



March 3, 2021

RE SB 9 and SB10

As residents of neighborhoods in the very high fire risk severity zones of the Oakland and Alameda County (otherwise known as the Wildland Urban Interface Intermix), the Oakland Firesafe Council has grave concerns about the fast tracking of legislative review of SB 9 without consideration of the impact on evacuation before and during a wildfire. The bill it is currently constructed, does not take into consideration the unintended consequences of increasing housing density in communities that are already at high risk for wildfires.

Evacuating residents from these communities is already tricky and complex. If the call to evacuate is not made early, a wind-driven wildfire will overtake the evacuees. (Try outrunning a wildfire that spreads at 11 football fields a minute, as was the case in 1991. The Camp Fire in 2018 spread a football field a second!)

UC researcher Bingyu Zhao recently completed a study on "[Urban density effect on wildfire evacuation](#)" focused on the Berkeley Hills using 1991 Tunnel Fire data, where one house was destroyed every 11 seconds. Her conclusion was that **the numbers of vehicles exposed to fire and the time to safely evacuate all the residents both increase significantly as the numbers of vehicles increase.**

Using her study, if each household evacuated using only 1 vehicle, then 245 vehicles would be on the frontier of the fire, and the estimated time of evacuation would be 2 hours if not longer. In 1991, most of the deaths occurred from people in exposed vehicle on a blocked street. Knowing that the most recent fires in California moved much faster, 2 hours evacuation time is unrealistic.

It's bad enough to try to evacuate hundreds of homes with just one car; the time it takes for people to get to safety increases significantly when there are more cars trying to leave all at once, whether the roads are narrow or typical two-way residential streets. It's not about parking spaces per unit, or whether homes are hardened or not. It's about the capacity of the street to handle so many cars when time is of the essence.

As it now stands, this legislation is in direct conflict with the priorities established by the [National Cohesive Wildland Fire Management Strategy](#), released in the fall of 2020 under the leadership of the US Department of Agriculture and the US Department of the Interior. Their second priority, after managing vegetation and fuels, is protecting homes, communities and other values at risk. One of the strategies is to *pursue municipal, county, and state building and*



zoning codes and ordinances that mitigate fire risk to protect life and property from wildfire. Implementing SB9 without addressing the very real public safety issues of the very high fire risk severity zones in California is irresponsible. It is also unreasonable given the fire history in these severity zones.

Elected officials at all levels need to recognize that increasing density in an area that is already at high risk for wildfire creates a serious legal and financial liability for cities, counties and the state, should a wildfire occur. Yes, there is a need for more affordable housing, but placing more people in areas that we already know are at high risk for wildfires is not a judicious—nor safe--move.

Therefore, we respectfully request that the bill include wording to exclude neighborhoods located in very high fire risk severity zones as designated by CalFire. Perhaps inserting the exclusion now written into SB 10:

- Shall not apply to parcels located within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within a high or very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code.
- Any modifications of single-family homes to multiple units, whether in the very high fire risk severity zone or not, would require review by the local Fire Marshal.

We work very hard to keep our residents engaged in creating defensible space, hardening their homes, and preparing for evacuations and we appreciate your consideration of our challenges

Sincerely,

A handwritten signature in black ink that reads "Susan G. Piper".

Susan G. Piper
Chair

Oakland Firesafe Council

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