DATE: May 23, 2025

TO: Planning Commission

FROM: Joel Paulson, Community Development Director

SUBJECT: Consider Making a Recommendation to the Town Council to Approve the Fire Hazard Severity Zones Map Ordinance and Resolution to Comply with State Government Code Section 51178 and an Amendment of the General Plan Hazards and Safety Element to Incorporate the Fire Hazard Severity Zones Map. Adoption of this Ordinance and Resolution is Exempt Pursuant to CEQA, Section 15268, in that it is Required by the State. General Plan Amendment Application GP-25-01 and Town Code Amendment A-25-03. **Project Location: Town Wide**. Applicant: Town Of Los Gatos.

RECOMMENDATION:

Forward a recommendation to the Town Council to approve the Fire Hazard Severity Zones Map Ordinance and Resolution to comply with State Government Code Section 51178 and an amendment of the General Plan Hazards and Safety Element to incorporate the Fire Hazard Severity Zones Map.

BACKGROUND:

Prompted by the devastating Oakland Hills Fire of 1991, State Legislation called for the California Department of Forestry and Fire Protection (Cal Fire) to evaluate fire hazard severity in Local Responsibility Areas (LRA) and recommend to the local jurisdictions where Very High FHSZs exist. Cal Fire used an extension of the State Responsibility Area (SRA) FHSZ model to evaluate fire hazard in the LRA, which reflects the flame and ember intrusion from adjacent wildlands and flammable vegetation in the urban area.

On October 16, 2008, the Town of Los Gatos received Cal Fire's final draft FHSZ map, which the Town Council adopted on February 2, 2009. This map has not been updated since its adoption and is still in effect today.

PREPARED BY: Robert Gray
Chief Building Official

Reviewed by: Community Development Director

On May 14, 2025, the General Plan Committee (GPC) considered a request to recommend that the Planning Commission and Town Council approve an ordinance and resolution adopting the new Fire Hazard Severity Zones (FHSZ) map as required by State law. After consideration and discussion, the GPC unanimously recommended approval of the request and recommended adding additional information in future staff reports for improved clarification. These recommendations include providing the current adopted map (Exhibit 6), the proposed map (Exhibit 7), clarification of property owner compliance requirements within the varying zones, information regarding the use of the proposed map by the insurance industry and descriptions of zone designations. Staff discussed the descriptions of zone designations with Santa Clara County Fire Department (SCCFD) and determined there are no specific definitions of the zones, therefore there is no additional information provided regarding this recommendation. All other items recommended have been incorporated into this staff report for your consideration. The May 14, 2025, GPC staff report and minutes are included as Exhibits 3 and 4.

DISCUSSION:

Existing law requires the State Fire Marshal (SFM) to identify areas of the state as Moderate, High, and Very High FHSZs based on the severity of fire hazard that is expected to prevail in those areas. The SFM shall provide these identified areas to local agencies for review and adoption. Moderate, High, and Very High FHSZs are classified by modeling software that determines the probability of hazard based on fire history, flame length, terrain, local weather, potential fuel over a 50-year period, urban vegetation cover, blowing embers, and fire hazards in nearby wildlands.

Existing law requires a local agency to designate, by ordinance, Very High FHSZs in its jurisdiction within 120 days of receiving recommendations from the SFM. A local agency may, at its discretion, include areas within the local agency's jurisdiction that are not identified by the SFM as Very High FHSZs following a finding supported by substantial evidence that the increased designation is necessary for effective fire protection within the area. Additionally, a local agency must designate, by ordinance, Moderate and High FHSZs within 120 days of receiving recommendations from the SFM. A local agency may, at its discretion, include areas within the jurisdiction of the local agency that are not identified by the SFM as Moderate and High FHSZ, respectively. However, a local agency is prohibited from decreasing the level of FHSZ as identified by the SFM for any area within the jurisdiction of the local agency.

State law does not allow for a local jurisdiction to request changes or provide comments to the SFM on the FHSZ designations. However, a local agency may choose to increase the designation of a FHSZ from the zone identified by the SFM, or designate areas as having a severity zone that were not designated by the SFM. This may occur because severity zone edges in the maps and data from the SFM are not aligned with parcel boundaries or roads that may be considered for lines of convenience when adopting ordinances.

As required, the SFM provided the Town with an updated map (Exhibit 3) of designated areas on February 24, 2025. Staff evaluated the map the SFM provided and created an updated map, including parcel and Town boundaries. This Los Gatos FHSZ Map is included with the Ordinance (Exhibit 1, Exhibit A) and Resolution (Exhibit 2, Exhibit A). Where parcels are split between two severity zones, the higher severity zone is assigned, pursuant to State law. This results in creating slight differences between the boundary lines that appear on the SFM FHSZ map and the Los Gatos FHSZ map. Staff are not recommending changes to the map provided by the SFM except those required to include complete parcels within a zone.

Property owners and/or occupants of structures located within the three designated FHSZs will be subject to additional fire safety requirements that do not apply in areas outside the FHSZs. Below is a non-exhaustive list of differences.

- New construction and additions will be required to meet specific home hardening requirements as outlined in the California Building Codes as adopted by the Town. These requirements will vary based on the nature of the project.
- New and existing structures will be required to maintain defensible space clearances, wildland fire safety practices, and vegetation management as outlined in Town Code Section 9.30.005.
- Owners of properties located within the High or Very High FHSZs will be required to make a natural hazard disclosure as part of a real estate transfer.
- New and existing structures within the High and Very High FHSZs will require a wider circle (100 feet) of defensible space clearance.
- Properties within the Very High FHSZ will be subject to the minimum standards of Public Resource Codes 4290 and 4291.

The FHSZ maps use hazard models that evaluate physical conditions that create a likelihood and expected fire behavior over a 50-year period without considering mitigation measures such as home hardening, recent wildfires, or fuel reduction efforts. Insurance companies use risk models that consider a structure's susceptibility to damage from fire and other factors that change more frequently and are not included in hazard modeling. Insurance risk models are unlikely to specifically call the State’s FHSZ maps as a factor. However, both model types would include some of the same data.

To comply with state law, the Town must approve the updated FHSZ map by ordinance before June 23, 2025.

PUBLIC COMMENTS:

Staff conducted outreach through the following media and social media resources, for public input:

- The Town's website home page, What's New;
- The Town's Facebook page;
- The Town's Twitter account;
- The Town's Instagram account; and
- The Town's NextDoor page.

Public comments received by 11:00 a.m., Friday, May 9, 2025, are included as Attachment 4.

CONCLUSION:

Based on the requirements of State law outlined above, staff recommends that the Planning Commission recommend approval to the Town Council regarding the adoption of an Ordinance (Exhibit 1) and Resolution (Exhibit 2) for the approval of an updated LRA FHSZs Map.

COORDINATION:

This report was prepared in coordination with Community Development, the Town Attorney's Office, and the Santa Clara County Fire Department.

ENVIRONMENTAL ASSESSMENT:

This project is exempt pursuant to CEQA, Section 15268 in that it is required by the State.

EXHIBITS:

1. Draft Ordinance, with Exhibit A, Los Gatos Fire Severity Zones Map
2. Draft Resolution, with Exhibit A, Los Gatos Fire Severity Zones Map
3. General Plan Committee Staff Report, May 14, 2025
4. General Plan Committee Draft Minutes, May 14, 2025
5. State Fire Marshal Fire Severity Zones Map
6. Los Gatos Fire Severity Map 2009
7. Los Gatos Fire Severity Map 2025
8. Public Comments Received by 11:00 a.m., Friday, May 23, 2025

DRAFT ORDINANCE

AN ORDINANCE OF THE TOWN COUNCIL OF THE TOWN OF LOS GATOS ADOPTING REVISED CAL FIRE REQUIREMENTS FOR LOCAL RESPONSIBILITY AREA FIRE HAZARD SEVERITY ZONES.

WHEREAS, the State's Government Code Section 51178 requires the local agency to designate moderate, high, and very high fire hazard severity zones in its jurisdiction within 120 of receiving recommendations from the State Fire Marshal; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the State Fire Marshal, as very high fire hazard severity zones following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as moderate and high fire hazard severity zones by the State Fire Marshal, as moderate and high fire hazard severity zones, respectively; and

WHEREAS, the local agency shall not decrease the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency, and, in exercising its discretion, may only increase the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency; and

WHEREAS, the local agency shall transmit a copy of an adopted ordinance to the State Board of Forestry and Fire Protection within 30 days of adoption.

NOW, THEREFORE, BE IT ORDAINED by the Town Council of the Town of Los Gatos as follows:

SECTION I.

The Local Responsibility Area Fire Hazard Severity Zones Map (Exhibit A) as designated by the Office of the State Fire Marshal is hereby adopted and designated as the map delineating fire hazard severity zones for the Town of Los Gatos.

SECTION II. Severability.

In the event that a court of competent jurisdiction holds any Section, subsection, paragraph, sentence, clause, or phrase in this Ordinance unconstitutional, preempted, or otherwise invalid, the invalid portion shall be severed from this Section and shall not affect the validity of the remaining portions of this Section. The Town hereby declares that it would have adopted each Section, subsection, paragraph, sentence, clause, or phrase in this Section

irrespective of the fact that any one or more Sections, subsections, paragraphs, sentences, clauses or phrases in this Section might be declared unconstitutional, preempted, or otherwise invalid.

SECTION III. CEQA.

Adoption of this ordinance is exempt pursuant to CEQA, Section 15268 in that it is required by the State.

SECTION IV. Publication.

In accordance with Section 63937 of the Government Code of the State of California, this Ordinance takes effect 30 days from the date of its passage. The Town Council hereby directs the Town Clerk to cause this Ordinance or a summary thereof to be published or posted in accordance with Section 36933 of the Government Code of the State of California.

SECTION V. Effective Date.

This Ordinance was introduced at a regular meeting of the Town Council of the Town of Los Gatos on the 3rd day of June 2025, and adopted by the Town Council of the Town of Los Gatos at its regular meeting on the 17th day of June 2025, by the following vote:

COUNCIL MEMBERS:

AYES:

NAYS:

ABSENT:

ABSTAIN:

SIGNED:

_____
MAYOR OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

ATTEST:

_____
TOWN CLERK OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

RESOLUTION 2025-__

RESOLUTION OF THE TOWN COUNCIL OF THE TOWN OF LOS GATOS ADOPTING A GENERAL PLAN AMENDMENT TO UPDATE FIRE SEVERITY ZONES IN ACCORDANCE WITH REVISED CAL FIRE REQUIREMENTS FOR LOCAL RESPONSIBILITY AREA FIRE HAZARD SEVERITY ZONES.

GENERAL PLAN AMENDMENT APPLICATION: GP-25-001

WHEREAS, the State's Government Code Section 51178 requires the local agency to designate moderate, high, and very high fire hazard severity zones in its jurisdiction within 120 of receiving recommendations from the State Fire Marshal; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the State Fire Marshal, as very high fire hazard severity zones following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as moderate and high fire hazard severity zones by the State Fire Marshal, as moderate and high fire hazard severity zones, respectively; and

WHEREAS, the local agency shall not decrease the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency, and, in exercising its discretion, may only increase the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency; and

WHEREAS, the local agency shall transmit a copy of an adopted ordinance to the State Board of Forestry and Fire Protection within 30 days of adoption.

NOW, THEREFORE, BE IT RESOLVED, that the Town Council of the Town of Los Gatos hereby approves an amendment of the General Plan, Hazards and Safety Element, to update the Fire Hazard Severity Zones Map (Exhibit A) as designated by the Office of the State Fire Marshal.

EXHIBIT 2

PASSED AND ADOPTED at a regular meeting of the Town Council of the Town of Los Gatos, California, held on the 3rd day of June 2025, by the following vote:

COUNCIL MEMBERS:

AYES:

NAYS:

ABSENT:

ABSTAIN:

SIGNED:

MAYOR OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

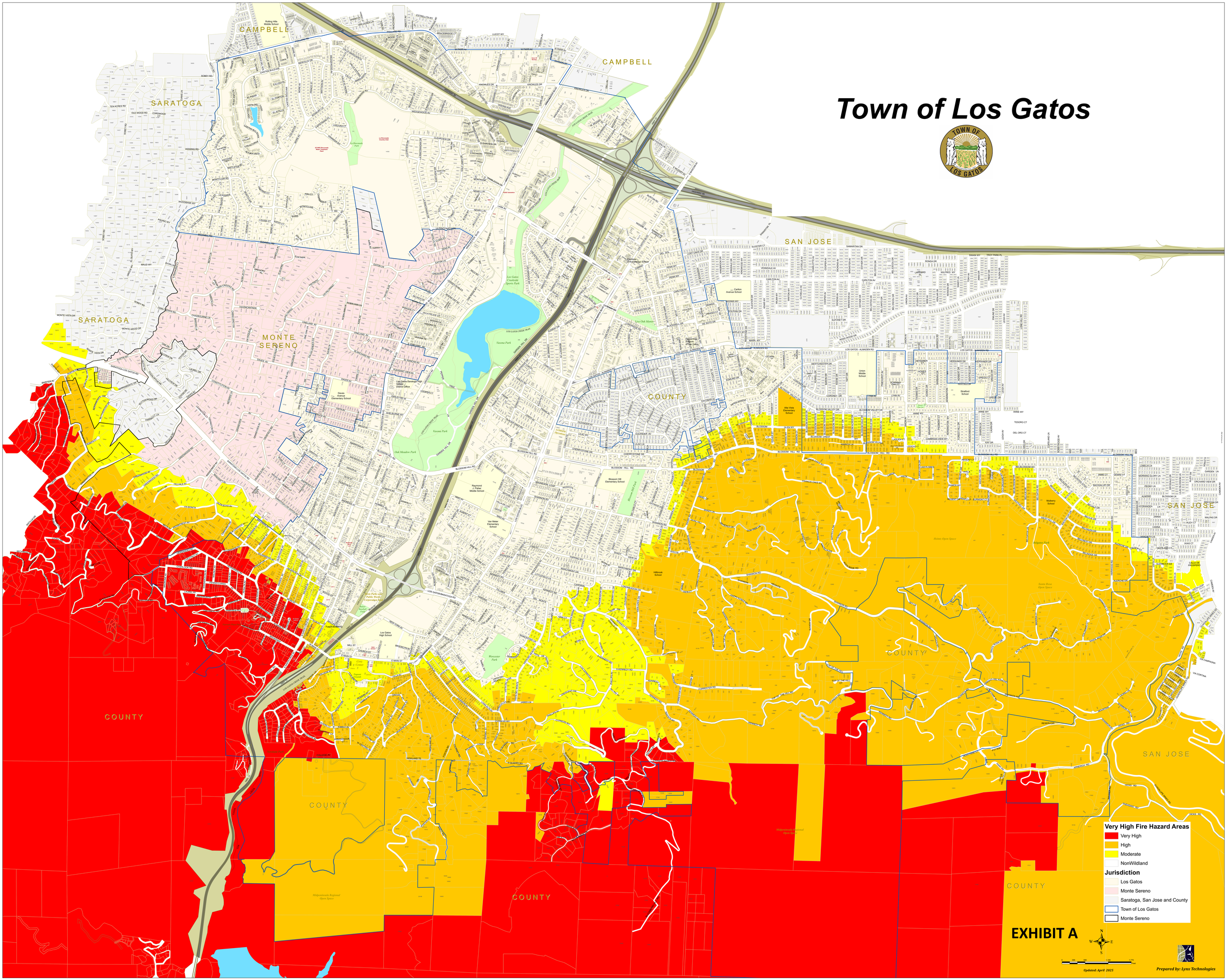
DATE: _____

ATTEST:

TOWN CLERK OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

DATE: _____

Town of Los Gatos



This Page
Intentionally
Left Blank

DATE: May 9, 2025

TO: General Plan Committee

FROM: Joel Paulson, Community Development Director

SUBJECT: Consider Making a Recommendation to the Planning Commission and Town Council to Approve the Fire Hazard Severity Zones Map Ordinance and Resolution which will be to Comply with State Government Code Section 51178 and an Amendment of the General Plan Hazards and Safety Element to Incorporate the Fire Hazard Severity Zones Map. Adoption of this Ordinance and Resolution is Exempt Pursuant to CEQA, Section 15268, in that it is Required by the State. General Plan Amendment Application GP-25-01 and Town Code Amendment A-25-03. **Project Location: Town Wide**. Applicant: Town Of Los Gatos.

RECOMMENDATION:

Consider making a recommendation to the Planning Commission and Town Council to approve the Fire Hazard Severity Zones Map Ordinance and Resolution which will be to comply with State Government Code Section 51178 and an amendment of the General Plan Hazards and Safety Element to incorporate the Fire Hazard Severity Zones Map. Adoption of this Ordinance and Resolution is exempt pursuant to CEQA, Section 15268, in that it is required by the State.

BACKGROUND:

Prompted by the devastating Oakland Hills Fire of 1991, State Legislation called for the California Department of Forestry and Fire Protection (Cal Fire) to evaluate fire hazard severity in Local Responsibility Areas (LRA) and recommend to the local jurisdictions where Very High Fire Hazard Severity Zones exist. Cal Fire used an extension of the State Responsibility Area (SRA) Fire Hazard Severity Zone model to evaluate fire hazard in the LRA, which reflects the flame and ember intrusion from adjacent wildlands and flammable vegetation in the urban area.

PREPARED BY: Robert Gray
Chief Building Official

Reviewed by: Community Development Director

On October 16, 2008, the Town of Los Gatos received Cal Fire's final draft Fire Hazard Severity Zone map, which the Town Council adopted on February 2, 2009. This map has not been updated since its adoption and is still in effect today.

DISCUSSION:

Existing law requires the State Fire Marshal (SFM) to identify areas of the state as moderate, high, and very high fire hazard severity zones based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors, including areas where winds have been identified by the SFM as a significant cause of wildfire spread. The SFM shall provide these identified areas to local agencies for review and adoption.

Existing law requires a local agency to designate, by ordinance, very high fire hazard severity zones in its jurisdiction within 120 days of receiving recommendations from the SFM. A local agency may, at its discretion, include areas within the jurisdiction of the local agency that are not identified as very high fire hazard severity zones by the SFM, as very high fire hazard severity zones following a finding supported by substantial evidence that the increased designation is necessary for effective fire protection within the area. Additionally, a local agency must designate, by ordinance, moderate and high fire hazard severity zones within 120 days of receiving recommendations from the SFM. A local agency may, at its discretion, include areas within the jurisdiction of the local agency that are not identified as moderate and high fire hazard severity zones by the SFM, as moderate and high fire hazard severity zones, respectively. However, a local agency is prohibited from decreasing the level of fire hazard severity zone as identified by the SFM for any area within the jurisdiction of the local agency.

State law does not allow for a local jurisdiction to request changes or provide comments to the SFM on the fire hazard severity zone designations. However, a local agency may choose to increase the designation of a fire hazard severity zone from the zone identified by the SFM, or designate areas as having a severity zone that were not designated in a severity zone by the SFM. This may occur because severity zone edges in the maps and data from the SFM are not aligned with parcel boundaries or roads that may be considered for lines of convenience when adopting ordinances.

As required, the SFM provided the Town with an updated map (Attachment 1) of designated areas on February 24, 2025. Staff evaluated the map the SFM provided and created an updated map, including parcel and Town boundaries. This Los Gatos Fire Severity Zones Map is included with the Ordinance (Attachment 2, Exhibit A) and Resolution (Attachment 3, Exhibit A). Where parcels are split between two severity zones, the higher severity zone is assigned, pursuant to State law. This results in creating slight differences between the boundary lines that appear on the SFM Fire Severity Zones Map and the Los Gatos Fire Severity Zones Map. Staff recommends no changes to the map provided by the SFM except those required to include complete parcels within a zone.

To comply with state law, the Town must act and designate the updated fire hazard severity zones map by ordinance before June 23, 2025.

PUBLIC COMMENTS:

Staff conducted outreach through the following media and social media resources, for public input:

- The Town's website home page, What's New;
- The Town's Facebook page;
- The Town's Twitter account;
- The Town's Instagram account; and
- The Town's NextDoor page.

Public comments received by 11:00 a.m., Friday, May 9, 2025, are included as Attachment 4.

CONCLUSION:

Based on the requirements of State Law outlined above, staff recommends that the General Plan Committee recommend approval to the Planning Commission and Town Council regarding the adoption of an Ordinance (Attachment 2) and Resolution (Attachment 3) for the approval of an updated Local Responsibility Area Fire Hazard Severity Zones Map.

COORDINATION:

This report was prepared in coordination with Community Development, the Town Attorney's Office, and the Santa Clara County Fire Department.

ENVIRONMENTAL ASSESSMENT:

This project is exempt pursuant to CEQA, Section 15268 in that it is required by the State.

Attachments:

1. State Fire Marshal Fire Severity Zones Map
2. Draft Ordinance, Exhibit A, Los Gatos Fire Severity Zones Map
3. Draft Resolution, Exhibit A, Los Gatos Fire Severity Zones Map
4. Public Comments Received by 11:00 a.m., Friday, May 9, 2025

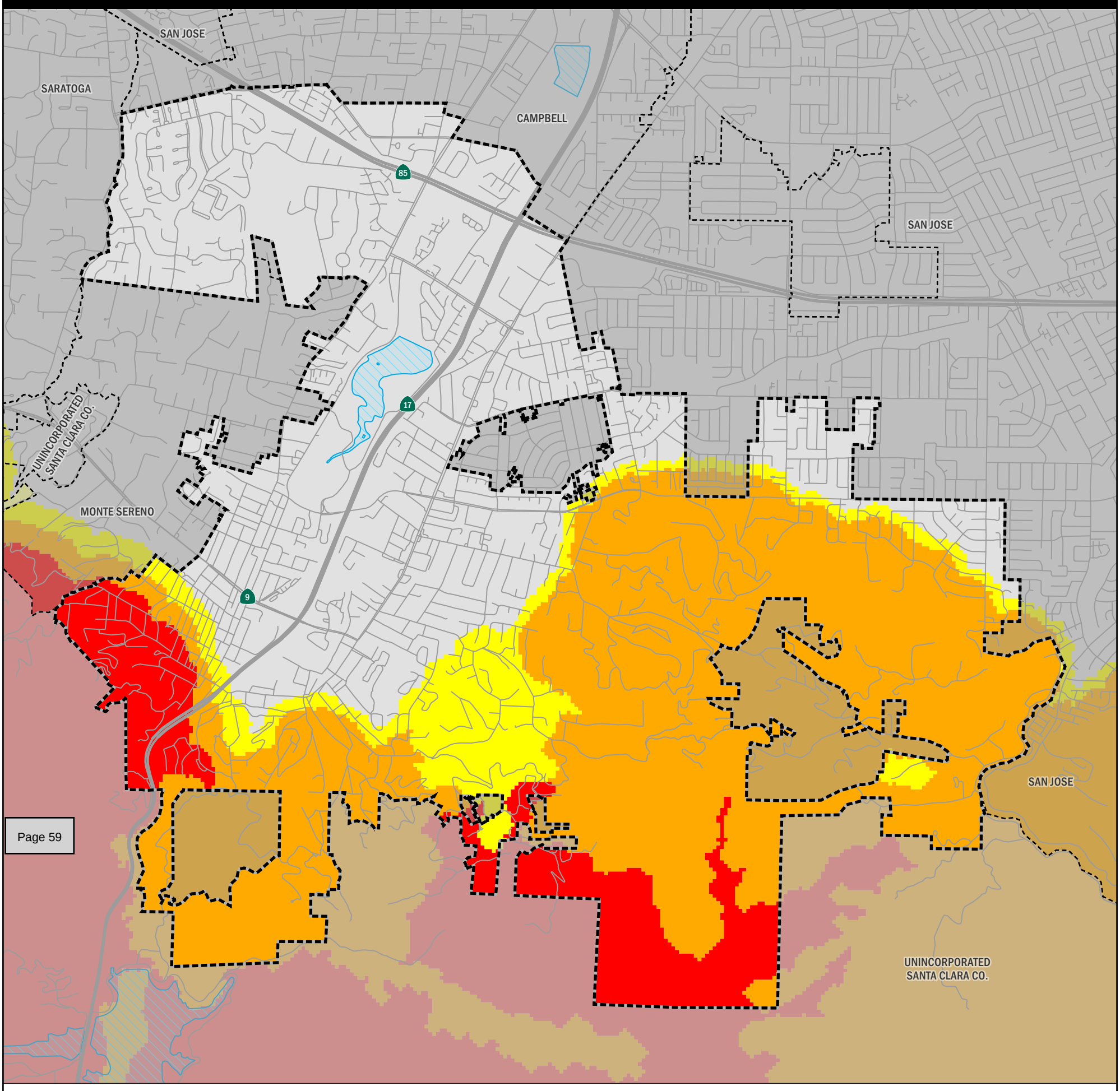
This Page
Intentionally
Left Blank

TOWN OF LOS GATOS – SANTA CLARA COUNTY

Local Responsibility Area Fire Hazard Severity Zones

As Identified by the State Fire Marshal

February 24, 2025



Fire Hazard Severity Zones (FHSZ) in Local Responsibility Area (LRA), as Identified by the State Fire Marshal

Very High | High | Moderate

Fire Hazard Severity Zones in State Responsibility Area (SRA), Effective April 1, 2024

Very High | High | Moderate

Mi 0 1
Km 0 1 2

Projection: NAD 83 California Teale Albers
Scale: 1:34,000 at 11" x 17"

Incorporated City | Waterbody

Unzoned LRA

Government Code section 51178 requires the State Fire Marshal to identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

The State of California and the Department of Forestry and Fire Protection make no representations or warranties regarding the accuracy of data or maps. Neither the State nor the Department shall be liable under any circumstances for any direct, special, incidental, or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of data or maps.

Gavin Newsom, Governor, State of California
Wade Crowfoot, Secretary for Natural Resources, CA Natural Resources Agency
Joe Tyler, Director/Fire Chief, CA Department of Forestry and Fire Protection
Daniel Berlant, State Fire Marshal, CA Department of Forestry and Fire Protection

Data Sources:
CAL FIRE Fire Hazard Severity Zones (FHSZSRA23_3, FHSZLRA_25_1)
CAL FIRE State Responsibility Areas (SRA25_1)
City and County boundaries as of 10/22/24 (CA Board of Equalization)

ATTACHMENT 1

This Page Intentionally Left Blank

DRAFT ORDINANCE

AN ORDINANCE OF THE TOWN COUNCIL OF THE TOWN OF LOS GATOS ADOPTING REVISED CAL FIRE REQUIREMENTS FOR LOCAL RESPONSIBILITY AREA FIRE HAZARD SEVERITY ZONES.

WHEREAS, the State's Government Code Section 51178 requires the local agency to designate moderate, high, and very high fire hazard severity zones in its jurisdiction within 120 of receiving recommendations from the State Fire Marshal; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the State Fire Marshal, as very high fire hazard severity zones following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as moderate and high fire hazard severity zones by the State Fire Marshal, as moderate and high fire hazard severity zones, respectively; and

WHEREAS, the local agency shall not decrease the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency, and, in exercising its discretion, may only increase the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency; and

WHEREAS, the local agency shall transmit a copy of an ordinance adopted to the State Board of Forestry and Fire Protection within 30 days of adoption.

NOW, THEREFORE, BE IT ORDAINED by the Town Council of the Town of Los Gatos as follows:

SECTION I.

The Local Responsibility Area Fire Hazard Severity Zones Map (Exhibit A) as designated by the Office of the State Fire Marshal is hereby adopted and designated as the map delineating fire hazard severity zones for the Town of Los Gatos.

SECTION II. Severability.

In the event that a court of competent jurisdiction holds any Section, subsection, paragraph, sentence, clause, or phrase in this Ordinance unconstitutional, preempted, or otherwise invalid, the invalid portion shall be severed from this Section and shall not affect the validity of the remaining portions of this Section. The Town hereby declares that it would have adopted each Section, subsection, paragraph, sentence, clause, or phrase in this Section

irrespective of the fact that any one or more Sections, subsections, paragraphs, sentences, clauses or phrases in this Section might be declared unconstitutional, preempted, or otherwise invalid.

SECTION III. CEQA.

Adoption of this ordinance is exempt pursuant to CEQA, Section 15268 in that it is required by the State.

SECTION IV. Publication.

In accordance with Section 63937 of the Government Code of the State of California, this Ordinance takes effect 30 days from the date of its passage. The Town Council hereby directs the Town Clerk to cause this Ordinance or a summary thereof to be published or posted in accordance with Section 36933 of the Government Code of the State of California.

SECTION V. Effective Date.

This Ordinance was introduced at a regular meeting of the Town Council of the Town of Los Gatos on the ___ day of _____ 2025, and adopted by the Town Council of the Town of Los Gatos at its regular meeting on the ____ day of _____ 2025, by the following vote:

COUNCIL MEMBERS:

AYES:

NAYS:

ABSENT:

ABSTAIN:

SIGNED:

_____
MAYOR OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

ATTEST:

_____
TOWN CLERK OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

RESOLUTION 2025-__

**RESOLUTION OF THE TOWN COUNCIL
OF THE TOWN OF LOS GATOS
ADOPTING A GENERAL PLAN AMENDMENT TO UPDATE FIRE SEVERITY ZONES IN ACCORDANCE WITH REVISED CAL FIRE REQUIREMENTS FOR LOCAL RESPONSIBILITY AREA FIRE HAZARD SEVERITY ZONES.**

GENERAL PLAN AMENDMENT APPLICATION: GP-25-001

WHEREAS, the State's Government Code Section 51178 requires the local agency to designate moderate, high, and very high fire hazard severity zones in its jurisdiction within 120 of receiving recommendations from the State Fire Marshal; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as very high fire hazard severity zones by the State Fire Marshal, as very high fire hazard severity zones following a finding supported by substantial evidence in the record that the requirements of Section 51182 are necessary for effective fire protection within the area; and

WHEREAS, the local agency may, at its discretion, include areas within the jurisdiction of the local agency, not identified as moderate and high fire hazard severity zones by the State Fire Marshal, as moderate and high fire hazard severity zones, respectively; and

WHEREAS, the local agency shall not decrease the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency, and, in exercising its discretion, may only increase the level of fire hazard severity zone as identified by the State Fire Marshal for any area within the jurisdiction of the local agency; and

WHEREAS, the local agency shall transmit a copy of an ordinance adopted to the State Board of Forestry and Fire Protection within 30 days of adoption.

NOW, THEREFORE, BE IT RESOLVED, that the Town Council of the Town of Los Gatos hereby approves an amendment of the General Plan, Hazards and Safety Element to update the Fire Hazard Severity Zones Map (Exhibit A) as designated by the Office of the State Fire Marshal.

PASSED AND ADOPTED at a regular meeting of the Town Council of the Town of Los Gatos, California, held on the XXth day of June 2025, by the following vote:

COUNCIL MEMBERS:

AYES:

NAYS:

ABSENT:

ABSTAIN:

SIGNED:

MAYOR OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

DATE: _____

ATTEST:

TOWN CLERK OF THE TOWN OF LOS GATOS
LOS GATOS, CALIFORNIA

DATE: _____

From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Monday, March 17, 2025 11:31 AM
To: Planning <Planning@losgatosca.gov>
Subject: Online Form Submission #15701 for Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at...

[EXTERNAL SENDER]

Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at this time, but will be collected and considered during the implementation process.

First Name	John
Last Name	Cleveland
Email Address (Required)	[redacted]
Phone Number	[redacted]
Message (Required)	There needs to be a balance between maintaining properties for fire safety and we need clear simple inexpensive/no cost services/solutions and the cost of insurance.
Add An Attachment if applicable	*Field not completed.*

Email not displaying correctly? View it in your browser.

From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Friday, April 11, 2025 4:38 PM
To: Planning <Planning@losgatosca.gov>
Subject: Online Form Submission #15808 for Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at...

[EXTERNAL SENDER]

Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at this time, but will be collected and considered during the implementation process.

First Name	William
Last Name	Weiner
Email Address (Required)	[redacted]
Phone Number	[redacted]
Message (Required)	Fairview plaza water service including fncluding fire hydrants test yearly at UNDER 30 lbs.Fairview ave has water pressure above 80lbs. Residents have been asking SJC water co to remedy this deficiency for more than 25 years. How will the town stop a fire if and when with so little pressure. This is why the Pacific Palisades was completely lost.the city of San Jose is not enforcing the water service equally to all. I will appreciate how this will be remedied?
Add An Attachment if applicable	*Field not completed.*

Email not displaying correctly? View it in your browser.

From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Saturday, April 26, 2025 4:31 PM
To: Planning <Planning@losgatosca.gov>
Subject: Online Form Submission #15847 for Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at...

[EXTERNAL SENDER]

Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at this time, but will be collected and considered during the implementation process.

First Name	Jeff
Last Name	Siegel
Email Address (Required)	[redacted]
Phone Number	*Field not completed.*
Message (Required)	Given the strong winds and even stronger gusts that blow through the glenridge neighborhood during the peak fire season, the state, the town of Los Gatos needs to take a far more serious approach than in the past, and Marin is a good model, where fire safety is front and center. Given the close proximity of homes in the historic sections of town, particularly where those homes fall into the high or extremely high severity zones, it is insufficient to focus only on vegetation mgmt. In many cases, wood fences are within just a few out or two of homes, providing the fuel ladder that allows flames to get under the eaves of homes. The town should create an ordinance that allows only deer fencing when fencing is dangerously close to adjoining homes. Likewise, there are certain types of plants, that Marin County and CalFire have identified, such as juniper trees, that are extremely flammable, nicknamed roman candles by Marin Fire. These are frequently found on property perimeters dangerously close to neighboring homes in historic residential areas. Santa Clara Fire is a laggard, not a leader, and the town needs to use Marin as the model to more proactively get ahead in order to mitigate the dangers before it's too late.

Add An Attachment if applicable	*Field not completed.*

Email not displaying correctly? View it in your browser.

From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Tuesday, April 29, 2025 12:03 PM
To: Planning <Planning@losgatosca.gov>
Subject: Online Form Submission #15856 for Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at...

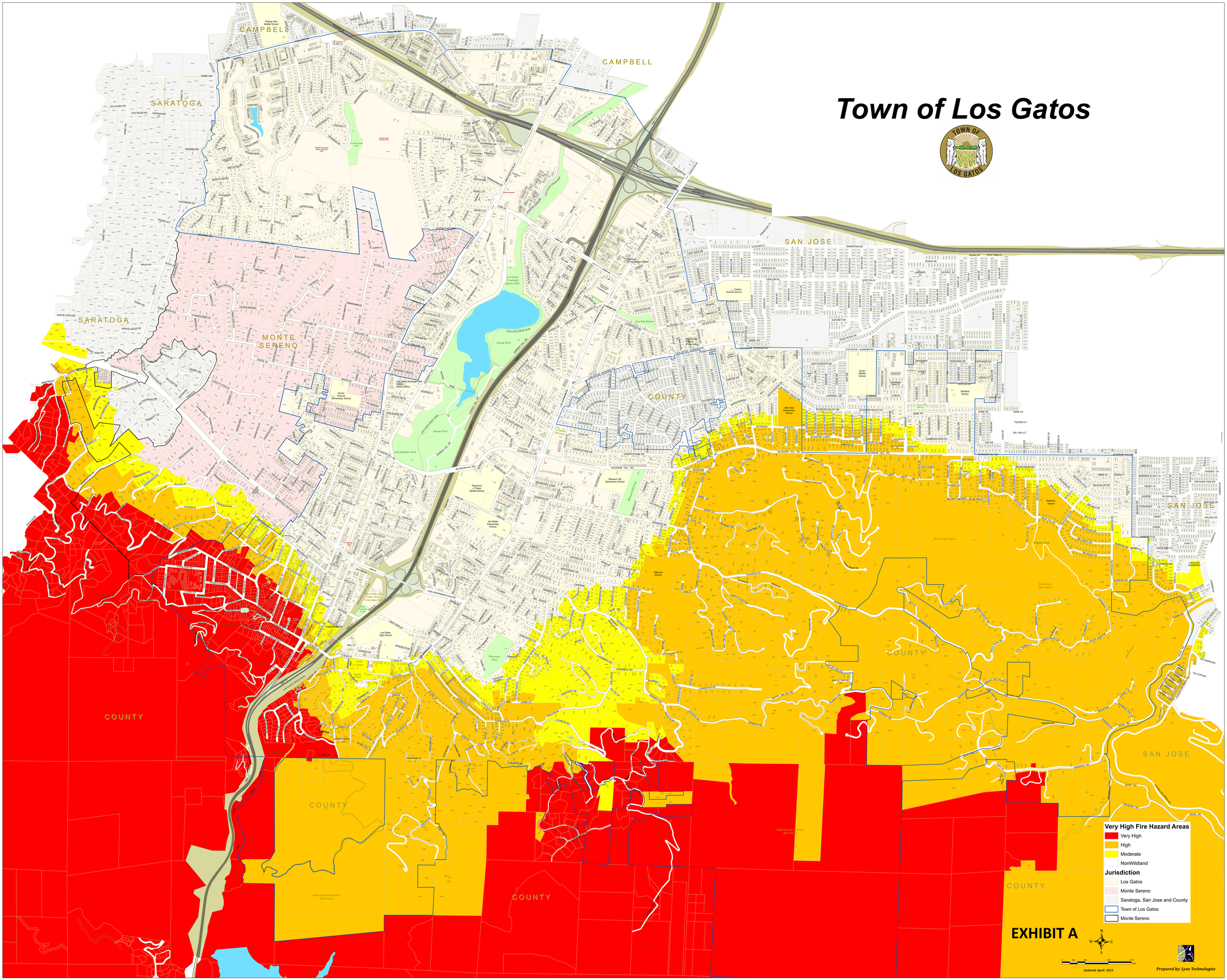
[EXTERNAL SENDER]

Local Responsibility Fire Hazard Severity Zone Comment Form: Please provide your public comments regarding the Office of State Fire Marshall revised fire hazard severity map. Public comments will not be responded to at this time, but will be collected and considered during the implementation process.

First Name	alan
Last Name	young
Email Address (Required)	[redacted]
Phone Number	[redacted]
Message (Required)	I looked up my fire hazzard ratting and it was mild on one rating but high on another My next door neighbor did a lot split and built a second house and his ratting is low the lot is up hill from Foster road 17 feet wide but stream right next to it I can trim off all vigitation.
Add An Attachment if applicable	*Field not completed.*

Email not displaying correctly? View it in your browser.

Town of Los Gatos



This Page
Intentionally
Left Blank

DRAFT
MINUTES OF THE GENERAL PLAN COMMITTEE MEETING
MAY 14, 2025

The General Plan Committee of the Town of Los Gatos conducted a meeting on May 14, 2025, at 5:30 p.m.

MEETING CALLED TO ORDER AT 5:30 P.M.

ROLL CALL

Present: Chair Ryan Rosenberg, Vice Chair Emily Thomas, Council Member Maria Ristow, Commissioner Jeffrey Barnett, Commissioner Rob Stump, Committee Member Bent Jensen, and Committee Member Rasha Lashin.

Absent: Council Member Rob Rennie, Committee Member Chris Ray.

VERBAL COMMUNICATIONS

None.

CONSENT ITEMS (TO BE ACTED UPON BY A SINGLE MOTION)

1. Approval of Meeting Minutes of February 12, 2025.

MOTION: **Motion** by **Council Member Ristow** to Approve Consent Item. **Seconded** by **Commissioner Barnett**.

VOTE: **Motion passes (5-0-2)**, with Committee Members Jensen and Lashin abstaining.

PUBLIC HEARINGS

2. Consider Making a Recommendation to the Planning Commission to Approve the Fire Hazard Severity Zones Map Resolution and Ordinance to Comply with State Government Code Section 51178 and Amend the General Plan to Incorporate the Fire Hazard Severity Zones. Adoption of this Resolution and Ordinance is Exempt Pursuant to CEQA, Section 15268, in that it is Required by the State. General Plan Amendment Application GP-25-01 and Town Code Amendment A-25-03. Project Location: Town Wide. Applicant: Town of Los Gatos.

Robert Gray, Chief Building Official, presented the staff report.

Committee Members asked Staff questions.

Robert Gray

In general, the map hasn't changed significantly. We plan to have a comparative map for future meetings for viewing.

Joel Paulson

Currently, with the General Plan, we are requesting to replace the old FHSZ map with this new one as required by the State.

Opened Public Comment.

Carin Yamamoto

Is this map based on the conditions, or environment right now in Los Gatos, or is it a general map based on year-round changes?

Chair Rosenberg

We don't typically answer questions during public comments, but will ask staff to respond as it is a good question.

Robert Gray

The new map is made up of 29 years' worth of fire history and growth data. It is also set up based on the worst-case scenario. It considers the driest conditions and overgrowth in areas.

Brad Fox, Santa Clara County Fire

In addition to what Robert said, one of the major changes in the modeling from 2008 to the current modeling is in 2008, the state utilized a state database for weather conditions, whereas today, we are using remote automatic weather stations. That was a driver of the differences being proposed.

Closed Public Comment.

Committee Members discussed the matter.

Robert Gray

The original map showed everything as very high fire danger. The changes shown on the revised map have the Town broken up into three zones now: moderate; high; and very high severity zones.

Robert Gray

This year is a Code adoption year. This map adoption will coincide with Code changes to be proposed this year.

Robert Gray

This revised map is a more granular view of the hazards, and no changes are happening around zoning of the town.

Joel Paulson

We can work with County Fire to see if CalFire already has descriptions for the zones to be available to incorporate online and within the General Plan. CalFire has stated that insurance companies do not take this map into consideration as they have their own parameters to work with around insurance for homes in fire zones.

MOTION: **Motion** by **Commissioner Stump** to recommend approval of the Fire Hazard Severity Zones Map Ordinance and Resolution. **Seconded** by **Council Member Ristow**.

VOTE: **Motion passes unanimously.**

OTHER BUSINESS

3. Consider Whether the Town Should Retain a Separate General Plan Committee and Provide a Recommendation to the Town Council.

Ryan Rosenberg provided an explanation as to why he asked for this item to be brought before the Committee.

Ryan Rosenberg stated that there are no members of the public present.

Committee Members discussed the matter.

Maria Ristow

When we think about the Housing Element Advisory Board, we created this to ensure the residents were involved due to other jurisdictions getting backlash when the Planning Commission did it. It's important to have an ad hoc committee to help discuss, offer advice, and allow for additional engagement of the public.

Ryan Rosenberg

There is value in having a dedicated group when it comes to major changes to the General Plan.

Rob Stump

Having only eight meetings in a four-year period speaks for itself. How involved are you as a volunteer if we rarely meet? It might be more valuable to sit on another committee that meets regularly.

Emily Thomas

It is important to state that this body met 30 times during the four-year period, but we were not considered the GPC. We were listed as the GPAC and HEAB. The data provided doesn't fully tell the story. If we decide to dissolve this Committee, that doesn't mean that GPAC or HEAB won't occur, but the GPC is the key group of those ad hoc committees. The concern is what is on the horizon in terms of General Plan amendments to come soon, specifically the Land Use Element.

Maria Ristow

Did we retain the General Plan Advisory Committee, or has that been dissolved?

Gabrielle Whelan

Yes it was dissolved.

Maria Ristow

Is there a mechanism that this body remains as a group and be notified when these larger amendments are coming and come together to facilitate the meetings, or is dissolving just that? And we have to start from scratch?

Gabrielle Whelan

You can recommend, to Council, an amendment to the resolution around committee duties to only involve the Land Use or Community Design Element, or to meet as needed, or quarterly.

Joel Paulson

When the Council created the GPAC or HEAB, they added additional members outside of the General Plan Committee. It is typically four additional members.

Ryan Rosenberg

We have three citizens on the committee, whereas the other members are Council and Planning Commissioners. We, as community members, want to provide insight and support, so if there are topics that need this Committee, I would be happy to do it, but as it stands right now, a 21-minute meeting isn't worth the overhead of staff time to facilitate this meeting.

Emily Thomas

Could we make some sort of recommendation to Council around it being at Staff's discretion that an item come before the GPC versus Planning Commission. It might be helpful for staff to have an item go to GPC before it goes to Planning Commission, then to Council.

Joel Paulson

The reality of it all is that we have to change the duties, so it won't be as simple to make the changes because we can't really pick and choose what those duties should be. We would have to have a strict definition.

Ryan Rosenberg

A recommendation to the Council could be to change the purpose of this group to be the group who reviews the fundamental changes of the Land Use within the next six months, otherwise the Committee should dissolve.

Jeffrey Barnett

Is there a benefit to having the General Plan Advisory Committee?

Joel Paulson

We have a group of nine members, of which three of you are from Planning Commission, and two are from the Council. We would recruit four members of the public. In the scenario of dissolving, we would be recruiting eight.

Ryan Rosenberg

With the GPAC dissolved already, it would be like starting from scratch anyway. There should be a time limit because it shouldn't take a year or two years to meet. The Council should be able to determine when the ad hoc committee is needed.

Rasha Lashin

As the newest member, I applied and interviewed twice because I wanted to be part of the Committee. But if this really isn't going to drive the outcomes we are looking for, and it's not going to get us where we want us to be, then I am fine with dissolving.

Ryan Rosenberg

The Council, with staff support, can discuss what modifications to this body could be to have more specific duties.

Joel Paulson

We will bring this discussion before the Council to get direction on how to proceed. We can offer suggestions about dissolving the Committee, modifying the duties to be major changes versus minor changes, which could go to the Planning Commission, or modifying the meeting schedule.

Emily Thomas

Whatever direction allows for less staff time for what tends to be a 20-minute meeting is what I am for.

Ryan Rosenberg

I don't know if I like being on a committee that never meets. It looks bad being on an inactive committee when I want to do work supporting the community.

Maria Ristow

Unless we know we have a large project coming up, it's not worth keeping this Committee together. I just want to be sure we encourage our community members to be encouraged to still apply for new committees. On top of staff time, the cost of noticing is a factor.

Jeffrey Barnett

I agree with all the arguments made tonight. I believe the Council can make an ad hoc committee whenever needed, so I am ready to move forward with a motion.

MOTION: **Motion** by **Commissioner Barnett** to forward a recommendation to the Town Council to dissolve the General Plan Committee, but to continue utilizing ad hoc committees that are comprised of members of the Planning Commission, Council, and public representatives. **Seconded** by **Commissioner Thomas**.

VOTE: **Motion passed unanimously.**

ADJOURNMENT

The meeting adjourned at 6:41 p.m.

This is to certify that the foregoing is a true and correct copy of the minutes of the May 14, 2025, meeting as approved by the General Plan Update Advisory Committee.

_____

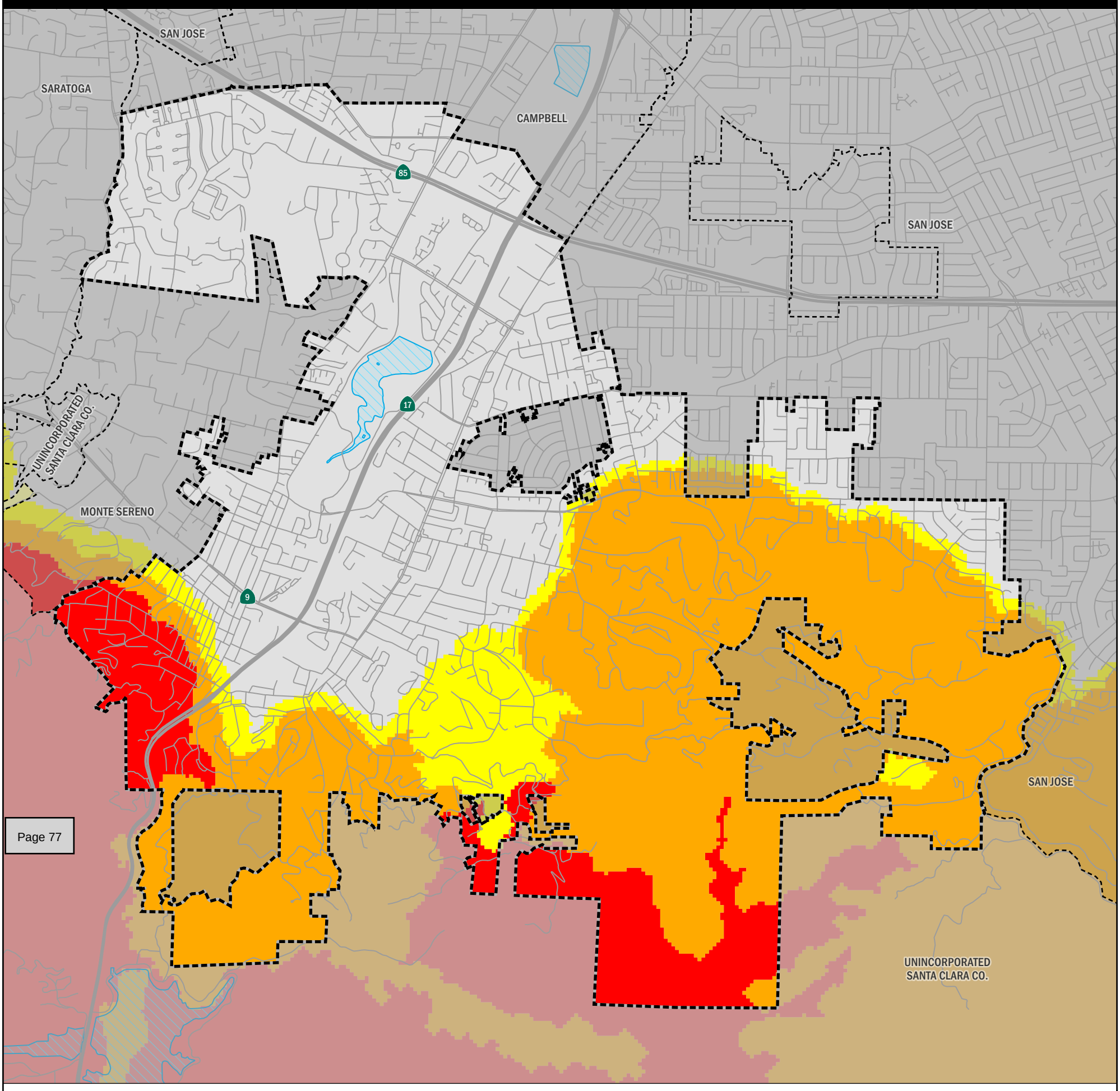
Joel Paulson, Director of Community Development

TOWN OF LOS GATOS – SANTA CLARA COUNTY

Local Responsibility Area Fire Hazard Severity Zones

As Identified by the State Fire Marshal

February 24, 2025



Fire Hazard Severity Zones (FHSZ) in Local Responsibility Area (LRA), as Identified by the State Fire Marshal

Very High | High | Moderate

Fire Hazard Severity Zones in State Responsibility Area (SRA), Effective April 1, 2024

Very High | High | Moderate

Mi 0 1

Km 0 1 2

Projection: NAD 83 California Teale Albers
Scale: 1:34,000 at 11" x 17"

Incorporated City | Waterbody

Unzoned LRA

Government Code section 51178 requires the State Fire Marshal to identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

The State of California and the Department of Forestry and Fire Protection make no representations or warranties regarding the accuracy of data or maps. Neither the State nor the Department shall be liable under any circumstances for any direct, special, incidental, or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of data or maps.

Gavin Newsom, Governor, State of California

Wade Crowfoot, Secretary for Natural Resources, CA Natural Resources Agency

Joe Tyler, Director/Fire Chief, CA Department of Forestry and Fire Protection

Daniel Berlant, State Fire Marshal, CA Department of Forestry and Fire Protection

Data Sources:

CAL FIRE Fire Hazard Severity Zones (FHSZSRA23_3, FHSZLRA_25_1)

CAL FIRE State Responsibility Areas (SRA25_1)

City and County boundaries as of 10/22/24 (CA Board of Equalization)

EXHIBIT 5

This Page Intentionally Left Blank

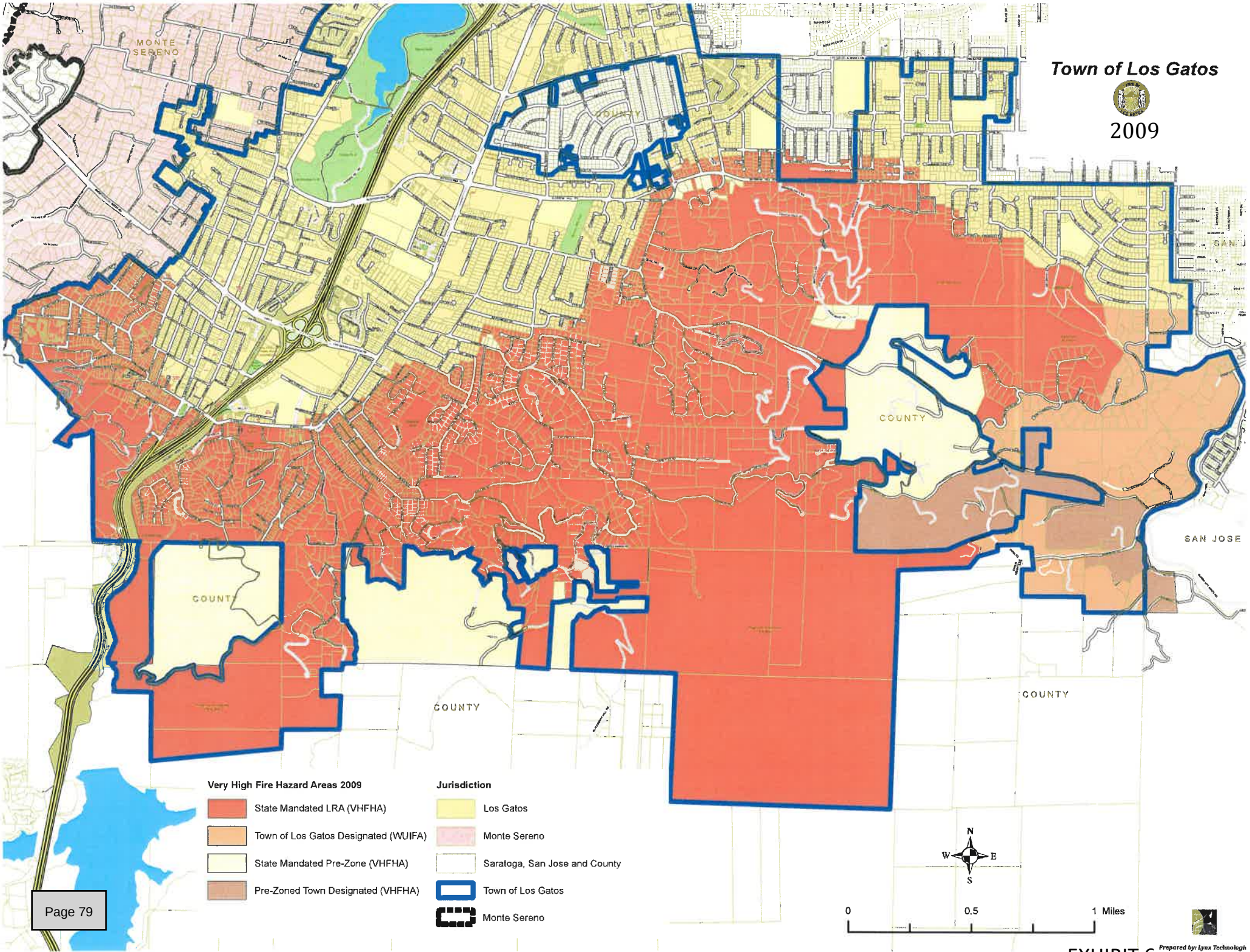
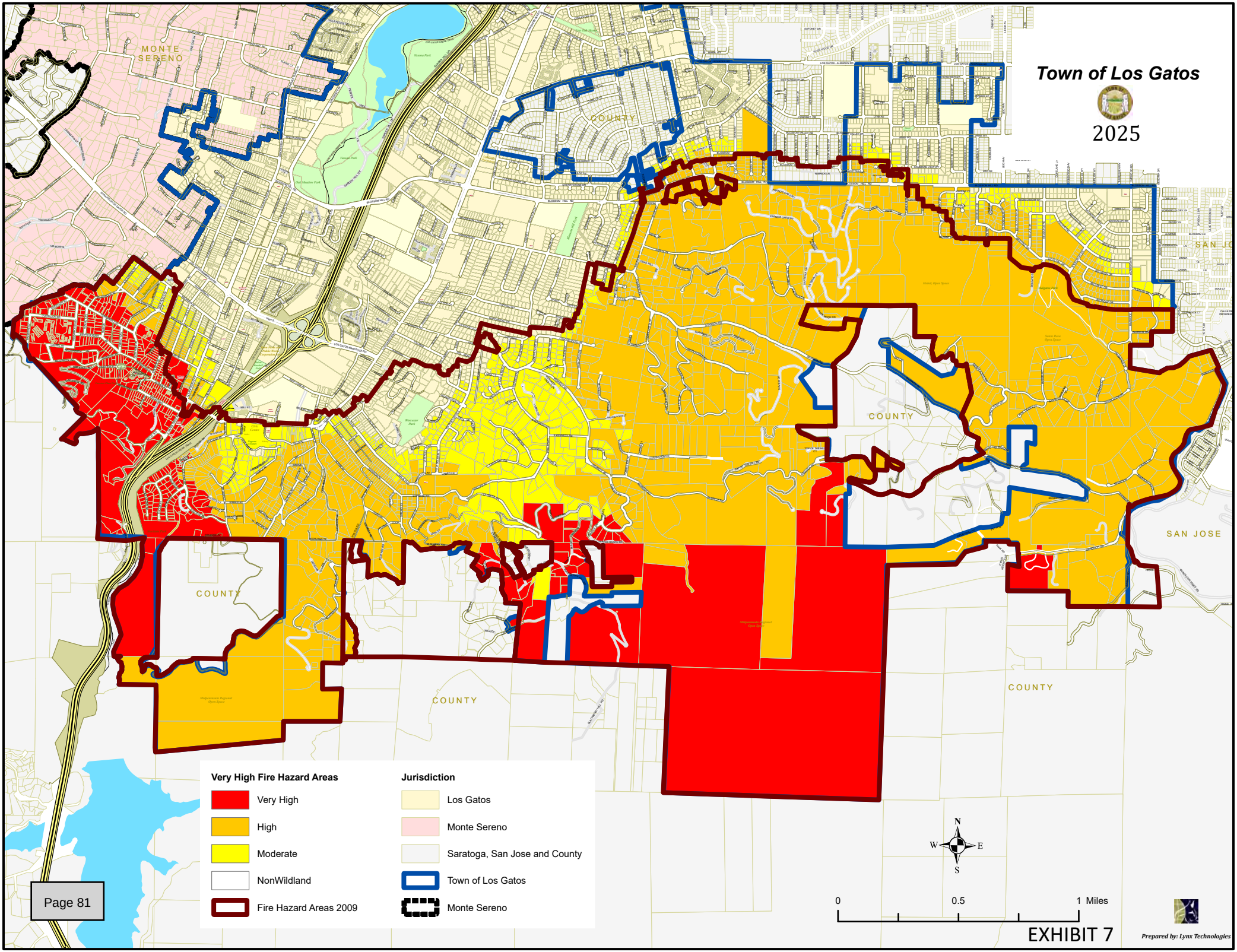

Town of Los Gatos
2009
MONTE SERENO
COUNTY
SAN JOSE
Very High Fire Hazard Areas 2009
State Mandated LRA (VHFHA)
Town of Los Gatos Designated (WUIFA)
State Mandated Pre-Zone (VHFHA)
Pre-Zoned Town Designated (VHFHA)
Jurisdiction
Los Gatos
Monte Sereno
Saratoga, San Jose and County
Town of Los Gatos
Monte Sereno
N
W
E
S
0
0.5
1 Miles
Prepared by: Lynx Technologh

EXHIBIT 6

This Page
Intentionally
Left Blank


Town of Los Gatos
2025
MONTE SERENO
COUNTY
SAN JOSE
Very High Fire Hazard Areas
Very High
High
Moderate
NonWildland
Fire Hazard Areas 2009
Jurisdiction
Los Gatos
Monte Sereno
Saratoga, San Jose and County
Town of Los Gatos
Monte Sereno
N
W
E
S
0
0.5
1 Miles
EXHIBIT 7
Prepared by: Lynx Technologies

This Page
Intentionally
Left Blank

From: Brent Ventura [redacted]
Sent: Monday, May 19, 2025 2:57 PM
To: Council <Council@losgatosca.gov>
Subject: Attached Letter on need for Town to Consider adopting New Fire Building Code for projects exceeding 35; and 55'

[EXTERNAL SENDER]
Different code requirements depending upon building height and proximity to wildfire severity zone as determined by CalFire earlier this year.

--
Law Offices of BRENT N. VENTURA
[redacted]

[CONFIDENTIALITY NOTICE: THIS E-MAIL IS INTENDED ONLY FOR THE USE OF THE PERSON TO WHOM IT IS ADDRESSED. IT MAY CONTAIN INFORMATION THAT IS CONFIDENTIAL, PRIVILEGED OR EXEMPT FROM DISCLOSURE. ANY UNAUTHORIZED DISCLOSURE OR DISSEMINATION OF THIS E-MAIL IS PROHIBITED. IF YOU HAVE RECEIVED THIS E-MAIL IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY RETURN E-MAIL OR PHONE.]

LAW OFFICES OF
BRENT N. VENTURA
Inactive
[redacted]

May 13, 2025

Mayor Matthew Hudes and
Honorable Town Council Members
Town of Los Gatos
110 E. Main St.
Los Gatos, CA 95030

Re: Every SB 330 Builders Remedy Projects Currently Pending Approval in Los Gatos:

101 S Santa Cruz Ave.
14288 Capri Dr.
15300- 15330 Los Gatos Blvd.
14849 Los Gatos Blvd.
5459-16392 Los Gatos Blvd
15349-15367 Los Gatos Blvd
15171 Los Gatos Blvd

14917-14925 Los Gatos Blvd
101 Blossom Hill Rd.
16492 Los Gatos Blvd.
143-151 E. Main St.
16250-16270 Burton Road
980 University Ave.
101 S. Santa Cruz Ave.
178 Twin Oaks Rd.
14789 Oka Rd.

Dear Mayor Hudes and Honorable Council Members,

Since the filing period for SB 330 projects has expired and the review process has first of which was two urban wildfires in the Los Angeles metropolitan area that manifested current fire codes and standards that identified inadequacies for emergency responders to save life and property. Firefighting resources proved woefully inadequate and the urban/municipal water supply was exhausted briefly after the conflagration commenced.The extreme risk of wildfire spreading in wildfire risk zones can be seen in the rapid spread of wildfire in the urbanized and densely populated areas that occurred in quarter-mile leaps by windblown embers.These areas, once thought completely safe from the threat, helped with the

consideration of community development by illustrating entirely new threats to health and safety issues.

The second critical change after 1/1/25 that occurred was when CALFIRE finalized its zone maps, identifying Los Gatos zones to be at severe wildfire risk. As you are well aware, the land area of Los Gatos indicated to be at risk for severe wildfire has greatly increased from what previous analysis had predicted. There are some SB 330 projects proposed that are either within, adjacent to, or within a half mile of a severe wildfire risk zone. The idea of greatly intensifying residential densities in areas identified as subject to severe wildfire risk is objective grounds to question the health and safety of proceeding with these projects. commenced, there have been two critically significant changes to the health and safety and the sustainability of residential habitation in identified portions of Los Gatos. Both of these critically significant public health and safety changes occurred after January 1, 2025.

Whether these facts alone give the Town valid legal grounds to deny these projects is an open legal question, but it does seem prudent for the Town to make inquiry and require the State and/or HCD to issue clear guidance to jurisdictions reviewing these projects. It must be brought into question and consideration whether public health and safety is protected and satisfied by allowing the construction of high density residential towers immediately adjacent to or within a half mile of severe wildfire risk zones.

If the State mandates these projects despite the patent and severe risks, then the Town should be indemnified from liability at least. The State should immunize jurisdictions for compelling them to approve high-density residential projects under SB 330 when doing so clearly raises very significant health and safety risks to both current and future residents of the community.

Regardless, Los Gatos as an independent government entity in California can proceed independently, without any prior authorization, to act on an Emergency basis and immediately protect the health and safety of its current residents by enacting a new Fire Building Code.

My legal research indicates that the Town, as its own independent legal government entity in California, has the right to enact and adopt its own specific Fire Building Codes that reflect the specific risks- geography, climate, and topography- of our jurisdiction. Los Gatos is not obligated to adopt and implement any national or Statewide Fire Code. The Town has the legal authority to draft, adopt, and implement its own Fire Code reflecting the very specific firefighting risks facing a hillside community with 3 different severe wildfire risk zones within its borders.

The Town is currently endangering the health and safety of its citizens, to whom they have a sworn duty to protect, by delegating the Building Fire Permit authority to a Central Fire Clerk working with an outdated Fire Code that was drafted and implemented without absolutely any consideration of the health and safety issues pertaining to:

- The severe wildfire risk zones coming down from the hillsides directly into Downtown Los Gatos;

- The LA wildfires that showed the urban water supply system failure, leaving firefighters without sufficient water pressure and adequate water supply to fight the wildfire;

-The emergency evacuation Notice failure and first responders being unsuccessful in evacuating the region exposed to fire, thus resulting in extremely high deaths and injuries;

- That the Los Angeles conflagration spread, burning areas up to a half a mile away that were uninvolved in the initial firestorm by windblown burning embers, which firefighters had no ability to contain;

- That building very high density high rise residential towers within, adjacent to, or within a half mile of severe wildfire risk zones presents an imminent, clear and present danger to public health and safety.

Los Gatos needs to immediately adopt a new Fire Building Code that incorporates and mitigates the harsh realities and lessons from the tragic LA wildfires. It must also account for the large area of the community identified to be located within a severe wildfire risk zone.

If Los Gatos does not act independently and immediately, it will take years for the administrative process to collaborate and develop a new statewide Firefighting Building Code to incorporate the recent lessons learned. Los Gatos needs to immediately take the leash of this beast on an emergency basis. In light of the imminent, clear, and present threat to public health and safety, Los Gatos should adopt a new Fire Building Code that all new construction projects in Los Gatos must satisfy in order to obtain necessary permits before any construction can commence.

From my review of some of the revised development plans submitted for some of the taller projects that are 6-13 story towers, they indicate that the supply of water is only to that tower's fire suppression needs and will significantly lower the water pressure available to the surrounding neighborhood. The plans also indicate the specifics on their Fire Suppression Plans will be "deferred" until the time of submission of the permits. This appears to be an obfuscation and is misleading the Town and Central Fire of the wildfire and firefighting risks addressed in this correspondence.

There is no need or requirement under state law that existing homeowners and neighborhoods should have their emergency water pressure reduced in order to facilitate these SB 330 projects. In fact, the underlying guidance in SB 330 is that these projects should proceed only where consistent with insuring the general health and safety of current residents.

While these residential towers, with their sprinkler fire suppression systems and metal facades may be less prone to wildfire risks, they compromise the water pressure and water supply available for firefighters to suppress fire in the surrounding neighborhoods.

I urge the Town Council to immediately address this issue. From my limited research and without any specific expertise, I can advise that the following measures must be incorporated into Los Gatos' new Fire Building Code:

• Every new construction over 35' in height, located within a half mile of any severe risk wildfire zone must have an independent water supply system on site. Its fire suppression system must be independent of the existing urban water system and will not affect either the available water supply or water pressure to any of the surrounding area. Such on-site water supply system shall include dual gravity fed tanks and dual mechanically supplied water for its internal firefighting needs sufficient to suppress fire for 2 hours.

• Every new construction over 55' in height, more than a half mile away from any severe wildfire risk zone must have an independent water supply system on site, such that its fire suppression system is independent of the existing urban water system and will not affect either the available water supply or water pressure to any of the surrounding area. Such on site water supply system shall include dual gravity fed tanks and dual mechanically supplied water for its internal firefighting needs sufficient to suppress fire for 2 hours.

Thank you for your courteous consideration of this matter.

Respectfully submitted,

BRENT N. VENTURA

BNV/bt

4

This Page
Intentionally
Left Blank