
From: Marcia Fariss [REDACTED]
Sent: Thursday, July 22, 2021 9:19 AM
To: Regional Housing Need Allocation
Subject: RHNA mandates

External Email

For any small, already built out city, RHNA demands for housing are totally unrealistic! I live in such a small city, (Saratoga) with minimal City Services, little commercial facilities, no major transportation, few job opportunities, limited infrastructure and most importantly, and no available space for new housing.

This and other similar existing communities have no ability to meet the RHNA housing requirements! RHNA needs to re-evaluate it's cookie cutter demands and seriously downsize its demands for housing in small, semi-rural built out cities such as Saratoga, Los Altos Hills, Los Gatos, etc.

There is absolutely no way Saratoga and other similar small cities can absorb the RHNA demands. RHNA needs to be realistic and work with the cities that cannot support their unfounded, unrealistic expectations.

M. Fariss
[REDACTED]

To: ABAG Administrative Committee

August 4, 2021

From: Neal Mielke, [REDACTED]

Subject: Comments supporting the RHNA appeal from Los Altos Hills

I am writing to support, and amplify, the wildfire-related objections that the Town of Los Altos Hills has raised in its RHNA appeal. The RHNA plan's push for ADUs in a high-risk WUI area like Los Altos Hills threatens a perfect storm of worsening wildfire risk. It is irresponsible.

Building more housing in WUI areas is ill-considered even in the best of circumstances. Who says so? The state of California, which has sued to stop new developments in high-risk areas, such as Guenoc Valley in Lake County, even though *new* developments can be planned from the get-go to meet the most modern standards and principles for home construction, home spacing, fuel breaks, and roads. It is far more dangerous to shoehorn ADU's into an area developed decades ago to looser standards and which is riddled with violations of modern standards.

Our roads are narrow, windy, often dead-end, and lack fire-truck turnarounds. The vast majority of our homes were built decades before R337/7A building standards were developed. Wood siding remains common. We have 30-foot setback limits, which do indeed conform to modern fire standards, but the insertion of an ADU immediately violates those standards. Trees and landscaping were put in place decades before vegetation spacing priorities were well understood. Insurance companies are cancelling policies here.

It is important to understand that the largest source of fuel in a suburban neighborhood is the homes themselves. That is the case *even with* the most modern construction standards. Cal Fire reports that half the homes built to full Chapter 7A standards nevertheless burned in the Tubbs and Camp fires. When one home goes up in flames, fire experts say that with substandard spacing the adjacent one is almost guaranteed to burn. That will be particularly true with ADUs, which by necessity must be crammed into the main home's defensible-space area. On top of this, adding population to an area with substandard roads is a threat to evacuation and emergency-vehicle access.

The galling thing is that ABAG officials know this. One of your committee members has said publicly that Los Altos Hills is already too crowded for comfort when it comes to wildfire. ABAG's exemption for Cal Fire's very-high-hazard zone is an admission that building more housing in risky areas would be wrong. ABAG must realize, from the Tubbs fire, that unacceptable wildfire risk is not limited to the very-high-hazard tier. Surely ABAG officials also know that housing decisions today will determine the housing in place in coming decades, when continued climate change will cause the wildfire risk to be even higher. Yet ABAG has chosen to double-down on the wildfire risk.

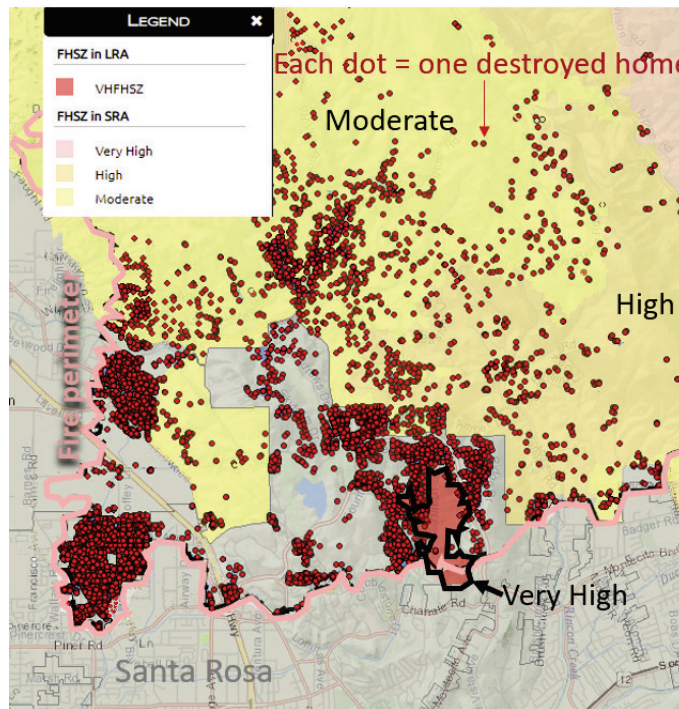
These points represent established fire science and expert opinion, as shown in the attached pages. Please address the reality of wildfire risk in the RHNA allocations. Please do not add fuel to the already-increasing wildfire risk posed to our properties and lives.

Thank you for your consideration.

ABAG's exclusion of the very-high-hazard tier and county-designated WUI is just lip service

ABAG's handling of wildfire risk misses the mark, badly. Let me quote from ABAG's RHNA Plan: *The Final Blueprint Growth Geographies exclude CAL FIRE designated "Very High" fire severity areas as well as county-designated wildland-urban interfaces (WUIs) where applicable.*

The first problem with that statement is that drawing the line at the "very high" tier ignores the very real and growing risk in the "high" tier. Below is a map showing where 3000 Santa Rosa homes were destroyed by the 2017 Tubbs fire, plus about 2000 more in the adjoining state responsibility area. Drawing the line at the "very high" level would ignore the fire risk everywhere except in the one tiny outlined area. This is lip service, not action. There are many areas around the Bay Area, including Los Altos Hills, which have high risk for wildfire but are not designated by Cal Fire as being in the "very high" category. As bad as Tubbs was, what will the fire regime be like in another 10, 20, or 30 years?



The second problem in ABAG's statement is the Catch-22 in the WUI statement, about *county-designated* WUI areas. Here in Los Altos Hills, and I believe other incorporated cities and towns, it is the city or town's responsibility to designate WUI, not the county's. According to the Santa Clara County FireSafe Council, most of Los Altos Hills is WUI, but that is not a county designation. And ABAG's large RHNA numbers for Los Altos Hills clearly indicate that the reality of WUI here has been ignored. ABAG's WUI clause is more lip service rather than responsible action. If, as ABAG says, WUI areas should be excluded, then exclude WUI areas regardless of jurisdictional boundaries.

Fire risk in Los Altos Hills is high

The NFPA 1144 community risk assessment completed for the Los Altos Hills Community assigned the WUI community a risk rating of High with a score of 88 (<40= low, >40 = moderate, >70 = High, >112 = Extreme).

Santa Clara County Wildfire Protection Plan, 2016

Los Altos Hills is so cramped. It's hard to get to. If we have a wildfire there, that is INCREDIBLY dangerous.¹

Cindy Chavez, Santa Clara Supervisor and member of the ABAG Administrative Committee

I was looking at the map the other day. In looking at the SCU fire, man, that burned 50 miles. And think about that length, that 50 miles. And now, put it where the Lexington fire burned. That's a fire from south county all the way up into Los Altos. And we have not had measurable fire to the west side of the county for some years. So the fuels that you're seeing on this [east] side, yes, it continues to be a problem, but you have similar conditions with heavier timber and a heck of a lot more homes on the whole west side of this county, from south county all the way up into Palo Alto". So, there is a significant risk. We were very, very concerned that the CZU fire would bump up against Skyline. It didn't. We were very fortunate. The weather cooperated towards the end. But that remains two areas that have significant fire threat.

Tony Bowden, Fire Chief of the Santa Clara County Fire Department²

Simply put, fire authorities say that Los Altos Hills has high fire risk. An ABAG member says that Los Altos Hills is already too crowded for comfort when wildfire is considered. Insurance companies clearly think that the risk is unacceptable, since they have been cancelling fire insurance policies here. What justification does ABAG have for treating Los Altos Hills as if it had zero risk?

Housing densification worsens wildfire risk

It is well known that a prominent cause of California's wildfire disasters has been the building of homes in high-risk areas. Some fire experts have said that such areas should never have been built in, period. Whether one would go that far or not, there are several reasons why densifying housing in such areas means doubling down on the risk:

- 1) Denser housing means more people would live in high-risk areas, often with inadequate insurance because of the insurance cancellation problem.
- 2) Denser housing means more fuel and structure-to-structure fire spread, and less defensible space
- 3) Evacuation and emergency vehicle access are more difficult with a greater population density, especially in an already-developed area like Los Altos Hills where narrow, often dead-end roads

¹ <http://sccgov.igm2.com/Citizens/SplitView.aspx?Mode=Video&MeetingID=12218&Format=Minutes>, 8-hour mark

² Speaking in reply to Supervisor Cortese at the 9/1/20 Santa Clara County Board of Supervisors meeting

were laid out decades ago based on a low population density, far lower wildfire risk, and far looser safety codes.

These are not made-up excuses. These ideas are built into fire standards and are backed up by experts in the field.

In the suburban and urban setting, the key quantity is the density of houses -- together with the combustible material in these houses -- in determining fuel load and fire behavior.

R. Rehm et al., Building and Fire Research Laboratory of the U.S. National Institute of Standards and Technology, in "Community-Scale Fire Spread", 2002

The high density of flammable structures contributed significantly to the spread and intensity of the Oakland hills fire. Trees did play a role in spreading the fire, but in many cases the trees caught fire from the houses, not vice versa.

Task force on Emergency Preparedness & Community Restoration Final Report, Elihu Harris and Loni Hancock, Mayors of Oakland and Berkeley.

Buildings should be spaced at least 60 feet apart (minimum 30-foot setback) to minimize risk of exposure to an adjacent structural fire and the conflagration potential of the spread of fire from structure to structure.

Federal Emergency Management Agency (FEMA), HAZARD MITIGATION REPORT for the East Bay Fire in the Oakland-Berkeley Hills, FEMA-919-DR-CA

Homes with rooflines closer than 30 feet apart can become ignition sources for one another Homes should not be spaced too closely together. A requirement for homes to have a minimum of 30 feet of clear space from the foundation to the property line on all sides is Firewise-friendly.

Firewise USA, "Safer from the Start", 2009

If you're in dense neighborhoods, where buildings are less than 30' apart from each other, then you've got radiant heat issues that are additional challenges We've been analyzing the data from Paradise. The biggest predictor of loss is the distance to the nearest lost home.

Yana Valachovic, UC Cooperative Extension, speaking at the California Insurance Commissioner's "Virtual Meeting Regarding Home Hardening and Wildfire Catastrophe Modeling in Ratemaking", 12/10/20

The historic growth of Paradise and surrounding communities, going back over a century, resulted in many structures placed on smaller lots. The short structure separation distances, together with the vegetative fuel loading, enabled rapid structure-to-structure fire spread.

"A Case Study of the Camp Fire – Fire Progression Timeline", U.S. National Institute of Standards and Technology, co-authored by NIST, the USFS, and Cal Fire.

In the Waldo Canyon fire in Colorado, in areas where home-to-home ignition occurred, spacing between homes was typically only 12 feet to 20 feet. The spacing between homes — the housing density — and that interaction with surrounding vegetation has been reviewed by several authors below that all point

to a significant impact on community-wide fire resilience simply by the arrangement and density of structures.

Gollner et al., "Pathways for Building Fire Spread at the Wildland Urban Interface," Fire Protection Research Association

The fundamental problem was that the city had planted structures, as earlier developers had eucalypts, where they didn't belong...

Stephen J. Phyne, "California: A Fire Survey", University of Arizona Press, writing about the Oakland Hills fire

Your property is located in or near a Hazardous Fire Area and requires a defensible space of 30 feet around all structures.

Annual letter from the Santa Clara County Fire Department to all residents of Los Altos Hills

Roadways shall have a minimum clear width of 12 ft for each lane of travel, excluding shoulders. [Note: my own road is narrower than this, and the last quarter mile is a dead-end with only one way out.]

NFPA 1141

Every dead-end roadway more than 300 ft in length shall be provided at the closed end with a turnaround having no less than a 120 ft outside diameter ... a cul-de-sac exceeding 1200 ft in length shall be provided with approved intermediate turnarounds at a maximum of 1200 ft intervals. [Note: My own road, and many others in Los Altos Hills, lack these turnarounds and cannot be retrofitted without property seizure.]

NFPA 1141

The steep narrow streets, now obscured by swirling smoke, were suddenly clogged with cars as falling power lines and flaming brands ignited spot fires, adding to the confusion. Some of the narrow roads were blocked by collisions as panic stricken residents searched for safe escape routes. The body of Oakland Police Officer John Grubensky was found, along with five civilian fatalities, at a narrow point on Charing Cross Road. It appeared that the cars were jammed at this point by a collision in the narrowest part of the road.

U.S. Fire Administration, "The East Bay Hills Fire, Oakland-Berkeley, California," USFA-TR-060

Los Altos Hills is so cramped. It's hard to get to. If we have a wildfire there, that is INCREDIBLY dangerous.

Supervisor and ABAG Representative Cindy Chavez, as quoted earlier.

Supervisor Chavez made a wise observation, that even 1-acre lot sizes make for crowding when the terrain is hilly and the roads are narrow, winding, and often dead-end.

The Final Blueprint Growth Geographies exclude CAL FIRE designated "Very High" fire severity areas as well as county-designated wildland-urban interfaces (WUIs) where applicable.

ABAG's RHNA Plan. Again, this is an admission that housing densification worsens wildfire risk. But then ABAG has resorted to fine print in the exemption, the effect of which is to ignore the fire risk in many communities, and in particular here in Los Altos Hills.