

## Wildland Urban Interface Code

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This perspective is a combination of experience as a prescribed burn practitioner, local government employee, and City of Austin taxpayer. This is a rapid review of the documentation provided and general but limited general knowledge of the overall issues.

1. There was insufficient time to review the information and consider its impacts. This is a substantial project and should be fully explained, discussed, and vetted by all stakeholders.
2. The project should be reconsidered in light of the need to review the CWPP (its nearing its five year mark), the delay of Code Next, and the recent revenue cap discussions and legislation.
3. The project implementation and/or design should be delayed and/or reconsidered because the background data and mapping may be inaccurate, the code is too complicated, the implementation costs are high, and the scope is too narrow.

### Accuracy

- The project is dependent on good data to be implemented. There is limited fuels data to support the fire risk map that has been developed. The existing data is 10 years old.
- The custom fuel models developed for the northwestern portion of the county were developed with limited data and for a different purpose. They were also developed before the widespread adoption of the new national fuel models.
- There must be confidence in the risk map for the project to be implemented. The fire risk map has not been adequately reviewed or vetted by stakeholders.
- *There is limited consensus in how fire behaves in local fuels types, what those local fuel types are, and what treatment and/or protection strategies are warranted in the different fuel types. This professional consensus is required to implement this strategy effectively*

### Complexity

- The data is insufficient to accurately predict the risk that the code requires.
- The code will require frequent data collection and analysis to implement. The data, to include the fuels data layer, proximity data, parcel sizes etc., will need to be updated frequently. The code will require routine inspections to ensure compliance. If this includes mowing and/or leaf removal that could require multiple trips to a structure each year.
- An inspector with significant wildland fire and/or ecology background would be required to implement the project. That capacity is limited.

- It seems likely that the risk is going to increase in the future so the development of a simple code with a single, conservative protection standard would likely provide the most benefit. A focus on the building codes would be easier to implement.

#### Expense

- If adopted as part of the WUI Code this will require significant fire department resources to implement. The department is perennially understaffed, particularly in inspections, and the cost will be high.

- The cost of routine data collection and analysis will be high.
- Consider simplifying the code and removing from WUI Code so that the goals could be accomplished by Code Compliance or another work group at a lower cost. The cost savings could be used to accomplish other objectives-hire a Fire Ecologist to address fuels issues, hire a CWPP coordinator to develop local-level CWPP, hire a PARAD Burn Boss and Crew to treat City Owned Property, etc.

#### Scope

- This project has a very narrow scope. It will only address a small portion of the landscape and fire management challenges.
- The project appears directed at providing defensible space. This is a strategy that may be effective at fires under the 90<sup>th</sup> percentile. It will provide limited for more extreme fire events. This should be communicated in the code.
- If we want to adequately address fire management challenges then all properties should be considered to include existing commercial and residential structures, critical infrastructure and government facilities, and public and private open space.