

February 15, 2026

Chief Estrada
Commissioner Kraule
Commissioner Zambetti
Commissioner Kao

Re: SCCFD Plan Review No. 260099

Dear Chief Estrada, Commissioner Kraule, Commissioner Zambetti, Commissioner Kao:

Residents whose homes rely on Three Oaks Way as their defined fire apparatus access road have received the referenced Plan Review dated January 13, 2026, concerning the proposed project at 19761 Three Oaks Way. We appreciate your continued commitment to public safety and diligent enforcement of the Fire Code. We respectfully request confirmation that all applicable Fire Code provisions will be fully satisfied before any approvals or permits are issued for this project.

As you know, we have previously met with you, members of your staff, the Saratoga Fire Commission, and City of Saratoga officials regarding this development. During those discussions, we were encouraged by shared affirmation that compliance with the Fire Code is mandatory and by your written confirmation that “a permit presuming to give authority to violate or cancel the provisions of the fire code or other such laws or regulations shall not be valid.”

The Fire Code establishes objective, measurable requirements that were in effect when this project application was submitted. The most recent Inconsistency Letter reinforces that these standards govern the review. However, several critical requirements remain not yet satisfied and others have been omitted.

Outstanding Compliance Issue Examples

1. Single Access Road Dependency

SCCFD has identified Three Oaks Way as the fire apparatus access road providing ingress and egress for existing homes on Three Oaks Way and three connected roadways that are entirely dependent upon it. These roadways currently serve 30 dwelling units, none of which have alternative access (see Attachment A).

2. Maximum Dwelling Units Served by Single Access Road

SCCFD Specification No. A-1, Fire Department Apparatus Access, Section IV-C-1 states:

“Developments of one or two-family dwellings where the number of dwelling units exceeds 30 shall be provided with two separate and approved fire apparatus access roads...”

Because the existing system already serves 30 units, any additional dwellings would trigger the requirement for secondary access.

3. Secondary Access Road Separation Requirement

Section V.A requires that where two access roads are required, they must be separated by at least one-half of the maximum overall diagonal dimension of the area served, measured centerline to centerline.

4. Prior Permitting Reached The Current Code Limitation

Previous approvals for the nine-acre Three Oaks Court development were limited to seven new dwellings rather than nine otherwise allowed by zoning, bringing the total to the 30-unit threshold allowed for a single access road.

5. Access Road Compliance Not Yet Demonstrated

SCCFD's Plan Review indicates that compliance with required roadway standards has not yet been demonstrated, stating:

“Revise plans to show the width, slope, and radii of turns of the access road (Three Oaks Way). [CFC Sections 106.2.1, 503.2.1, 503.2.2, 503.2.3, & 503.2.4].”

Attachment C shows how the non-compliant Three Oaks Way is blocked when a large vehicle passes through.

6. Additional Proposed Violations of The Fire Code

Six proposed buildings exceed 30 feet in height, which triggers aerial apparatus access road requirements that are not addressed in the review comments, including:

- Minimum unobstructed width of 26 feet
- Required proximity of 15–30 feet from at least one entire side of the building
- Absence of overhead obstructions

7. CCF 104 General Authority and Responsibilities (A) 104.1 General

Official's “interpretations shall be in compliance... with the intent and purpose of this Code”

Given the clear life-safety implications for existing residents and the objective standards established in the Fire Code, we respectfully request written confirmation that no approvals or permits will be issued unless and until all applicable Fire Code requirements are demonstrably satisfied. Attachment B is a partial list of Fire Code sections relevant to this correspondence. Other Code sections also apply.

If the Department determines that any cited provisions do not apply, we respectfully request written identification of the specific code authority supporting that determination, so the administrative record accurately reflects the basis for such decision.

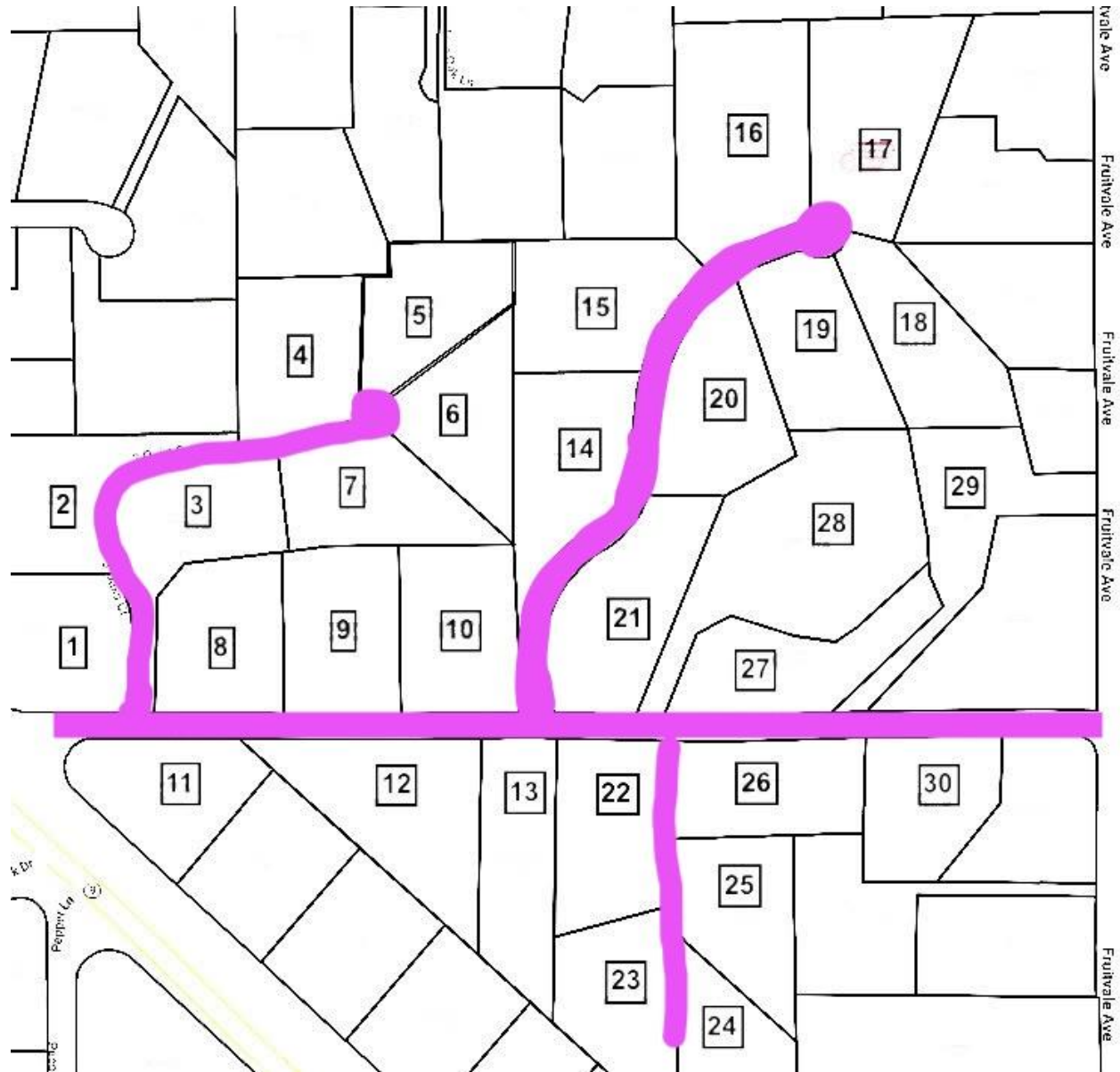
Because this issue directly affects emergency access and resident safety, we respectfully request a meeting with you to discuss further and your written response.

Respectfully,

Bill Boller
Sandeep Jain

Cc: Trina Whitley

Attachment A: 30 Dwellings Requiring Three Oaks Way Fire Access Road



Attachment B — Authorities & Code Sections Cited in Letter (URLs + Issue Crosswalk)

Project: 19761 Three Oaks Way, Saratoga, CA 95070

Accessed: February 14, 2026 (retain PDFs + printouts for the administrative record)

A.1 Santa Clara County Fire Department Standards (controlling local standard referenced in letter)

SCCFD Standard Details & Specifications (SD&S) — Spec No. A-1, “Fire Department Apparatus Access,” Rev. 05/12/2021 (PDF) ([Santa Clara County Fire Department](#))

- Official PDF URL (primary): ([Santa Clara County Fire Department](#))
- SCCFD Standards landing page (secondary): ([Santa Clara County Fire Department](#))

A-1 sections relied upon in the letter (with issue crosswalk):

- A-1 § IV.C.1 (“One Access Road” / >30 dwelling units ⇒ two access roads; exception framework) → Letter Issue #2 ([Santa Clara County Fire Department](#))
 - A-1 § V.A (Required separation between two access roads: ½ maximum diagonal, centerline-to-centerline) → Letter Issue #3 ([Santa Clara County Fire Department](#))
 - A-1 § VI (Aerial Fire Apparatus Access Roads; >30 ft trigger; 26-ft unobstructed lane near building; proximity/orientation; overhead conflicts) → Letter Issue #6 ([Santa Clara County Fire Department](#))
 - A-1 Definitions (including “Roadway” / “Driveway” classifications) → Letter Issue #1 (served-by / access-road characterization) ([Santa Clara County Fire Department](#))
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A.2 California Fire Code (CFC) (controlling state code cited by SCCFD plan check)

California Fire Code (Title 24, Part 9) — official state publication context ([Department of General Services](#))

- CA Building Standards Commission codes page: ([Department of General Services](#))
- ICC “2022 California Fire Code (CAFC 2022)” portal (public landing): ([ICC Digital Codes](#))
- CAFC 2022 Chapter 5 “Fire Service Features” portal (where §503 lives): ([ICC Digital Codes](#))
- Example municipal adoption statement confirming “CFC 2022 Edition, Title 24, Part 9” framing (reference): ([American Legal Publishing](#))

CFC sections explicitly cited in SCCFD plan-check comment quoted in the letter (issue crosswalk):

- CFC §106.2.1 — Construction documents / required information → Letter Issue #5 ([Department of General Services](#))
- CFC §503.2.1 — Dimensions (unobstructed width / vertical clearance; as required by Fire Code Official) → Letter Issue #5 ([ICC Digital Codes](#))
- CFC §503.2.2 — Authority (Fire Code Official sets/access specs) → Letter Issue #5 ([ICC Digital Codes](#))
- CFC §503.2.3 — Surface / imposed loads (apparatus load capability; bridges/elevated surfaces) → Letter Issue #5 ([ICC Digital Codes](#))
- CFC §503.2.4 — Turning radius → Letter Issue #5 ([ICC Digital Codes](#))

Publicly readable “reference text” mirrors (non-controlling convenience copies):

(Use these only to let a reader see typical section wording without an ICC subscription; the controlling text remains the locally adopted CFC + SCCFD standards.)

- Example mirror of §503.2.1 (Dimensions): ([American Legal Publishing](#))
- Example mirror of §503.2.3 (Surface / imposed loads): ([American Legal Publishing](#))
- Example mirror of §503.2.4 (Turning radius): ([American Legal Publishing](#))

Attachment C: Example of space restrictions and road grade slope on Three Oaks Way. A picture of a cement truck (roughly size of a fire truck) blocking through traffic on Three Oaks Way

