



## Recommended Edits to Draft Local Hazard Mitigation Plan

- **15.1.2 Local Conditions Related to Wildfire**

~~Strike Peat fires represent a special hazard in that, once ignited, they are extremely difficult to extinguish. In some instances, islands have been flooded to extinguish peat fires. Any area lying landward of the mean high water line may be peaty because of the marshy origin of the soil. As this does not apply to Oakland.~~

- **15.1.3 Wildland-Urban Interface and Structure Fires**

~~Second paragraph: replace WUI fires are increasing as more vacation homes are built and improved transportation systems allow more people to live outside city centers. The longer response times for these out-of-the-way locations gives the fire more time to burn out of control, making these fires difficult to fight. with:~~

*The Oakland hills with its high rate of development has a long history of WUI fires, the most destructive on which was the 1991 Tunnel Fire. Most firefighters are trained to fight either*

*wildfires or structure fires. As a result of the 1991 Tunnel Fire, Oakland Fire Fighters are trained to fight both wildfires and structure fires. When a WUI fire breaks out, the threat of extreme property and casualty losses often forces firefighters to focus their efforts on protecting homes and structures, sometimes at the expense of protecting wildland resources or working to slow the fire itself. When the fire is moving too rapidly to protect structures, firefighters have to abandon structures and focus on saving lives by evacuating residents.*

### **Paragraph 3**

*Under low wind conditions, structure fires are not typically considered an emergency, except when the fire can spread to adjoining structures. Older structures are often more vulnerable to fire (both where the structure fire starts first and where it is a secondary hazard event tied to a wildfire), because the older structures do not conform to modern building and fire codes and do not contain fire detection devices. These structures are also prone to faulty electrical, heating, and other utility systems because of their age and lack of proper maintenance. Many of these older structures were constructed close together, enabling fire to spread rapidly from one to another. These existing vulnerabilities can facilitate the spread of a wildfire to structures, or vice versa, as the structures are already more likely to catch fire.*

*Add information on what percent of Oakland WUI housing is pre-1991 when older fire codes were in effect and density conditions (for example, houses in North Oakland and*



*Montclair are typically on lots of xxx (or x feet apart, whereas those in the East Oakland hills are constructed on larger lot sizes (on average ). This provides a more accurate picture of the density of housing in the WUI.*

**Paragraph 5—mid-way add:**

Toxic chemicals—including those in residential construction and home contents—could present public health hazards....

(comment—in the Oakland WUI there is little commercial and industrial use—the area is mostly comprised of residences—but the comment about toxic chemicals and their impact on public health beyond the WUI is in itself a significant local hazard.

**Paragraph 6:** Add *The City of Oakland has inspected 26,000 properties within the VHFHZ of the Oakland Hills since 1994(?) in accordance with state and local fire codes and defensible space requirements to reduce the risk of the spread of wildfire.*

**Page 15=3 last paragraph:**

Property owners of structures within the WUI can take preventive measures to reduce the risk of a wildfire creating a secondary structural fire. Using fire-resistant plants, *maintaining 5 feet of “no burn” space to keep embers from igniting and then 30- 100 feet of defensible space, and providing property hardening* are among the protective measures recommended by the California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2020).

*Comment: The National Fire Protection Association uses 0-5, 5-30 and 30-100 feet as its defensible space criteria. The State of California will be changing its code to reflect this in 2022.*

## **15.2 Hazard Profile**

In the first paragraph, the following should be added: *The street infrastructure in the heavily developed Oakland hills create significant challenges for evacuation and first responder access.*

### **15.2.3 Location**

The description of the state and regional does not reflect Oakland’s situation and seems like boilerplate.

**Under Urban**—there should be detail description of the VFHFZ and HFHZ in the Oakland hills and foothills. Oakland’s WUI isn’t the like the rural areas of the Sierra or the



vacation homes in Tahoe. Take a page out of the proposed Vegetation Management Plan which contains a detailed description of the housing challenges in our City's WUI.

#### **15.2.6 Warning Time**

*Add: The City of Oakland and Alameda County are implementing a warning system using ZoneHaven, designed to alert residents about evacuation 1, 2, 3 hours ahead of a fire.*

*Comment: The 1991 fire with winds up to 60MPH destroyed one house every 11 seconds. With fires starting on the ridgetop with dense housing adjacent, some discussion should cover shorter warning times.*

#### **15.5 Future Trends in Development**

*Comment: current planning codes for new development are not sufficient because they don't take into account the street infrastructure situation. Planners and OFD need to look at adding density along the entire evacuation route, not just on the block where the proposed development is occurring. This also applies to the proposed Accessory Dwelling Ordinance.*

*There should be more attention to describing a wildfire in the densely populated Oakland hills—where the fire can spread rapidly from house to house and evacuation is compromised.*

#### **15.7 Issues**

*Add: Street infrastructure complicates evacuation-- too many narrow streets with growing numbers of people and cars. There needs to be strict planning oversight to avoid making matters worse. And frequent and engaging public education so residents know themselves when to leave (not just wait for mandatory orders) to avoid traffic jams during evacuations. Appropriate evacuation behavior: take 1 car, carpool.*

### **Chapter 16 Climate Change**

#### **16.2.4 Wildfire**

The following summarizes changes in exposure and vulnerability to the wildfire hazard resulting from climate change:



- **Population**—*California’s Fourth Climate Change Assessment – North Coast Regional Report* states that “wildfires will continue to be a major disturbance in the region. Future wildfire projections suggest a longer fire season, an increase in wildfire frequency, and an expansion of the area susceptible to fire.”
- **Property and Critical facilities**—The exposure and vulnerability of property and critical facilities ~~would be the same.~~ *would increase (at least in terms of wildfire risk)*
- **Environment**— It is possible that the exposure and vulnerability of the environment will be impacted by changes in wildfire risk due to climate change. **Natural fire regimes may change**, resulting in more or less frequent or higher intensity burns. These impacts may alter the composition of the ecosystems in areas in and surrounding planning area. If more acres are burned every year, wildlife may be more stressed as the suitable habitat is lost.
- **Economy**—If more acres of ~~timber~~ *homes and vegetation* burn every year, the local economy may be impacted. Secondary impacts, such as decreased air quality and visibility, may also impact the local economy.

*Comment: Oakland is not a forest, our risk has to do with homes in the WUI. And as the 1991 Firestorm proves that large wildfires significantly impact the economy*

### **Chapter 18 Risk Ranking**

*Comment: I believe the risk of wildfire is much higher than presented in this paper—and certainly a ranking of 33 is closer to 39 than 24—placing wildfire at high risk rather than medium.*

#### *Table 18-4*

*Wildfire is given a low impact factor on economy, but in 1991, loss from property taxes and other city revenue put Oakland into a mini recession. I believe the analysis is not accurate.*

*Furthermore, this analysis does not take into account the City Council’s resolution making wildfire a city-wide priority.*

### **Chapter 19 Hazard Mitigation Mission Statement, Goals and Objectives**

**Amend #2 to say:** -- Increase public awareness of and the prevention and preparedness for risks, *tailored to the communities where the risk of specific hazards are high.*



### 19.03 Objectives

**Add: 18** In accordance with Council Resolution No. 87940 (2019) make wildfire prevention a city-wide priority

### 20. Mitigation Best Practices

#### 20.2 Adaptive Capacity amend:

Focus planning and intervention programs on neighborhoods that currently experience social or environmental injustice, *bear a disproportionate burden of potential public health impacts or are at high risk of impact from a particular hazard.*

*And add: Make Wildfire Prevention a city-wide priority, with outreach efforts to encourage property owners throughout the city to create no-burn zones within 5 feet of structures.*

### 21.2 Action Plan

*0-5 This is just a repeat of annual vegetation management—there needs to be a broader effort as OFSC proposed under our Alternative 5 in the draft Vegetation Management Plan to bring the LHMP up to date with current fire risk conditions.*

A handwritten signature in black ink that reads "Susan G. Piper". The signature is written in a cursive style.

Susan G. Piper  
Chair  
Oakland Firesafe Council