjust licensing and inspection regulations accordingly.

There is also an unknown "and potentially significant" increase in the cost of care. This bill creates significant unknown costs of at least \$2 per square foot to small facility providers to meet the sprinkler standards in this bill. Many residents of these facilities pay their fees using their Supplemental Security Income/State Supplementary Program (SSI/SSP) grant. Others, who are clients of Regional Centers, may pay their fees through the Department of Developmental Services. Private insurance and personal funds pay the fees for some residents.

BACKGROUND AND DISCUSSION

The author's purpose

In December of 2002, a fire at a residential care facility within the City of Torrance killed three residents who perished trying to evacuate. According to news reports, the three victims were not ambulatory. The facility was not equipped with an automatic fire sprinkler, but it did meet all safety standards required of it.

According to the sponsors, automatic fire sprinklers will suppress fires before they become deadly, and they will slow and lessen the ferocity of fires, giving residents of care facilities time needed to evacuate or be rescued by facility staff or by the responding firefighters.

Facilities covered by the bill

According to DSS, California currently has 5,200 residential care facilities for the elderly with six or fewer beds.

The Health and Safety Code defines residential care facility for the elderly as a housing arrangement chosen voluntarily by persons 60 years of age or over, or their authorized representative, where varying levels and intensities of care and supervision, protective supervision, or personal care are provided, based upon their varying needs, as determined in order to be admitted

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and to remain in the facility. Persons under 60 years of age with compatible needs may be allowed to be admitted or retained in a residential care facility for the elderly as specified.

Uncertain data on fires

The State Fire Marshal receives data from local fire departments and fire districts that choose to report. Of the state's more than 900 departments, fewer than 300 report to the SFM. During the 11 year period from 1992 through 2002, the SFM received reports of 650,000 fires, or which 217 were in residential board and care facilities (0.03 percent). These 217 fires resulted in seven deaths and 20 injuries. (Three of the 20 injuries were to firefighters.) Property loss for these fires was estimated at \$2 million and content loss was an additional \$750,000, according to SFM data.

The SFM cautions on the use of these data in evaluating the need for SB 516 in part because the reporting does not break out statistics on the residential facilities for the elderly that are covered by the bill. Another SFM report for the same 11 years identifies four deaths, rather than seven, in "fires in residential boarding and health care facilities."

The Community Residential Care Association of California believes that the fire in 2002 in the City of Torrance is

the only such deadly fire in more than 10 years in a facility covered by SB 516. By comparison, according to data provided by the California Fire Chiefs Association of California, there are between 60 and 70 deaths in California each year caused by fires in all single family dwellings.

Data on cost

Last year, the California State Pipe Trades Council provided the Legislature with comment on part of the difficulty of estimating the cost of installing an automatic fire system in a single-family home. "The fluctuation in pricing depends on architectural features, pipe routing limitations, city rulings, and other factors above the baseline average. Pricing [often] does not include connection fees from the water departments or the cost of the water meter." Indeed, estimates provided by

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supporters of a somewhat similar bill last year ranged from \$2 per square foot to \$6 per square foot, plus permit and inspection fees.

In an effort both to control costs and to minimize cost fluctuations from region to region, SB 516 does the following:

Directs the use of a lower-cost sprinkler system, approved by the National Fire Protection Association (NFPA) for use in residential dwellings - NFPA 13D. According to the supporters of the bill, this system has sprinklers installed in only those parts of a house where residents live rather than the entire building, including attics, garages, closets, and storage areas.

In addition, the supporters contend that this system is designed to run from normal water pressure, and would not require a new water connection or meter.

Directs local agencies, including water districts, to treat this system as a residential system, rather than a commercial one, to set any fees or rates accordingly, and not to impose the installation of larger connecting pipes or new meters.

Directs local fire agencies and local governments to minimize the number of inspections - and resultant building inspection fees.

Caps the inspection fees at \$200 apiece.

Recent legislation - new regulations now in effect
In 2000, the Legislature passed SB 1896 (Ortiz, Chapter 817), which required the SFM and DSS each to promulgate regulations applicable to all residential facilities licensed by DSS, regulations that would permit residents to remain in home-like settings, and, at a minimum, would guide fire safety in a residence of six or fewer clients, at least one of whom is bedridden. These regulations, promulgated earlier this year, clarify the fire and life safety requirements for a fire clearance for the facility,

and they identify procedures for requesting the approval of alternative means of providing equivalent levels of fire and life safety protection.

Social trends, provider rates, and recruitment of providers

As individuals live longer and as institutional care falls into disfavor both with the law and with social mores, the

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need for community care facilities increases. Autumn Solutions, a San-Diego-based statewide organization that specializes in helping consumers find long term care insurance, reports increasing demand for assistance to stay in one's own home followed by people's desire to find a small-group residence, with a home-like atmosphere. Simultaneously, Autumn Solutions reports, freezes in state reimbursement rates for residential care have made the recruitment of new providers difficult.

Housing law

California law treats a residential care facility of up to six beds as a residential use of property. As such, local governments cannot impose certain zoning ordinances that treat these care facilities differently from residences. Federal and state fair housing law also contributes to the issues raised by this bill: one class of residents - such as elderly persons or persons with disabilities - cannot be treated distinctly by special requirements that apply only to those classes but not to all classes of residents. Such conditions or restrictions may result in the denial of equal housing opportunities.

Arguments in support

Fire departments in support of the bill cite national statistics that point to a 95 percent fire survivability rate in homes equipped with an automatic sprinkler system and smoke detectors. According to the National Fire Protection Association, there is no record of a fire killing more than two people in a completely fire sprinkled building where the system was properly maintained. Virtually all letters of support include this statement: "residential fires account for more than 78 percent of all deaths from fires. The combined protection of smoke detectors, alarm, and fire sprinklers could reduce the fire death rate by nearly 82 percent."

The Ventura Fire Chiefs' Association supports the bill because of its belief that California has not yet developed adequate codes and standards to meet the growing needs of the residential care facilities now being located in single-family dwellings.

The Montecito Fire District points out that having a sprinkler system installed will help residential care

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facilities for the elderly find proper insurance at a lower cost.

Arguments in opposition

Opponents argue that the bill requires significant expenses that providers will not be able to absorb, and these requirements may force some to go out of business. Inadequate housing for elderly persons, many who have disabilities, is already a significant problem that the bill will worsen.

Opponents also argue that providing residential care for the elderly in a facility of six or fewer beds is protected by statute as a residential use of property. Mandating 5,200 residences to have a sprinkler system, while not requiring all residential properties in California to install a sprinkler system, violates federal and state law, including the federal Olmstead decision (persons with disabilities have a right to live in the community) and state case law dismissing ordinances that imposed blanket fire safety standards on only one set of residential facilities. The Community Residential Care Association of California adds its belief that the current building standards in California provide substantial protections for residents.

Protection and Advocacy also voices concerns that, if enacted, SB 516 will open the door to other legislation requiring sprinklers in additional residential facilities, legislation that will result in fewer community housing options for disabled persons now residing in those facilities.

Protection and Advocacy requests an amendment that would provide funds or incentives to encourage rather than require installation of fire safety equipment, including sprinklers.

COMMENTS AND QUESTIONS

_____ What is the extent of the present risk?
The scope of the problem addressed by this bill is unclear to committee staff. Letters of support for the bill acknowledge that there are no accurate data sets for the facilities that this bill covers, and the resulting

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supportive arguments rely on extrapolations and logic: "most deadly fires occur in single-family residences, infants and elderly persons are most at risk in fires, providing increased fire protection to elderly persons in residences is good policy." Is the Torrance fire in 2002 the only such deadly fire in a residential care facility for the elderly - that is, one fatal fire and three deaths in the past 12 to 15 years in more than 5,000 facilities? Should the committee seek better data before imposing a new requirement and expense on these community care facilities?

New regulations released recently

Should new regulations for the implementation of SB 1896 (Ortiz, Chapter 817, Statutes of 2000), be given a chance to work before a new set of fire-safety standards are imposed on residential care facilities for the elderly?

Tax incentives or credits

Of particular concern to the state are those individuals who reside in residential care facilities for the elderly and who are either recipients of SSI/SSP (cash aid payments for aged, blind, and disabled individuals) or clients of the regional centers (persons with specific disabilities). DSS has no precise estimate of the number of residents of these facilities who are on SSI/SSP or who are regional center clients; however, the percentage could be as high as half. The committee may want to recommend to the author that she consider amendments to provide tax benefits to facilities that install fire safety sprinkler systems and that also serve SSI/SSP recipients or are regional center clients.

Additional cost-containment options

Several years ago, the Legislature faced an analogous challenge when safety advocates sponsored legislation to require certain safety devices in swimming pools and spas. Rather than requiring a retrofit of all pools and spas, the Legislature required installation of these safety devices in all new construction and in any renovation costing more than a threshold amount.

The bill could be amended to require a sprinkler system in any new residence constructed for the purpose of a licensed residential care facility for the elderly, and it could be amended to require that any licensed facility obtaining a

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building permit for renovations costing more than a threshold amount would be required to install sprinklers as part of the renovation. Finally, the bill could be amended to allow facilities to cap their costs for sprinkler installation, permits, and inspections at a reasonable amount - either a total amount, such as \$3000; an amount per square foot of residence covered by sprinklers, such as \$2; or, an amount per sprinkler head installed, such as \$200.

POSITIONS

Support: Alameda County Fire Department
 Alzheimer's Association, California Council
 Big Bear City Community Services District
 California Assisted Living Association
 City of Atascadero Fire Department
 City of Benicia Fire Department
 City of Culver City
 City of El Centro Fire Department
 City of El Cerrito Fire Department
 City of El Paso de Robles, Department of
 Emergency Services
 City of Eureka Fire Department
 City of Foster City Fire Department
 City of Grover Beach Fire Department
 City of Hemet Fire Department
 City of Millbrae Fire Department
 City of Mountain View Fire Department
 City of Napa Fire Department
 City of Oxnard
 City of Poway Fire Department
 City of Rancho Cordova
 City of Redding Fire Department
 City of Roseville Fire Department
 City of San Gabriel Fire Department
 City of Santa Fe Springs Fire Department
 City of Stockton Fire Department
 City of Torrance Fire Department
 City of Yuba County Fire Department
 County of Sonoma, Department of Emergency
 Services
 County of Los Angeles
 Dixon Fire Department
 El Dorado Hills Fire Department

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Elk Grove Community Services District
 Galt Fire Protection District
 Long Beach Fire Department
 Marin County Fire Chiefs Association
 Marin County Fire Department
 Milpitas Fire Department
 Montecito Fire District
 National Fire Sprinkler Association, Inc.
 Nevada County Consolidated Fire Department
 North County Fire Department
 Novato Fire Protection District
 Pebble Beach Fire Department
 Rescue Fire Protection District
 Sacramento Metropolitan Fire District
 San Mateo County Fire Prevention Officers
 San Ramon Valley Fire Protection District
 Turlock City Fire Department
 Union City Fire Chiefs Association

Ventura County Fire Chiefs' Association
West Covina Fire Department
Two Families

Oppose: Association of California Care Home Operators
(April 6 version)
Community Residential Care Association of CA
(April 7 version)
Society of California Care Home Operators
(April 6 version)
Protection and Advocacy, Inc. (unless
amended)

-- END --