



Building Code Board of Appeals

August 28, 2024
Packet Addendum #1

Links to City Council 7/30/2024

A. Please review City Council Meeting from July 30, 2024 regarding support for the Home Hardening Code

a. Link to City Council Packet from 7-30-24:

<https://www.louisvilleco.gov/home/showpublisheddocument/42673/638576013877200000>

b. Link to Video from City Council Meeting from 7-30-24 <https://youtu.be/gtg-ilh1MRU>

Persons planning to attend the meeting who need sign language interpretation, translation services, assisted listening systems, Braille, taped material, or special transportation, should contact the City Clerk's Office at 303 335-4536 or MeredythM@LouisvilleCO.gov. A forty-eight-hour notice is requested.

Si requiere una copia en español de esta publicación o necesita un intérprete durante la reunión, por favor llame a la Ciudad al 303.335.4536 o 303.335.4574.

From: Maria McClure <mmclure2010@gmail.com>
Sent: Saturday, August 24, 2024 5:56 PM
To: Building Safety; City Council
Subject: Home hardening code

To the Building Code Board of Appeals,

I am writing to support the adoption of the Louisville Hardening Code. This code will ensure upcoming and future construction in Louisville is aligned with what is currently understood best practice for areas at wildfire risk. Louisville has been shown to be at risk by the Marshall Fire. Our county and state continue to face the hazards of fire. This building code will promote more resilient and safe neighborhoods. I do not presume to speak for them, but it is my understanding that our first responders support this code.

Building resilient is also economically smart. In the 2021 Insurance Institute for Business and Home Safety (IBHS) Report, *Building Codes and Standards: Advancements in Resiliency But Continued Resistance to Adoption and Enforcement* the IBHS estimates an “average return on investment of \$11 for every dollar spent on adopting modern codes”.

Beyond safety and economics, fire hardening code is also consistent with sustainability. Many of the firewise construction and landscaping methods use more durable materials that will last longer, such as rock mulch instead of bark mulch. Same for fences. Metal and other non-combustible materials should be promoted, especially where neighborhoods interface with grasslands or other wooded areas. Cedar fences are a liability because they are a fire hazard. Additionally, they deteriorate rapidly and they have to be replaced with some frequency. Metal fences are firewise and very durable. Including significant components of this topic in the proposed code is important and appreciated.

Regarding **Urban Defensible Space Non-Combustible surface/ landscaping 24” out from foundation** Item 8, this is not aligned with known best practice. In another IBHS report, *The Return of the Conflagration In Our Built Environment*, the authors and scientists that analyzed the data conclude that during the Marshall Fire: “One major vulnerability at the parcel level was present. Dense vegetation within the 0-5 foot home ignition zone was observed on nearly all homes. In addition the native grassland was interconnected with the neighborhood with no fuel breaks.” (pg. 13) They also concluded that during the Marshall fire, dense vegetation and wooden privacy fences provided a continuity of fuels. From speaking with neighbors and recreating events that day, it became apparent to us that our 6-ft privacy wooden fences ignited from the grass, which then ignited wooden decks and then our homes were quickly engulfed in flames. So far, myself and my neighbors in Cherrywood II have primarily rebuilt with non-combustible and fire resistant metal fences. However, as I look around town, including my own neighborhood I know the risk these fences pose and I would like for all neighbors to have safer construction and landscaping elements because it truly does matter.

This was their conclusion explaining why only 13/57 homes by Spring Drive survived the fire. These homes had large spaces between them and incorporated many elements of building hardscaping, yet they still burned because combustible vegetative landscaping elements were found in the 0-5 foot non-combustible zone. Maintaining a non-combustible zone 0-5 feet around the house is one of the key elements promoted by IBHS and has been adopted by firewise codes elsewhere. For many rebuilds, landscaping was up to us to decide. Many neighbors that have rebuilt, myself included, did not fully implement all the aspects of the landscaping recommendations because we were unaware of them and also pretty overwhelmed with the whole process. The landscaping and fencing conversation still requires further development and consideration. However, adopting this code is a huge positive step forward that I am very thankful for.

My experience rebuilding is that I was very lucky that I had a builder that constructed my home to firewise standards. Boulder Creek implemented many components of this code in the construction of my house without me asking for or fully understanding the complexities of fire hardening. Since moving back home, I have been pleasantly surprised by the firewise features Boulder Creek incorporated into their builds without there being specific code to require it. Code would make it certain that all new construction will have these features.

It is also wise to adopt this code because then it would be covered by Law and Ordinance insurance provisions in homeowners policies. Additionally, building to this code makes our homes and buildings more likely to maintain insurability. In these ways, this code promotes economic vitality. Adopting this fire hardening code brings our building code closer to best practice for promoting safety and sustainability. This makes a lot of sense for our community.

I would like to express gratitude to staff for drafting this code and for having this item on the agenda so quickly. On this issue, time is definitely of the essence. Thank you for your consideration and deliberation on this fire hardening code.

Sincerely,
Maria McClure
105 Cherrywood Lane

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From: [David Pomeroy](#)
To: [Building Safety](#)
Cc: [City Council](#)
Subject: Please adopt Home Hardening code, and let's go further
Date: Monday, August 26, 2024 10:02:10 PM

Hello,

I'd like to ask the City to adopt the proposed home hardening code that will be discussed at the building code meeting on Wednesday. This code will significantly improve our community wildfire defense as more homes are retrofitted with hardening measures. These rules are a sensible minimum that we need to implement as quickly as possible.

However, these rules don't go far enough and don't get the work done fast enough. Our town is a tinderbox of cedar fences, unscreened attics, and juniper bushes ready to spark. The city should also take aggressive action to reduce the fire risk caused by dangerous vegetation. Using whatever means is available, such as laws allowing for eradication of invasive or dangerous plants, the city should begin a process to identify and eliminate all of the juniper or other highly flammable plants within neighborhoods. They are simply too dangerous to have in our closely interdependent community.

Thank you,
David

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From: [Tawnya Somauroo](#)
To: [Building Safety](#); [Chad Root](#)
Subject: Board of Appeals - Home hardening
Date: Monday, August 26, 2024 10:12:07 PM

Dear Members of the Louisville Board of Appeals,

I am writing to express my strong support for advancing the home hardening code currently under consideration. This code is critical for ensuring the safety, insurability, and affordability of our community.

Implementing home hardening measures is both practical and cost-effective. With an estimated cost of \$5,000 to \$10,000 for a new build, these enhancements provide substantial protection against fire hazards at a relatively low cost to homeowners. Unlike the complexities often associated with energy codes, the principles of home hardening are straightforward and can be easily understood by builders if codified. This simplicity allows for seamless adoption and implementation, ensuring that our community can quickly and effectively improve its resilience.

Furthermore, home hardening plays a crucial role in keeping our community safe and insurable. As we have seen in other areas, homes that are better protected against fire are more likely to retain insurance coverage, which in turn helps maintain the affordability of living in our community. Without such measures, we risk higher insurance premiums or the loss of insurability altogether, leading to significant financial strain on homeowners.

I urge you to move the home hardening code forward for the benefit of our entire community. By doing so, we can safeguard our homes, ensure continued access to insurance, and maintain the affordability of our community.

Thank you for your time and consideration.

Sincerely,
Tawnya Somauroo

944 Larkspur Ln

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From: [Lisa Hughes](#)
To: [Chad Root](#); [City Council](#); [Rob Zuccaro](#)
Subject: Louisville Home Hardening Code
Date: Sunday, August 25, 2024 3:10:43 PM

To the Building Code Board of Appeals,

I am writing to support the adoption of the Louisville Home Hardening Code. This code will ensure upcoming and future construction in Louisville is aligned with what is currently understood best practice for areas at wildfire risk. Louisville has been shown to be at risk by the Marshall Fire. Our county and state continue to face the hazards of fire as evidenced by the 3 recent wildfires in the area. This building code will promote more resilient and safe neighborhoods. While I don't want to speak for them, it is my understanding that our first responders support this code. Chief Willson recently wrote a letter to Council in support of this code that was included in the July 30 City Council meeting packet.

Building resiliently is also economically smart. In the 2021 Insurance Institute for Business and Home Safety (IBHS) Report, *Building Codes and Standards: Advancements in Resiliency But Continued Resistance to Adoption and Enforcement* the IBHS estimates an "average return on investment of \$11 for every dollar spent on adopting modern codes".

Beyond safety and economics, fire hardening code is also consistent with sustainability. Many of the firewise construction and landscaping methods use more durable materials that will last longer, such as rock mulch instead of bark mulch. Same for fences. Metal and other non-combustible materials should be promoted, especially where neighborhoods interface with grasslands or back up to open space. Cedar fences are a liability because they are a fire hazard. Additionally, they deteriorate rapidly and they have to be replaced with some frequency. Metal fences are firewise and very durable. Including significant components of this topic in the proposed code is important and appreciated.

Regarding **Urban Defensible Space Non-Combustible surface/ landscaping 24" out from foundation** Item 8 from your agenda for the 8/24 meeting, this is not aligned with known best practice. In another IBHS report, *The Return of the Conflagration In Our Built Environment*, the authors and scientists that analyzed the data conclude that during the Marshall Fire: "One major vulnerability at the parcel level was present. Dense vegetation within the 0-5 foot home ignition zone was observed on nearly all homes. In addition the native grassland was interconnected with the neighborhood with no fuel breaks." (pg. 13) They also concluded that during the Marshall fire, dense vegetation and wooden privacy fences provided a continuity of fuels. Fences spread embers quickly into the built

environment and ignite houses on fire. IBHS has done multiple tests and research showing that wood fences contribute to fire spread. In Cornerstone, where I live, many of us have built back with fire resistant metal fences. Most have not. However, as I look around town, I see wood fences popping up all over the rebuilt neighborhoods including my own neighborhood. I know the risk these fences pose and I would like for all neighbors to have safer construction and landscaping elements because it truly does matter.

IBHS concluded that only 13/57 homes by Spring Drive survived the fire. These homes had large spaces between them and incorporated many elements of building hardscaping, yet they still burned because combustible vegetative landscaping elements were found in the 0-5 foot non-combustible zone. Maintaining a non-combustible zone 0-5 feet around the house is one of the key elements promoted by IBHS and has been adopted by firewise codes elsewhere. For many rebuilds, landscaping was up to us to decide. Many neighbors that have rebuilt, did not fully implement all the aspects of the landscaping recommendations because they were unaware of them, their builders/landscapers also weren't aware of them, and also we were pretty overwhelmed with the whole process. The landscaping and fencing conversation still requires further development and consideration. However, adopting this code is a huge positive step forward that I am very thankful for.

Here are some recent IBHS resources including a video with a fence burning that ignites a house.

- [NBC Bay Area with Chris Chmura](#)- great short video of the importance of defensible space
- IBHS Wildfire Prepared Home [website](#)
- IBHS [Wildland Fire Embers and Flames: Home Mitigations That Matter](#)
- IBHS [Noncombustible Zone 0: Minimizing Pathways to Home Ignition](#)
- IBHS [The Return of Conflagration in our Built Environment](#)

<https://headwaterseconomics.org/natural-hazards/austin-texas-built-for-wildfire/>

My builder did incorporate many fire safe aspects into my build, such as cementitious siding, a class A roof, pvc decking, etc. However, on many aspects of home hardening such as

putting mesh on vents, and on which products were fire safe- ie class A decking vs Class C we as homeowners had to educate them. This is why the code is so important so that it will give people a baseline to start with, and hopefully the City can provide more education to builders and landscapers.

Additionally, and maybe more importantly, from an insurance perspective, community home hardening and mitigation is critical for residents to maintain homeowners insurance in our city. In a recent town hall on homeowners insurance put on by the Colorado Sun, Carole Walker from the Rocky Mtn Insurance Association, an association representing insurance companies in Colorado, said that community mitigation is what insurers will be looking to in the future to keep communities and residents insured. I work for a non profit consumer organization called United Policyholders and we help homeowners work to keep and maintain insurance. Recently, in my role for UP, I was in a meeting with insurance agents last week who agreed with Ms.Walker that insurance companies will come to expect home hardening and mitigation, *just to keep residents insured in the coming years*. Now is the time for Louisville to act to pass this code, so that its citizens will be able to keep their homeowners insurance in the future and contribute to the economy of Louisville, and its vitality. Adopting this fire hardening code brings our building code closer to best practice for promoting safety and sustainability, and aligns with what many other communities in Colorado, Boulder County, and the nation have done. This makes a lot of sense for our community.

I would like to express much gratitude to staff for drafting this code and for having this item on the agenda so quickly. On this issue, time is definitely of the essence. Thank you for your consideration and deliberation on this fire hardening code.

Sincerely,

Lisa Hughes

887 Larkspur Court

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