

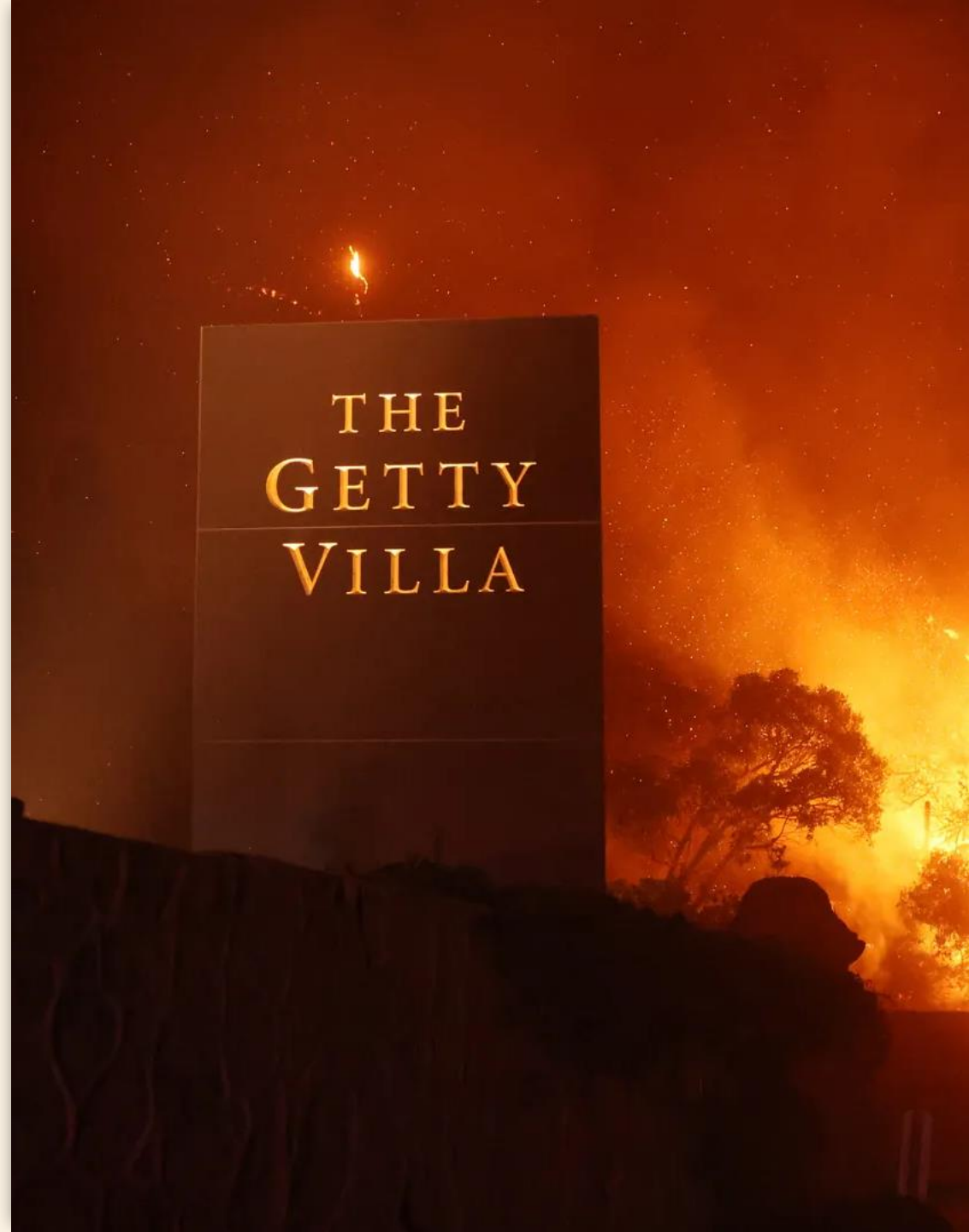
Request for Emergency Moratorium on New Construction in Very High Fire Hazard Severity Zones

Palisades & Eaton Fires – Is San Diego Next?

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Growing Threat of Wildfires in Urban Areas

- Devastating fires in Pacific Palisades and Pasadena/Altadena highlight an urgent need for action in San Diego.
 - San Diego's infrastructure, climate, and resources mirror Los Angeles, making us equally vulnerable.
 - The Normal Heights fire of 1985 demonstrated the catastrophic potential of wildfires within San Diego's urban areas.
- Extreme wildfire is not limited to sparsely populated rural towns.



What Are Very High Fire Hazard Severity Zones?

- Defined by the State of California's Office of the State Fire Marshal
- Fire Hazard Severity Zones fall into one of the following classifications:
 - Moderate
 - High
 - **Very High (VHFHSZ)**
- California laws that require Fire Hazard Severity Zones include
 - California Public Resources Code 4201-4204
 - California Code of Regulations Title 14 Section 1280
 - California Government Code 51175-89
- These are areas with extreme fire risk due to vegetation, topography, and weather conditions.
- San Diego has significant portions of land classified as VHFHSZ.

Palisades Fire Quotes



“Due to gridlock during evacuation, police instructed residents to ‘Get out of your car, run for your life, and head toward the ocean.’”

– **Ellen Bacher**, LA resident



“I don’t know a water system in the world that is that prepared for this type of event” – **Dr. Greg Pierce**, Director, UCLA Water Resources Group @ Institute of the Environment and Sustainability



“Pacific Palisades is at the far end of the municipal water system where pipe sizes extended from the main line are smaller.”

– **Janisse Quiñones**, CEO and Chief Engineer LADWP



“Local governments have a responsibility to address wildfire risks associated with new development projects early in the planning process when changes to these projects can still be made,” – **Rob Bonta** CA Attorney General

San Diego's Risk Profile Mirrors Los Angeles



Climate Conditions

Prolonged droughts
Santa Ana winds
High temperatures



Vulnerable Infrastructure

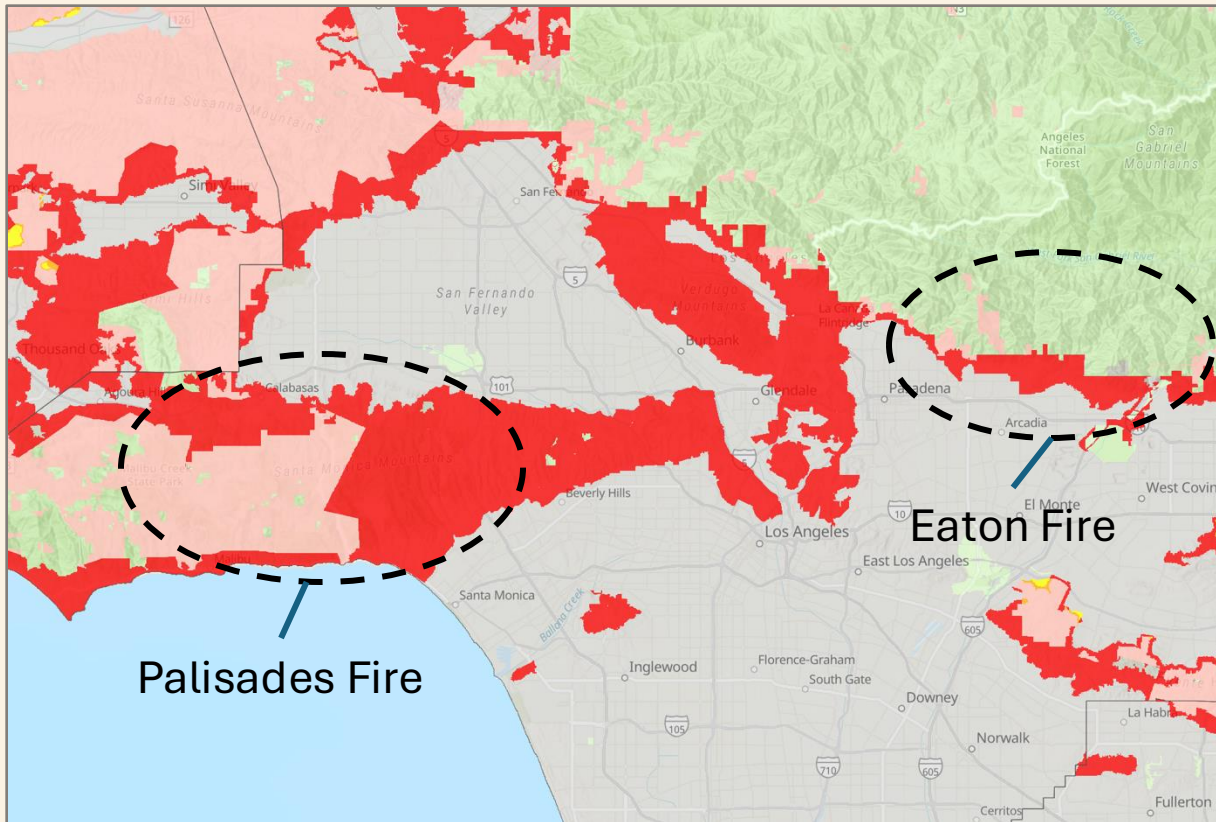
Aging water delivery
Limited evacuation routes
Dense urban areas



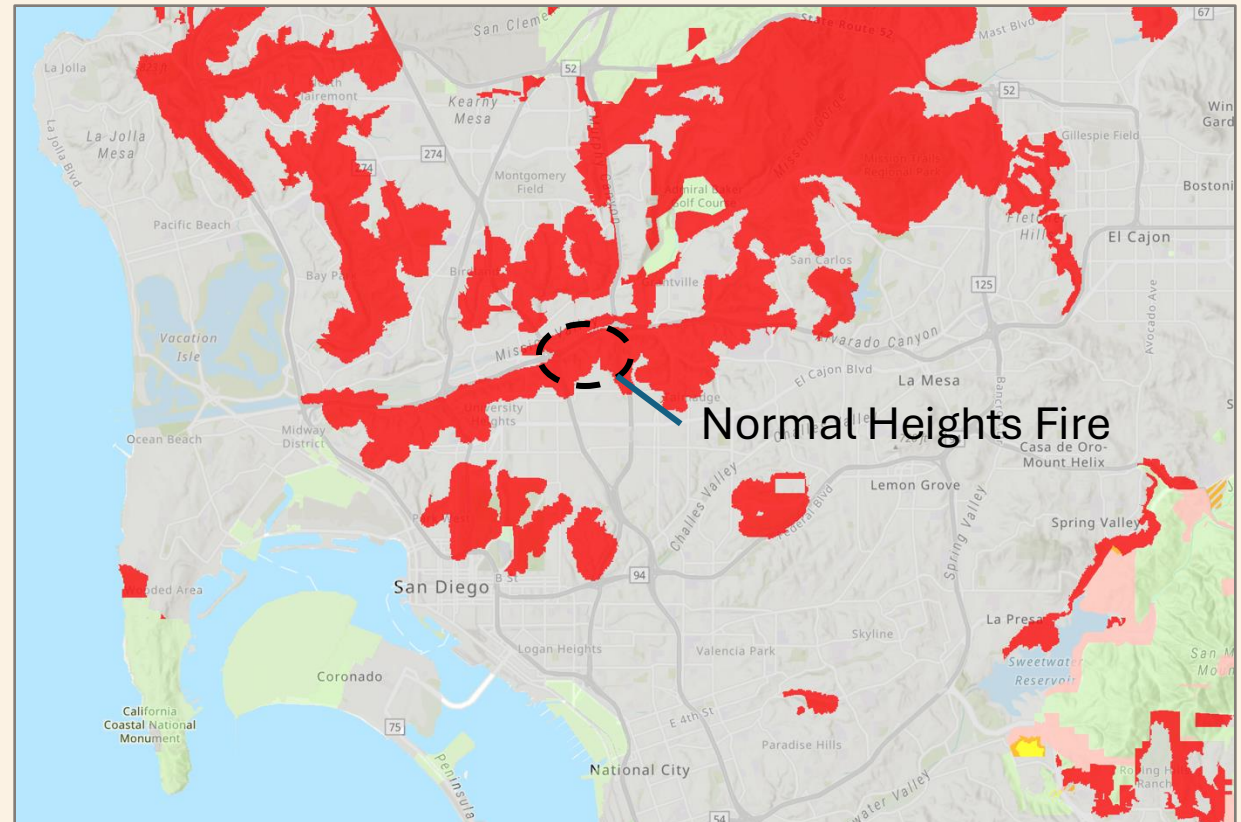
Resource Constraints

Not equipped for extreme conditions
Aerial support grounded in high wind
External resource response time

VHFHSZ Los Angeles & San Diego



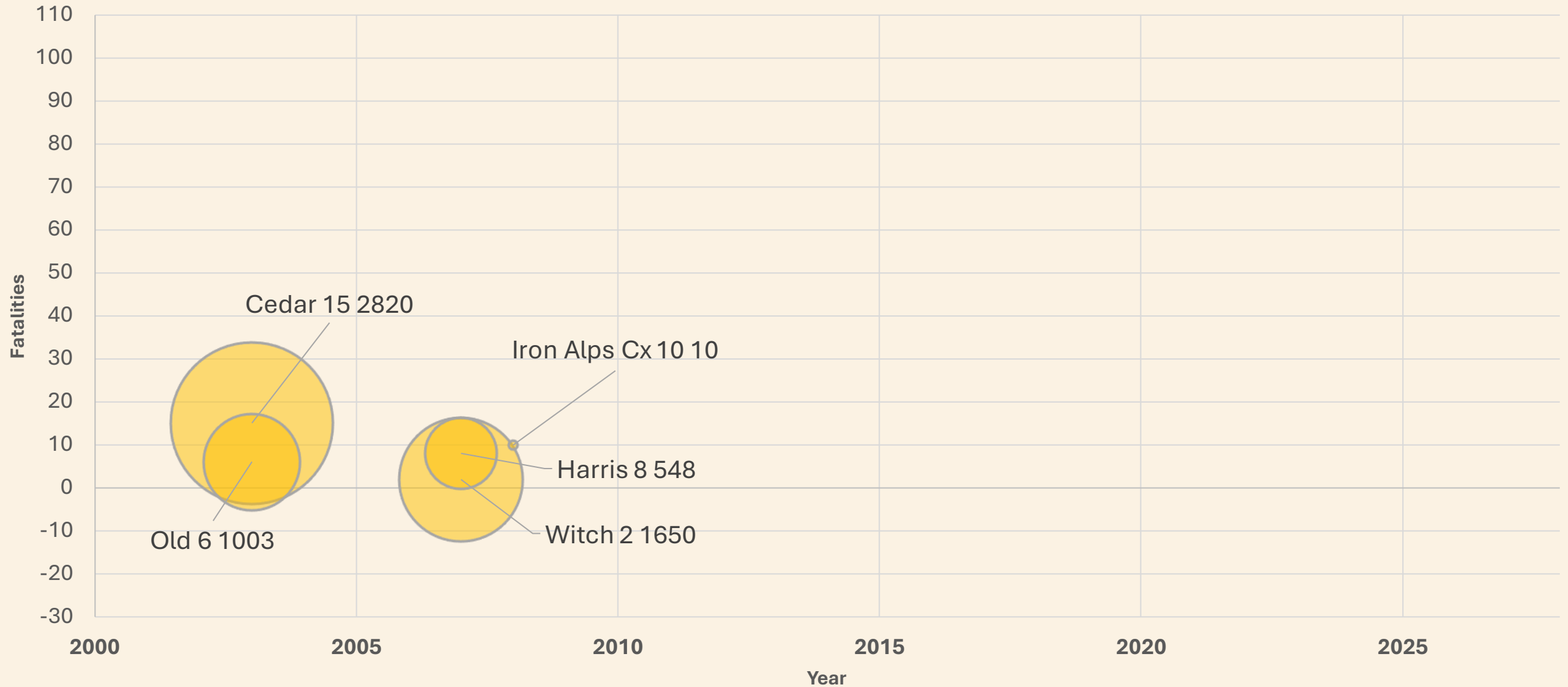
Zones are mostly around foothills



Zones are mostly around canyons

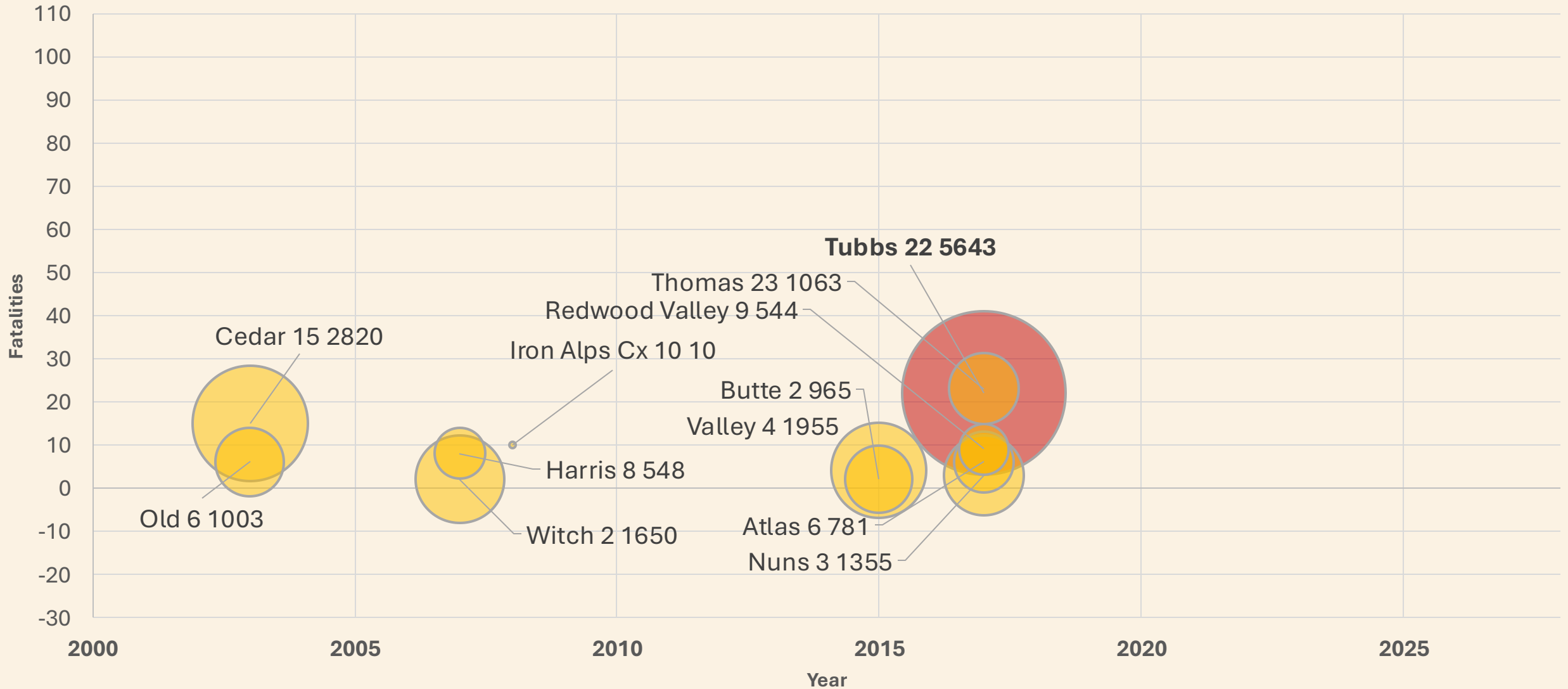
Life and Property Cost Trends

Large Wildfire Structures Destroyed and Fatalities Over Time



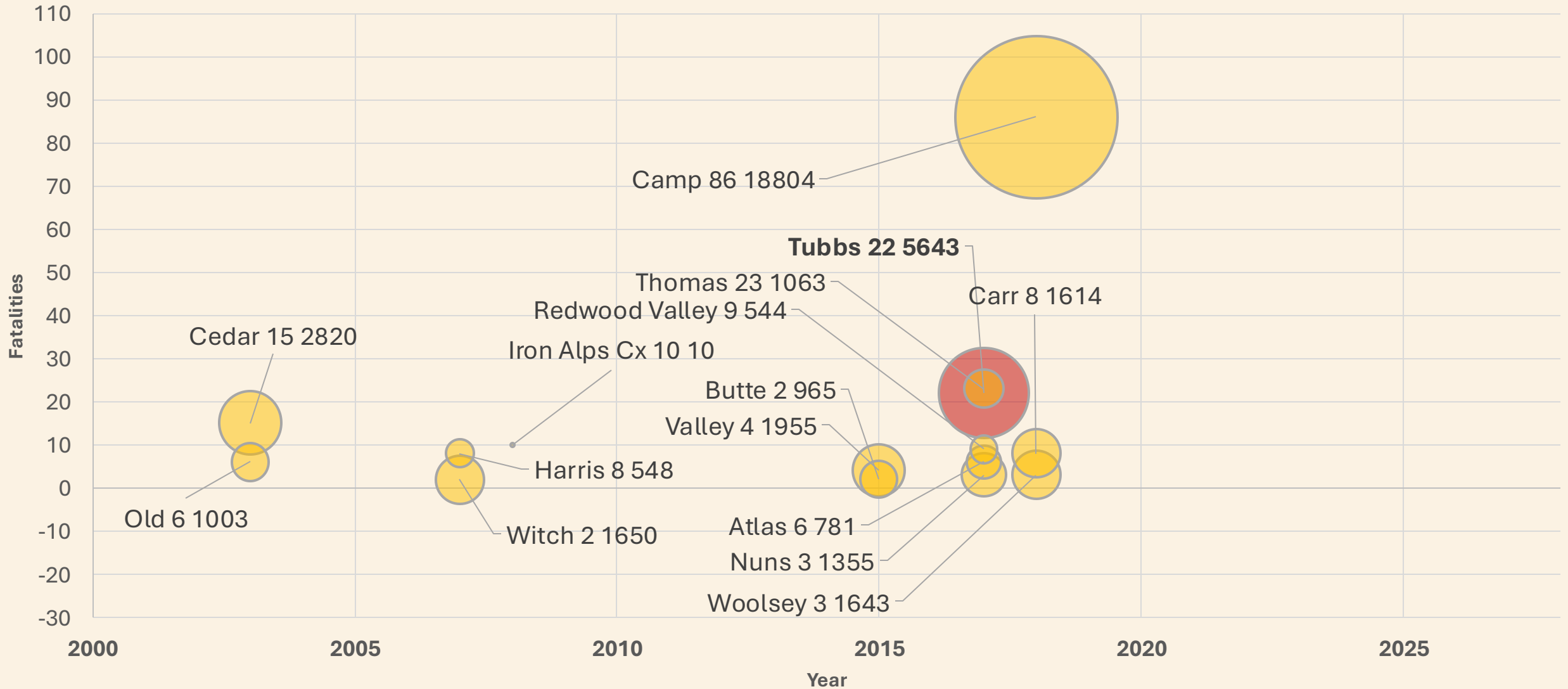
Life and Property Cost Trends

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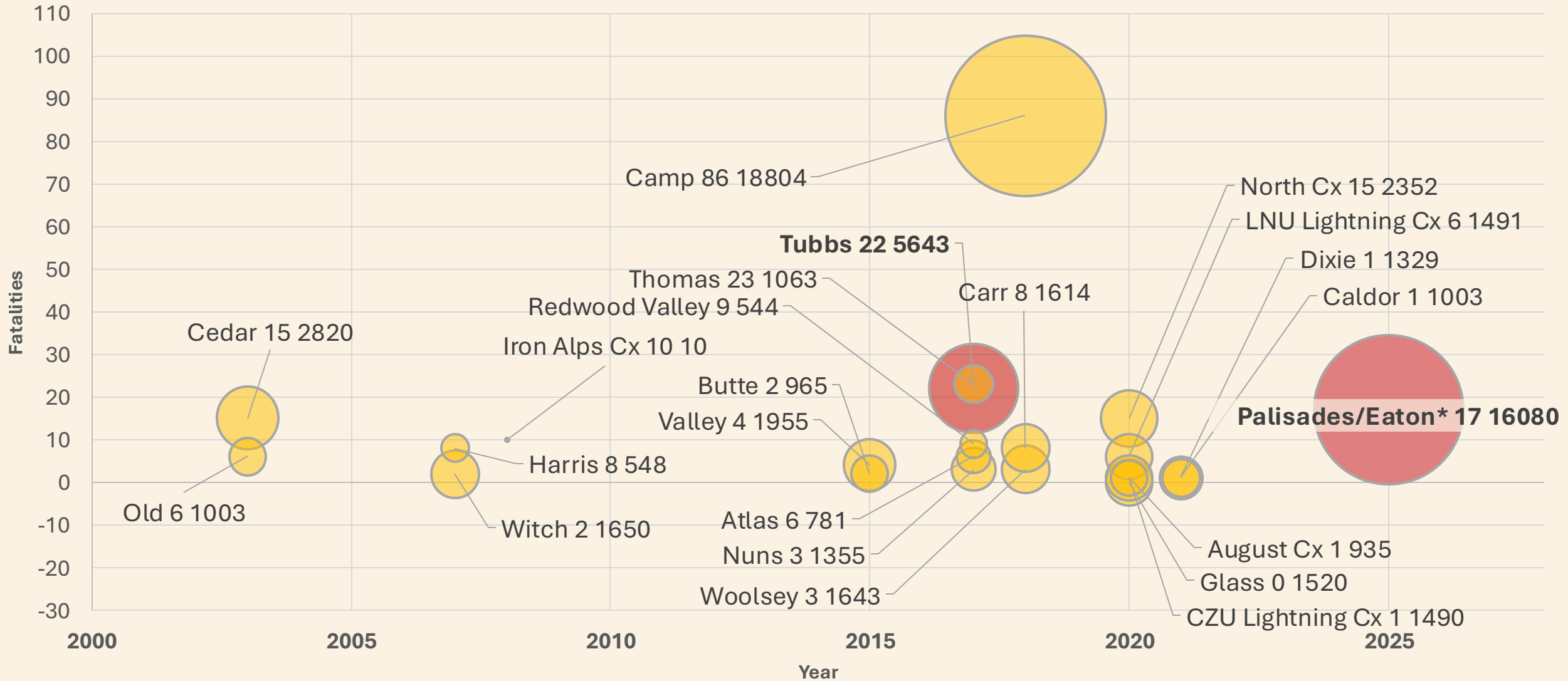
Life and Property Cost Trends

Large Wildfire Structures Destroyed and Fatalities Over Time



Life and Property Cost Trends

Large Wildfire Structures Destroyed and Fatalities Over Time



1985 Normal Heights Fire: A Warning Ignored

- Destroyed 76 houses and damaged 57.
- Better firebreak management, infrastructure updates, and evacuation planning were promised.
- Many of these measures remain unfulfilled 40 years later.
- San Diego has a history of missing infrastructure goals.
- MEANWHILE...
 - Infill construction continues in VHFHSZs.
 - Increases in population impact existing infrastructure and evacuation routes.

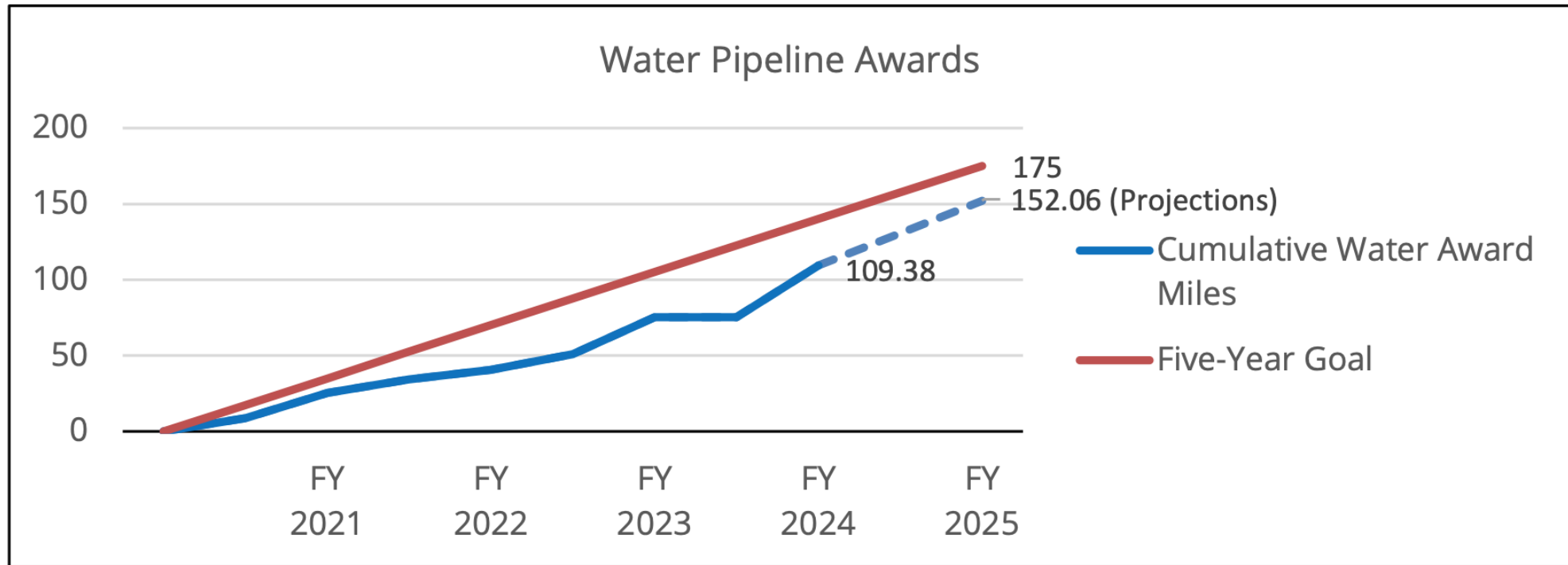
Let's Talk Infrastructure

Water Infrastructure Backlog

Public Utilities Department Water Prioritization 2013

- 10 miles of cast-iron mains in the City are decades old and present significant integrity issues.

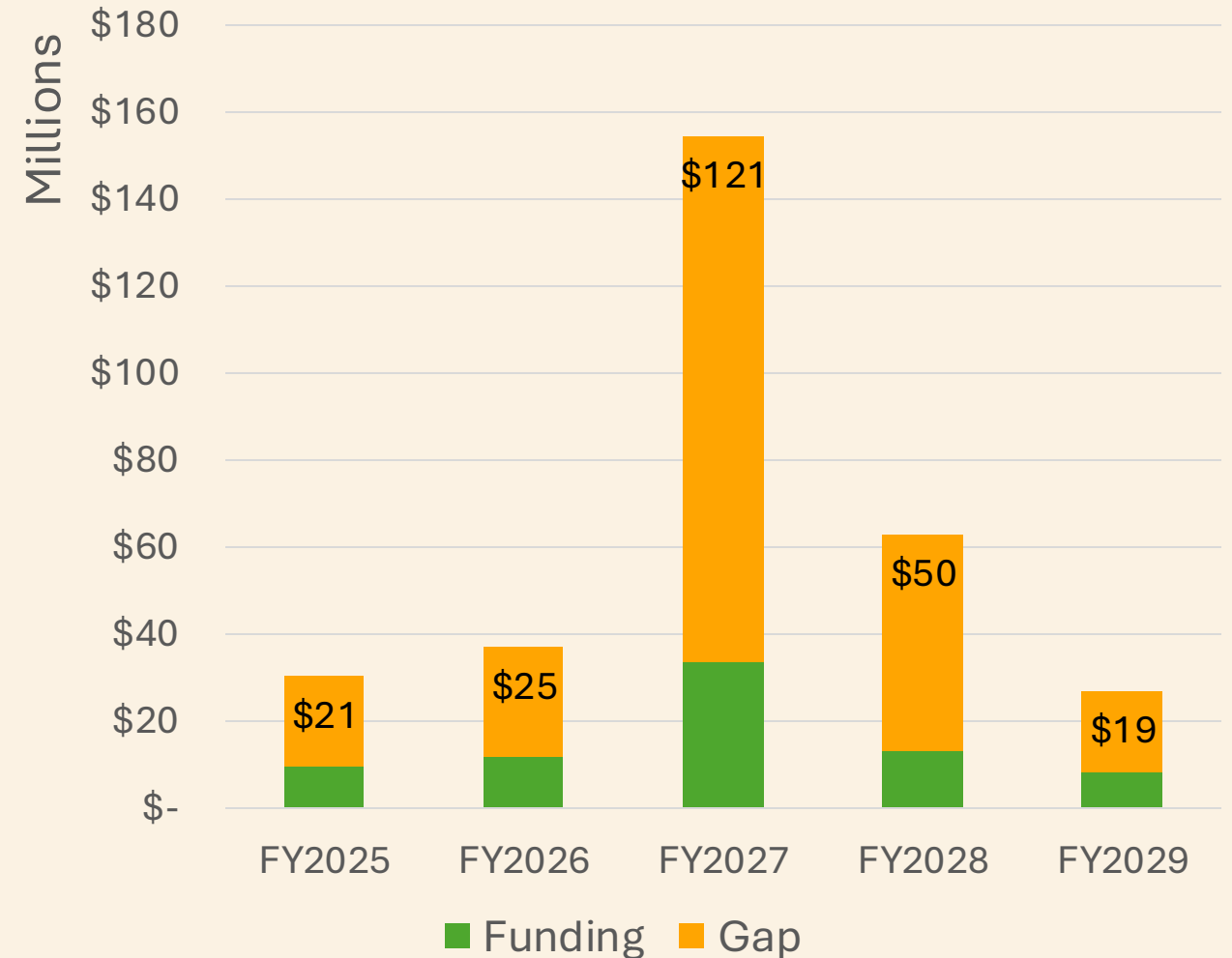
Figure 9 - Water Main Replacement Contracts



Fire Station Backlog

- Fiscal Year 2025-2029 Five-Year Capital Infrastructure Planning Outlook
 - “The most recent facilities condition assessments ... completed between Fiscal Year 2014 and Fiscal Year 2016. Many of the needs remain to be addressed.”
- Fire Station Funding Gap
 - Funding Sources: Otay Mesa EIFD, Community DIF, Citywide DIF, Financing, and Infrastructure Fund
 - Five Year Total Deficit = \$235.7 Million

Projected Funding and Gap



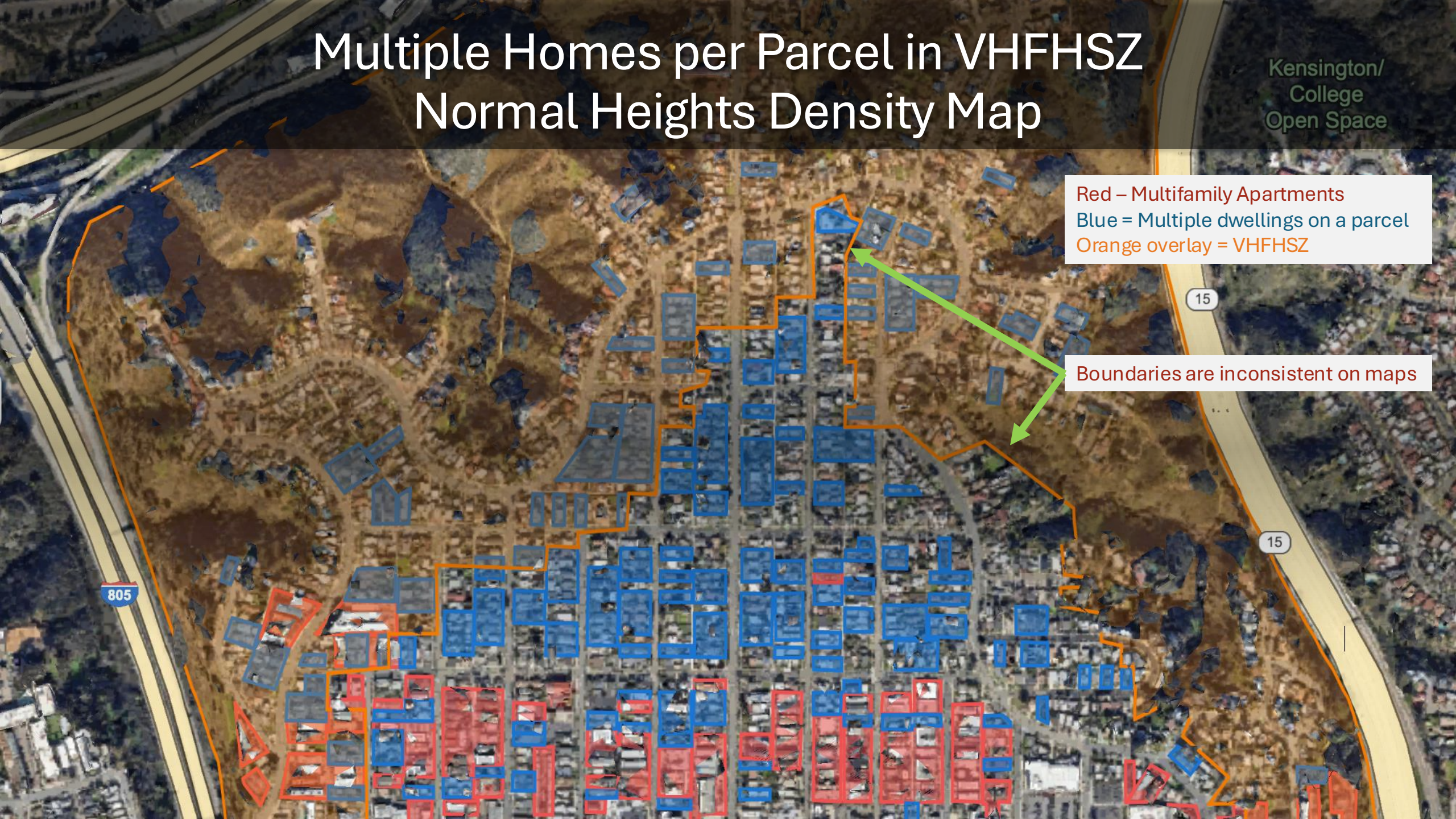
Density within VHFHSZ: Current State of Affairs

Multiple Homes per Parcel in VHFHSZ Normal Heights Density Map

Kensington/
College
Open Space

Red – Multifamily Apartments
Blue = Multiple dwellings on a parcel
Orange overlay = VHFHSZ

Boundaries are inconsistent on maps



Planned Density Increase Example

4973

PRJ-694829 06/30/2021
Building permit for new detached-ADU w/ Car Garages
In VHFHSZ

Canyon Wildland

4963

4961

4951

PRJ-1119337 07/9/2024
Building permit for new 3-story (8) unit MDU building with bonus ADUs
Oddly outside VHFHSZ despite being directly on canyon

4945

Planned Density Increase Example

PRJ-1123940 09/26/2024

Building permit for (4) 2-story buildings: 1 SDU+ 1 ADU + 6 ADUs
In VHFHSZ

Clear. Site 535

FitFusion

Only 2 routes for evacuation exist and interface wildland on east and west sides



Density Incentives

All San Diego density incentive programs may be used in VHFHSZ when built following California Building Code Chapter 7A

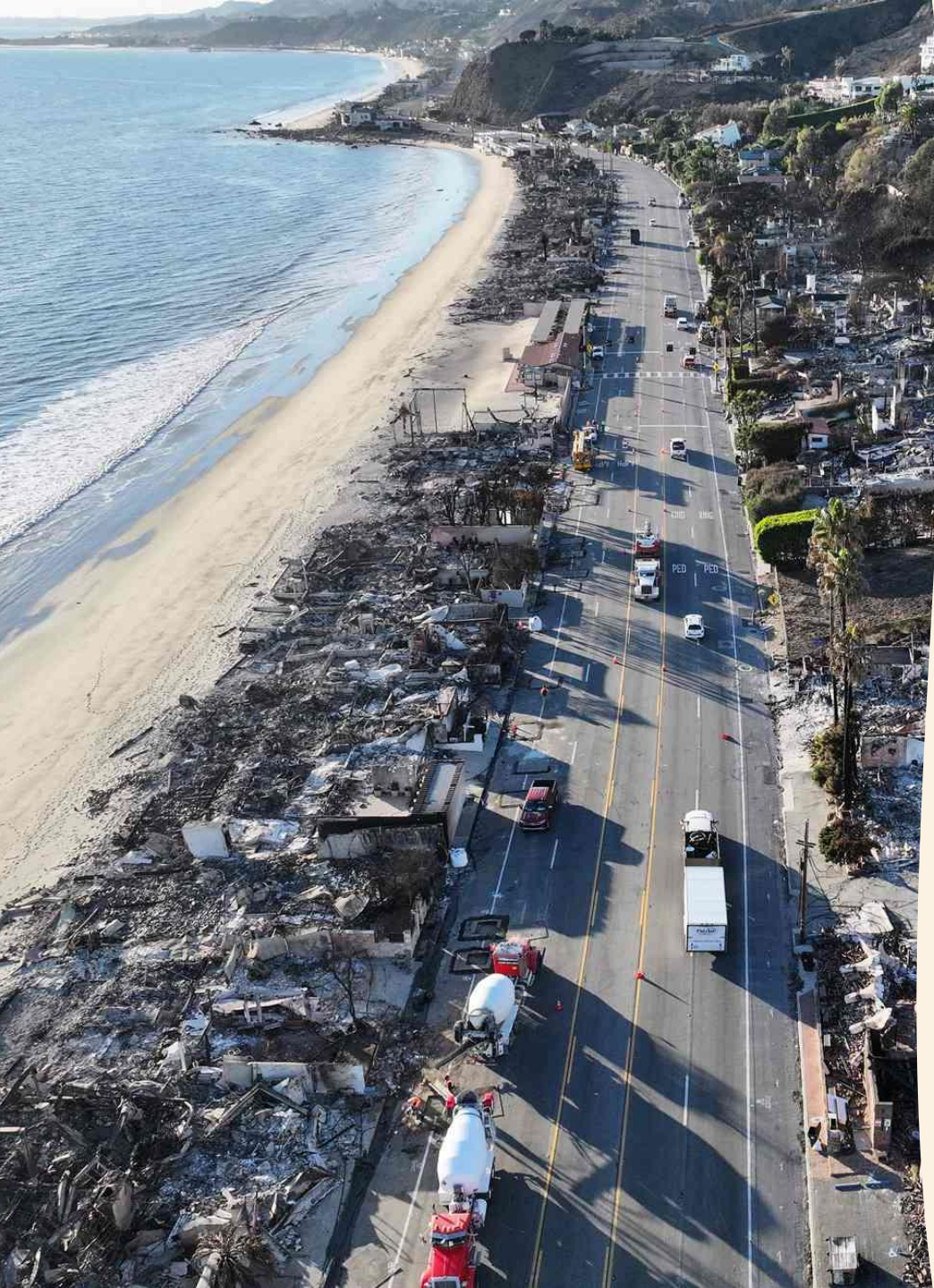
- Affordable Homes Density Bonus Program
- 100-Percent Affordable Density Bonus Program
- Accessory Dwelling Unit (ADU) Bonus Program
 - Also eliminates or reduces setbacks between homes accelerating risk of fire spread.
- Complete Communities Housing Solutions
- SB9 Lot Splitting
 - Must also comply with Public Resources Code §51182
 - Adds defensible space, vegetation management, road access, and water supply to requirements.

Chapter 7A: Materials and Construction Methods For Exterior Wildfire Exposure

- Chapter 7A of the California Building Code pertains to fire and life safety provisions for buildings and structures.
 - Fire Protection Systems (fire alarms, sprinklers, smoke detectors)
 - Fire-Resistant Materials (burn time)
 - Means of Egress (evacuation routes from building only)
 - Fire-Resistant Construction (compartmentalization in walls)
 - Occupancy-Specific Requirements (standards based on use)
- Adopted in 2005
 - Applies only for roofing for homes built 2005 to 2008
 - Applies only to new construction after 2008.
 - Older homes are not commonly built to this standard.

Chapter 7A: Limitations

- 7A is intended to “resist building ignition and/or safeguard against the intrusion of flames resulting from small ember and short-term direct flame contact exposure.”
- Direct flame exposure requirements:
 - Exterior Wall Siding and Sheathing: 10 minutes.
 - Exterior Windows: 8 minutes.
 - Horizontal Projection: 10 minutes.
- ADU on parcels with older homes only require the new construction to be 7A compliant. No retrofits are required.



Density as Risk Multiplier

- U.S. Forest Service study on Housing arrangement and vegetation factors associated with single-family home survival in the 2018 Camp Fire found an 11.5% survival rate for homes built prior to 1997
- Predictors include
 - Distance to nearest destroyed structure
 - Number of structures destroyed within 100 meters
 - Pre-fire overstory canopy cover within 100 meters

Evacuation



- In case of wildfire, evacuation is always the best course.
- However, recent examples show that, without proper city planning, this is not always possible
 - Routes may be grid locked (Palisades Fire)
 - Police may be unavailable for traffic control due to competing priorities (Montezuma Fire)
 - Pole mounted utilities create a risk of being downed and blocking evacuation routes.
 - Those without access to cars may have difficulty evacuating.
 - Non-car owning urbanites
 - Elderly and/or impaired that cannot drive.
 - Transient populations e.g., tourists
 - Homeless

When Residents Are Unable to Evacuate: The Sheltering in Place Approach

- **New** planned communities may build to specific standards that allow residents unable to evacuate during a wildfire to shelter in place.
- The **entire** community must be designed to withstand heat and flames from an approaching wildfire.
 - Well-maintained, fire district approved landscape and vegetation management plan.
 - Roadway and driveway widths designed to accommodate two-way traffic and large firefighting apparatus.
 - Adequate water supply and water flow for firefighting efforts.
 - Vegetation modification zones surrounding the community.
- This approach is not feasible in existing older communities.

Protect San Diego

- Whereas
 - Wildfires are an immediate threat to San Diego
 - Evidence from Palisades and Eaton Fires demonstrate extreme risk
 - Current fire infrastructure in San Diego cannot mitigate this risk
- The residents of San Diego request that the City of San Diego
 - Place an emergency moratorium on all infill construction projects in Very High Fire Hazard Severity Zones within the City of San Diego until comprehensive risk assessments and mitigations are completed.