

# URBAN-WILDLAND INTERFACE CODE

## 2001 PUBLIC COMMENTS

### A-I-C - 01 - 1 2- C.F.C. U.W.I.C.

#### Proposed Change as Submitted:

**Proponent:** Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee

#### Delete text as follows:

#### APPENDIX I-C FIRE HAZARD SEVERITY FORM

##### A. Subdivision Design

##### 5. Average Lot Size

10 acres or larger \_\_\_\_\_ 1\_\_  
Larger than 1 acre, but less than 10 acres \_\_\_\_\_ 3\_\_  
1 acre or less \_\_\_\_\_ 5\_\_

#### Renumber remaining text.

**Proponent's Reason:** The subdivision Design section of form accounts for over 30% of the total (worst case) points that that can be assessed. This is too much when considering that roofing material accounts for 9% of the assessment and defensible space accounts for less than 5%. A structure with great access and water, located on a slope of 19%, constructed with noncombustible siding and serviced by underground utilities, but with a non-rated roof, and no defensible space in heavy fuels, would not even classify as a moderate hazard under the rating system. This change will lessen the weighing of this section. Smaller lot sizes may actually assist in structure protection, because an engine company can be positioned to protect multiple properties, whereas, a single engine company would be required for each structure located on 10 acre lots. Larger lots also imply greater fuel loadings between structures and property lines and longer driveways that will further slow suppression forces.

**Committee Action:** **Disapproved**

**Committee Reason:** The proposal provides no technical justification for changes.

**Assembly Action:** **No Motion**

#### Individual Consideration Agenda:

**This item is on the agenda for individual**

**consideration because a public comment was submitted.**

#### Public Comment

**Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee, requests Approval as Submitted.**

**Committer's Reason:** We do not agree with the recommendation of the UWIC Code Development Committee on Item 12. Therefore, we hereby challenge Urban-Wildland Interface Code Item 12 (Appendix I-C, Fire Hazard Severity Form) and request that this item be Approved as Submitted.

At the Portland hearings, the committee was reluctant to consider the submittals to this appendix without knowing the overall impact. As such the four submittals have been combined into one and summarized below.

Looking at the worst case scenario for each category, the Subdivision Design section of the form accounts for over 30% of the total (worst case) points that can be assessed. This is too much when considering that roofing material accounts for 12% of the assessment and defensible space accounts for less than 9%. A structure with a non-rated roof, no defensible space, located in heavy fuels and minimal points in all other categories, would not even classify as a moderate hazard under the rating system. These changes better reflect the importance of roof covering and defensible space.

#### Fire Hazard Severity Form Category Weightings

Category	Current	Proposed
Subdivision design	30%	18%
Vegetation	17%	28%
Topography	12%	10%
Roofing material	12%	19%
Fire protection	12%	10%
Existing building construction materials	12%	10%
Utilities	6%	5%

The lot size category was deleted because smaller lot sizes may actually assist in structure protection. With smaller lot sizes, an engine company can be positioned to protect multiple properties, whereas, a single engine company would be required for each structure located on 10 acre lots. Larger lots also imply greater fuel loadings between structures and property lines and longer driveways that will further slow suppression forces.

Research is lacking as to the causes of structural loss during wildfire. Experience indicates that fuel clearance and roof construction are the two most important factors in preventing structural loss in wildfires. These changes better reflect the importance of these factors.

# A-I-C - 01 - 13- C.F.C. U.W.I.C.

## Proposed Change as Submitted:

**Proponent:** Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee

**Revise text as follows:**

### APPENDIX I-C FIRE HAZARD SEVERITY FORM

#### A. Subdivision Design

6. Street Signs  
Present 1\_\_  
Not present 53\_\_

**Proponent's Reason:** The Subdivision Design section of the form accounts for over 30% of the total (worst case) points that can be assessed. This is too much when considering that roofing material accounts for 9% of the assessment and defensible space accounts for less than 5%. A structure with great access, street signs and water, located on a slope of 19%, constructed with noncombustible siding and serviced by underground utilities, but with a non-rated roof, and no defensible space in heavy fuels, would not even classify as a moderate hazard under the rating system. This change will lessen the weighting of this section.

Street signs are important but not as important as defensible space. The assessment, as currently written, for not having either one is the same; five points.

**Committee Action:** Disapproved

**Committee Reason:** The proposal provides no technical justification for changes.

**Assembly Action:** No Motion

## Individual Consideration Agenda:

**This item is on the agenda for individual consideration because a public comment was submitted.**

### Public Comment

**Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee, requests Approval as Submitted.**

**Commenter's Reason:** We do not agree with the recommendation of the UWIC Code Development Committee on Item 13. Therefore, we hereby challenge Urban-Wildland Interface Code Item 13 (Appendix I-

C, Fire Hazard Severity Form) and request that this item be Approved as Submitted.

At the Portland hearings, the committee was reluctant to consider the submittals to this appendix without knowing the overall impact. As such the four submittals have been combined into one and summarized below.

Looking at the worst case scenario for each category, the Subdivision Design section of the form accounts for over 30% of the total (worst case) points that can be assessed. This is too much when considering that roofing material accounts for 12% of the assessment and defensible space accounts for less than 9%. A structure with a non-rated roof, no defensible space, located in heavy fuels and minimal points in all other categories, would not even classify as a moderate hazard under the rating system. These changes better reflect the importance of roof covering and defensible space.

#### Fire Hazard Severity Form Category Weightings

Category	Current	Proposed
Subdivision design	30%	18%
Vegetation	17%	28%
Topography	12%	10%
Roofing material	12%	19%
Fire protection	12%	10%
Existing building construction materials	12%	10%
Utilities	6%	5%

The lot size category was deleted because smaller lot sizes may actually assist in structure protection. With smaller lot sizes, an engine company can be positioned to protect multiple properties, whereas, a single engine company would be required for each structure located on 10 acre lots. Larger lots also imply greater fuel loadings between structures and property lines and longer driveways that will further slow suppression forces.

Research is lacking as to the causes of structural loss during wildfire. Experience indicates that fuel clearance and roof construction are the two most important factors in preventing structural loss in wildfires. These changes better reflect the importance of these factors

# A-I-C - 01 - 14 - C.F.C. U.W.I.C.

## Proposed Change as Submitted:

**Proponent:** Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee

### Revise text as follows:

#### APPENDIX I-C FIRE HAZARD SEVERITY FORM

#### B. Vegetation (UWIC Definitions)

2. Defensible Space	
70% or more of site	1 <u>    </u>
30% or more, but less than 70% of site	3 <u>10</u>
Less than 30% of site	5 <u>20</u>

**Proponent's Reason:** The Defensible Space section accounts for less than 5% of the total (worst case) points that can be assessed. A structure with great access, street signs and water, located on a slope of 19%, constructed with noncombustible siding and serviced by underground utilities, but with a non-rated roof, and no defensible space in heavy fuels, would not even classify as a moderate hazard under the current rating system. This change emphasizes the importance of defensible space clearance.

**Committee Action:** **Disapproved**

**Committee Reason:** The proposal provides no technical justification for changes.

**Assembly Action:** **No Motion**

### Individual Consideration Agenda:

**This item is on the agenda for individual consideration because a public comment was submitted.**

#### Public Comment

**Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee, requests Approval as Submitted.**

**Commenter's Reason:** We do not agree with the recommendation of the UWIC Code Development Committee on Item 14. Therefore, we hereby challenge Urban-Wildland Interface Code Item 14 (Appendix I-C, Fire Hazard Severity Form) and request that this item be Approved as Submitted.

At the Portland hearings, the committee was reluctant to consider the submittals to this appendix without knowing the overall impact. As

such the four submittals have been combined into one and summarized below.

Looking at the worst case scenario for each category, the Subdivision Design section of the form accounts for over 30% of the total (worst case) points that can be assessed. This is too much when considering that roofing material accounts for 12% of the assessment and defensible space accounts for less than 9%. A structure with a non-rated roof, no defensible space, located in heavy fuels and minimal points in all other categories, would not even classify as a moderate hazard under the rating system. These changes better reflect the importance of roof covering and defensible space.

#### Fire Hazard Severity Form Category Weightings

<u>Category</u>	<u>Current</u>	<u>Proposed</u>
Subdivision design	30%	18%
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The lot size category was deleted because smaller lot sizes may actually assist in structure protection. With smaller lot sizes, an engine company can be positioned to protect multiple properties, whereas, a single engine company would be required for each structure located on 10 acre lots. Larger lots also imply greater fuel loadings between structures and property lines and longer driveways that will further slow suppression forces.

Research is lacking as to the causes of structural loss during wildfire. Experience indicates that fuel clearance and roof construction are the two most important factors in preventing structural loss in wildfires. These changes better reflect the importance of these factors

# A-I-C - 01 - 15 - C.F.C. U.W.I.C.

## Propose Change as Submitted:

**Proponent:** Don Oaks, Santa Barbara County Fire Department; representing California Fire Chiefs Association, Fire Prevention Officers Section, Urban-Wildland Interface Committee

**Revise text as follows:**

### APPENDIX I-C FIRE HAZARD SEVERITY FORM

#### D. Roofing Material

Class A Fire Rated	1	___
Class B Fire Rated	35	___
Class C Fire Rated	510	___
Non-rated	4020	___

**Proponent's Reason:** The Roofing Material section accounts for less than 9% of the total (worst case) points that can be assessed. A structure with great access, street signs and water, located on a slope of 19%, constructed with noncombustible siding and serviced by underground utilities, but with non-rated roof, and no defensible space in heavy fuels, would not even classify as a moderate hazard under the current rating system. This change emphasizes the importance of rated roof material.

**Committee Action:** **Disapproved**

**Committee Reason:** The proposal provides no technical justification for changes.

**Assembly Action:** **No Motion**

## Individual Consideration Agenda:

**This item is on the agenda for individual consideration because a public comment was submitted.**

### Public Comment

**Commenter's Reason:** We do not agree with the recommendation of the UWIC Code Development Committee on Item 15. Therefore, we hereby challenge Urban-Wildland Interface Code Item 15 (Appendix I-C, Fire Hazard Severity Form) and request that this item be Approved as Submitted.

At the Portland hearings, the committee was reluctant to consider the submittals to this appendix without knowing the overall impact. As such the four submittals have been combined into one and summarized below.

Looking at the worst case scenario for each category, the Subdivision Design section of the form accounts for over 30% of the total (worst case) points that can be assessed. This is too much when considering that roofing material accounts for 12% of the

assessment and defensible space accounts for less than 9%. A structure with a non-rated roof, no defensible space, located in heavy fuels and minimal points in all other categories, would not even classify as a moderate hazard under the rating system. These changes better reflect the importance of roof covering and defensible space.

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Research is lacking as to the causes of structural loss during wildfire. Experience indicates that fuel clearance and roof construction are the two most important factors in preventing structural loss in wildfires. These changes better reflect the importance of these factors