



## Special Events Bullet Points

State Fire Marshal: Special Event Permit Proposed Changes

Below you will find bullet points addressing the State Fire Marshal’s proposed changes to Special Event Permits. You can use these as talking points, and to assist you as you create your response letter.

- **“Special Events” definition should not apply to fairgrounds.**
  - Our facilities are purpose built to safely hold large numbers of people.
  - Existing Government Code establishes that what fairgrounds “do” is largely not special as it is the reason for our existence.
- **Proposed requirements for event staffing Deputy Fire Marshals is excessive and could potentially close many fairgrounds.**
  - An 8 hour party with 500 people would require \$3,840 in fees paid to the Fire Marshal
  - A 14 hour Fair Day with 7500-15000 people would cost \$20,160 in fees paid to the Fire Marshal.

**Table 1. Minimum Staffing of Special Events**

| Minimum Staff Levels  |           |           |             |                 |
|---|-----------|-----------|-------------|-----------------|
| Event Size (Number of Attendees)  | 1-1000    | 1000-7500 | 7500-15,000 | 15,00 and above |
| Number of Deputies  | 2 a,b,c,d | 4 a,b,c,d | 6 a,b,c,d   | TBD a,b,c,d     |
| Special Factors   |           |           |             |                 |
| a. 2 Deputies per stage.<br>b. 1 Deputy per special effect display<br>c. Staffing levels are subject to change after safety analysis by the Department<br>d. Emergency Medical Services staffing may be required after safety analysis by the Department. |           |           |             |                 |

- Renters and promoters will look for other venues in order to save money on fees and in order to not have to follow the ever-growing number of regulations from the OSFM.
- **Initial Statement of Reasons (ISOR) Economic Impact**
  - Will not have an impact on Creation or Elimination of Jobs within the State of California
    - FALSE
  - Will not have an impact on Creation of New or Elimination of Existing Businesses within the State of California
    - FALSE – Many small businesses rely on fair, festivals and events on fairgrounds
  - Will not have an impact on Expansion of Business Currently Doing Business within the State of California.
    - FALSE – Statement says that it “will not limit or discourage the expansion of existing businesses”
- **Fairs have a track record of safety.**
  - We hold safe events in our communities with security, local law enforcement or other first responders providing onsite crowd management.
  - We carry our own insurance and have insurance agents and F&E to review contract language and liability coverage.
- **No Events = Closure**
  - Closure means loss of emergency services support!
  - Without interim events most fairs cannot justify staff levels
  - Without interim events most fairs cannot keep the lights on!
- **Other Fire Marshal Intrusions into our operations**
  - In recent years (or in some cases months) the OSFM has begun heavy handed enforcement on many fairgrounds.
  - Services provided by individual Fire Marshals are inconsistent between events and especially between individual Fire Marshals.
  - OSFM has not consulted with Fairs on how any of their regulations or enforcement tactics will affect the fairs.