

SAN BERNARDINO COUNTY FIRE PROTECTION DISTRICT'S RESPONSE TO THE 2025 SAN BERNARDINO COUNTY GRAND JURY FINAL REPORT

(Verbatim Grand Jury Findings and Recommendations are in italics)

FINDING F-1

The SBCFPD's maintenance personnel must go back and forth between the two maintenance yards and department's parts warehouse, which is in a third location. This causes delays in the repair of out-of-service fire apparatuses.

The San Bernardino County Fire Protection District (SBCFPD) partially disagrees with this finding. SBCFPD's Vehicle Services Section (Vehicle Services) currently has two locations – one at 210 South Lena Road in San Bernardino and the second two miles away at 120 South D Street. The parts warehouse/storeroom is at the Lena Road location. Vehicle Services also has three parts specialists and one parts chaser. The parts chaser is located at Lena Road. The parts chaser delivers parts between the two locations when the required parts are not already in stock at the work location. When the parts chaser is not available, one of the parts specialists delivers parts. A third parts specialist was added to Vehicle Services last year, assigned to the D Street location, since then maintenance personnel are rarely required to travel between the two maintenance facilities.

RECOMMENDATION R-1

That the SBCFPD consolidates these three locations.

SBCFPD has been taking action to effectively implement this recommendation. In addition to staffing improvements, SBCFPD is actively working to acquire land for the relocation and consolidation of Vehicle Services to further improve efficiency and ultimately reduce out-of-service time for fire apparatus.

FINDING F-2

SBCFPD has introduced drones and robotics into its firefighting arsenal but has insufficient resources and qualified personnel to take advantage of this new technology. As a result, the district cannot fully implement its Drone First Response program.

SBCFPD agrees with this finding. SBCFPD's drone program, while technologically advanced, has not completed its full program roll-out. The program is designed to be implemented in phases that are restricted by FAA rules and regulations, pending grants and the availability of other SBCFPD revenues.

In 2025 (Phase 1), SBCFPD initiated a "robotic section" designed to complete several program charters including SASA (Sustained Aerial Situational Awareness), EASA (Early Aerial Situational Awareness), and a "robotics unit" (a firefighter/certified drone pilot staffed vehicle with aerial, ground, and robotics drones).

In 2026 (Phase 2), SBCFPD will expand its certified operators with several “certifying classes,” with classes identified and funds being allocated to travel and attend these classes. In addition, SBCFPD intends to create new civilian robotic operator positions and is working with San Bernardino County Human Resources on this new classification. This classification, when created, will allow SBCFPD to hire certified civilian operators to augment its drone and robotic operations. SBCFPD intends to fund three of these positions in the Fiscal Year 2026-27 budget.

RECOMMENDATION R-2

That the SBC Board of Supervisors provide funding for resources and personnel so that the SBCFPD can fully implement their DFR program.

This recommendation is being implemented. The Board of Supervisors, acting as the governing Board of SBCFPD, works closely with SBCFPD to prioritize and meet SBCFPD’s needs.

FINDING F-3

SBCFPD trains new recruits through its fire academy to meet the qualifications necessary for firefighting certification. The district, though, does not provide competitive incentives to retain many of these recruits. As a result, after completing their academy training, many recruits leave SBCFPD to seek employment with other fire agencies, leaving the district with insufficient certified firefighters.

SBCFPD disagrees with this finding. Through collective bargaining with the International Association of Firefighters (IAFF) Local 935, SBCFPD increased wages, incentive pay and other benefits for its firefighters in 2025. The agreement included approximately \$4 million to establish a Healthcare Trust for the group, four- 3% across-the-board wage increases effective January 10, 2026, January 9, 2027, January 8, 2028, and January 6, 2029, a 4% equity (increase) for all salary ranges, roll-in stipend for Emergency Medical Technician (EMT) and Paramedic certifications to base salary, increased Company Officer certification from \$150 per month to \$210 per month, roll-in stipend for Company Officer Certification, added a new 2.5% top step for Engineers and Captains, established Truck Operations Specialty Pay, increased the Medical Premium Subsidy for all coverage levels, increased Bilingual Pay for eligible employees to \$50 per pay period, and increased Long Term Disability by \$5 per month.

Although some new recruits chose to leave SBCFPD for other employment, the specific number was only 33 of 266 (15%) new employees left for other employment. This trend has continued to improve over the last three years.

Additionally, SBCFPD’s vacancy rate continues to decrease. In February of 2021, there were 86 vacancies out of 583 (15%) certified firefighter positions. As of January 2026, there are only 31 vacancies out of 613 (5%). As a result, the vacancy rate improved from 15% to 5%.

RECOMMENDATION R-3

That SBCFPD increase the incentives to retain firefighters.

This recommendation has been implemented as outlined in the response to Finding F-3.

FINDING F-4

OSHA requires compliance with its "2-in/2-out" rule of four firefighters for each deployed fire engine, but SBCFPD does not comply, instead deploying only three per engine. As a result, this lack of a fourth (and required) firefighter creates delay when that fourth is needed and reduces the district's capacity to fight fires and rescue victims.

SBCFPD disagrees with this finding. OSHA 29 CFR 1910.134(g)(4), California Code of Regulations 8 CCR § 5144(g)(4), and NFPA 1500 establish the 2-in/2-out rule as a tactical deployment standard, not a minimum staffing requirement per apparatus. The regulation requires:

- A minimum of two firefighters working as a team inside an IDLH atmosphere
- A minimum of two firefighters remaining outside for accountability and emergency rescue

These four firefighters must be **on scene** before interior operations commence. They are not required to arrive on a single apparatus.

SBCFPD has developed Operations Directive 3011, "Firefighter Safety and Accountability in Hazardous Environments," which comprehensively outlines procedures for firefighters operating in Immediately Dangerous to Life or Health (IDLH) environments. This directive ensures full compliance with federal and state occupational safety regulations. Operations Directive 3011 provides clear guidance that first-arriving apparatus with fewer than four personnel must remain outside the structure fire and conduct critical exterior operations until additional resources arrive on scene. Once the 2-in/2-out requirement has been established (minimum four firefighters on scene), the on-scene officer establishes their tactical mode, such as "Attack Mode," and interior operations may commence.

Exterior operations conducted while awaiting additional resources include:

- 360-degree situational survey
- Structure "softening" (forcing entry points, removing security bars)
- Utility control and isolation
- Ladder placement for secondary egress
- Hose line deployment
- Exterior fire attack to reduce fire load

REGULATORY EXCEPTIONS TO 2-IN/2-OUT REQUIREMENT

OSHA and Cal-OSHA regulations recognize specific circumstances where the 2-in/2-out rule does not apply or may be temporarily suspended. These exceptions are clearly defined in 29 CFR 1910.134(g)(Note 2), 8 CCR § 5144(g)(Note 2), and NFPA 1500 Sections 8.5.17 and 8.5.17.1:

1. Incipient Stage Fires

OSHA defines an incipient stage fire as one "which is in the initial or beginning stage and which can be controlled or extinguished by portable fire extinguishers, Class II standpipe, or small hose systems without the need for protective clothing or breathing apparatus." Firefighters may attack incipient stage fires without establishing 2-in/2-out, as these do not constitute IDLH environments. Once a fire progresses beyond the incipient stage, it is considered IDLH and the 2-in/2-out rule applies.

2. Imminent Life-Threatening Rescue Situations

The only exception to the 2-in/2-out rule for structural fires beyond the incipient stage occurs when:

- There is an imminent life-threatening situation where immediate action could prevent the loss of life or serious injury
- Immediate rescue action is necessary, and delay would likely result in death or serious harm
- The situation presents a clear opportunity to save a known victim

This exception is narrowly construed. SBCFPD Operations Directive 3011 Section VI.A.4 explicitly states: "No exception shall be permitted when there is no possibility to save lives."

3. Documentation Requirements for Exception Use

When personnel enter a hazard area for a known rescue prior to four members being on scene, SBCFPD requires:

- Immediate notification to the Incident Commander or Communications Center of the impending entry (OD 3011, Section VI.A.6)
- Comprehensive incident documentation including the situation and conditions that led to deviation from 2-in/2-out (OD 3011, Section VI.A.7)
- Investigation by the Incident Battalion Chief or Duty Battalion Chief (OD 3011, Section VI.A.8)
- Written report to the Department Safety Officer and Fire Chief as required by NFPA 1500 Section 8.5.17.2

4. Non-IDLH Operations

The 2-in/2-out rule applies specifically to IDLH environments. Firefighters may operate without establishing 2-in/2-out for non-IDLH operations, including:

- Exterior fire attack operations
- Wildland firefighting operations in open terrain

- Vehicle fires with adequate ventilation
- Medical emergency responses
- Hazardous materials operations in non-IDLH atmospheres with appropriate PPE
- Technical rescue operations outside IDLH environments

SBCFPD personnel are trained to assess whether an environment constitutes IDLH conditions and to apply the appropriate safety protocols based on that assessment.

STRATEGIC STAFFING IMPROVEMENTS

Over the past several years, SBCFPD has made significant investments to increase apparatus staffing from three-person (3-0) to four-person (4-0) configurations. While much of our apparatus currently operate with 3-0 staffing, we have systematically increased 4-0 staffing across SBCFPD.

Most recently, the SBCFPD was awarded a SAFER (Staffing for Adequate Fire and Emergency Response) grant for 21 firefighters. The deployment of these positions has been strategically planned across the fire district to increase 3-0 staffing to 4-0 staffing at key locations. This enhancement allows SBCFPD to minimize the time required to transition from exterior defensive operations to offensive/attack mode upon arrival at emergency incidents.

SBCFPD will continue to seek opportunities to enhance staffing levels to improve on-scene operational capabilities and reduce transition time to offensive mode operations.

OPERATIONAL REALITY

Any perceived "delay" in transitioning to interior operations is not the result of non-compliance but rather represents required compliance with federal and state occupational safety regulations. This operational model:

- Protects firefighters' safety by ensuring adequate personnel are on scene before entering IDLH environments
- Is consistent with fire service best practices nationwide
- Is utilized by the vast majority of fire departments in California and across the United States
- Allows critical life-safety and fire control operations to begin immediately through exterior tactics

Research, including studies by the National Institute of Standards and Technology (NIST), demonstrates that four-person engine companies are more effective and safer. However, the legal requirement (2-in/2-out tactical deployment) differs from the operational ideal (4-0 apparatus staffing). SBCFPD acknowledges this distinction and continues working toward optimal staffing levels while maintaining strict regulatory compliance.

RECOMMENDATION R-4

That the SBC Board of Supervisors increase the number of firefighters per engine available to SBCFPD.

This recommendation is being implemented as appropriate as outlined in the response to Finding F-4. SBCFPD operates in full compliance with OSHA, Cal-OSHA, and NFPA regulations governing firefighter safety in IDLH environments. Operations Directive 3011 establishes clear, enforceable procedures that meet or exceed all regulatory requirements. SBCFPD's ongoing efforts to increase apparatus staffing through the SAFER grant and other initiatives demonstrate our commitment to enhancing operational effectiveness and firefighter safety.

SBCFPD personnel are thoroughly trained on both the requirements and the narrowly defined exceptions to the 2-in/2-out rule, ensuring that operational decisions prioritize firefighter safety while maintaining our ability to respond effectively to life-threatening emergencies.

FINDING F-5

There is no official routine documentation provided by independent water districts to SBCFPD about the readiness of public water hydrants to deliver sufficient water to combat fires. As a result, SBCFPD is unaware of the readiness status of these hydrants and is unsure of the district's capacity to hook up and extinguish the fires.

SBCFPD partially agrees with this finding. There is currently no uniform, routine documentation provided by independent water districts to SBCFPD regarding the operational readiness of public fire hydrants or the ability to deliver sufficient water for fire suppression purposes. As a result, SBCFPD's awareness of hydrant operational status and available water supply varies by jurisdiction and is dependent on individual coordination efforts.

RECOMMENDATION R-5

That the SBC Board of Supervisors provide any current agreements with SBCFPD and create a procedure to obtain regular reports from all SBC water districts providing SBCFPD with reports indicating compliance with all guidelines and standards.

This recommendation will be implemented. SBCFPD will compile and provide any current agreements that relate to coordination, service delivery, or compliance responsibilities involving water districts, as SBCFPD has been working with more than 80 independent water districts throughout San Bernardino County to develop a comprehensive inventory of water supply systems and available fire flow rates for each community served. This ongoing effort is intended to improve situational awareness, planning, and coordination related to fire protection and emergency response capabilities across diverse service areas.

Additionally, the Chief Executive Officer, in coordination with County Counsel, SBCFPD, and the appropriate County departments, will evaluate the feasibility of establishing a standardized procedure for obtaining periodic compliance reports from water districts that interface with SBCFPD. This evaluation will consider existing statutory authority, governance structures of independent water districts, administrative impacts, and alignment with applicable state and local regulations. The goal is to ensure SBCFPD receives timely and accurate information necessary to confirm compliance with applicable fire protection guidelines and standards while respecting the legal and operational frameworks under which water districts operate. SBCFPD staff will return to the Board with findings and recommendations, including potential reporting mechanisms, frequency, and scope for further consideration.