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To: Mill Valley City Council
From: Dr. Marcelo M. Hirschler (GBH International)
Date: March 2, 2019

**Subject: Miller Avenue Roadway and Parking Configuration from Millwood Street to Willow Street
("Parkway" Room)**

The permanent allowance of parking on the side of Miller Avenue making permanent a width of less than 20 feet on portions of Miller Avenue is not safe and would mean that the city of Mill Valley would have a street layout that is not in compliance with the 2016 California Fire Code or with the 2018 International Fire Code (which is the nationwide model on which the California code is based).

Both of the above-mentioned codes state as follows:

“503.2.1 Dimensions. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096 mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115 mm).”

The Mill Valley City Staff Report dated March 4, 2019 states as follows, thereby acknowledging that the required dimensions of a fire apparatus access road apply.

“Roadway Standards. The City of Mill Valley does not have defined roadway width standards. Section 503 .2.1 of the California Fire Code requires fire apparatus access roads to have a minimum width of 20 feet. A Fire Apparatus Access Road is defined as: *A road that provides fire apparatus access from a fire station to a facility, building or portion thereof This is a general term inclusive of all other terms such as fire lane, public street, private street, parking lot lane and access roadway.*”

The report continues as follows:

“Section 503.2.2 of the California Fire Code authorizes the local fire code official to require or permit modifications to the access width where necessary to meet the public safety objectives of the jurisdiction. The unobstructed portion of the Miller Avenue in the Parkway varies between 18.9 and 20.3 feet, measured from the center median to the edge of the curbside parking aisle.”

The above acknowledges that the width is less than 20 feet on portions of Miller Avenue, as a result of the allowance of parking on a certain stretch of the road. No explanation or justification is given for the implicit claim that allowing a lower width for Miller Avenue is based on improved public safety.

It is notable that the California Fire Code (and the International Fire Code) states as follows:

“503.1 Where required. Fire apparatus access roads shall be provided and maintained in accordance with Sections 503.1.1 through 503.1.3.

503.1.1 Buildings and facilities. Approved fire apparatus access roads shall be provided for every facility, building or portion of a building hereafter constructed or moved into or within the jurisdiction. The fire apparatus access road shall comply with the requirements of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the building as measured by an approved route around the exterior of the building or facility.



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Exceptions:

1. The fire code official is authorized to increase the dimension of 150 feet (45 720 mm) where any of the following conditions occur:

1.1. The building is equipped throughout with an approved automatic sprinkler system installed in accordance with Section 903.3.1.1, 903.3.1.2 or 903.3.1.3.

1.2. Fire apparatus access roads cannot be installed because of location on property, topography, waterways, nonnegotiable grades or other similar conditions, and an approved alternative means of fire protection is provided.

1.3. There are not more than two Group R-3 or Group U occupancies.

2. Where approved by the fire code official, fire apparatus access roads shall be permitted to be exempted or modified for solar photovoltaic power generation facilities.

503.1.2 Additional access. The fire code official is authorized to require more than one fire apparatus access road based on the potential for impairment of a single road by vehicle congestion, condition of terrain, climatic conditions or other factors that could limit access.

503.1.3 High-piled storage. Fire department vehicle access to buildings used for high-piled combustible storage shall comply with the applicable provisions of Chapter 32.”

It is clear that none of the exceptions apply, and that, therefore, Miller Avenue should be a full-width (i.e. 20 feet) fire apparatus access road that is provided for buildings in the area in question.

In view of the fact that Miller Avenue is the primary means of vehicular emergency egress from Mill Valley or ingress into Mill Valley, the existence of a section of that road that is a single lane section is a clear decrease in public safety for the city. It cannot be argued that a single lane road provides the same level of ease of emergency vehicular egress from the city or ingress into the city than would be provided by a dual lane road. The intended permanent allowance of parking along Miller Avenue in the relevant section appears to be the key reason that no dual lane road exists.

I hereby urge the city of Mill Valley to eliminate parking along the relevant stretch of Miller Avenue and reinstate its proper status as a dual lane road to help emergency vehicular exit from the city.

I am a fire safety consultant residing in Greater Mill Valley and have a long background in fire safety and in codes and standards. I attach to this letter a copy of my Curriculum Vitae.

A handwritten signature in black ink that reads "Marcelo M. Hirschler". The signature is written in a cursive, flowing style.

Dr. Marcelo M. Hirschler