



City Council

December 16, 2025
Packet Addendum #1

SUBJECT: DISCUSSION / DIRECTION: COLORADO WILDFIRE
RESILIENCY CODE AND CITY FIRE HARDENING CODE FOR
STRUCTURES

DATE: DECEMBER 16, 2025

PREPARED BY: ROB ZUCCARO, COMMUNITY DEVELOPMENT DIRECTOR
CHAD ROOT, CHIEF BUILDING OFFICIAL

PRESENTED BY: ROB ZUCCARO, COMMUNITY DEVELOPMENT DIRECTOR

SUMMARY:

Staff is presenting information on the State's minimum Wildland Urban Interface (WUI) code for discussion and direction. This discussion is intended to provide City Council with an overview of the State WUI code and provide an opportunity for feedback before staff drafts a local code for the formal adoption process. This review session will introduce the relevant topics, and staff anticipates that additional follow-up meetings and discussions will be needed before drafting a local code for adoption. The draft of the local code will also be reviewed by the Building Code Board of Appeals (BCBOA) before presenting the code to City Council for adoption.

Staff is also seeking direction on if Council is interested in adding defensible-space landscaping standards to the City's Fire Hardening Code for Structures ([LMC Chapter 15.70](#)). This code applies city-wide and is separate from the WUI code, which is intended to regulate only the developed areas at the interface with wildland vegetation that present elevated fire risk.

BACKGROUND / PRIOR DISCUSSIONS:

SB23-166

In 2023, the State passed SB23-166, which established the process for developing a minimum State WUI code and set requirements for local adoption of the State code or a local code meeting or exceeding State standards by April 1, 2026, with implementation required by July 1, 2026.

SB23-166 created the Wildfire Resiliency Code Board (WRCB) to develop and administer the State code. The Board membership is made up of a wide range of technical, industry, and local government experts. This includes 21 voting representatives from local municipal and county government, homebuilding and building code professions, fire behavior specialists, fire service professionals, property and casualty insurers, public and private utilities, and land-use planners. Three ex-officio members were also included on the WRCB from the State Forest Service, the State Department of Fire Protection and Control, and the Colorado Resiliency Office.

Development of the State code included extensive public outreach and feedback from the general public, industry representatives, building and fire science experts, local government representatives, and fire service professionals, which all informed the drafting of the code. Public meetings and public hearings were held throughout the State, exceeding the minimum requirements for public input included in the State legislation. The final draft of the code represents a consensus of the broad range of expertise included on the WRCB, extensive public input, and in consideration of the State-wide application of the code.

The WRCB adopted the 2025 Colorado Wildfire Resiliency Code (CWRC) and corresponding map on June 1, 2025, and adopted associated Rules and Regulations on July 1, 2025, establishing the State minimum standards.

Link: [SB23-166](#)

Link: [Adopted Wildfire Resiliency Code](#)

Link: [Adopted Rules and Regulations](#)

Link: [Adopted Wildfire Resiliency Code Map \(CWRC Map\)](#)

The CWRC defines the WUI as:

“That geographical area where structures and other human development meet or intermingle with wildland or vegetative fuels.”

The purpose of the State minimum code is to establish standards for development at the interface with wildland or vegetative fuels. It is not intended to provide broader fire-resiliency standards across an urban environment, as Louisville’s Fire Hardening Code for Structures ([LMC Chapter 15.70](#)) does.

Fire Intensity Classifications

The CWRC establishes and maps three Fire Intensity Classifications: Low, Moderate, and High. These classifications are based on factors including vegetative fuel types, anticipated flame length, terrain and topography, rate of spread and spotting, and suppression difficulty.

The CWRC map was developed with the State Forest Service and is based on the [2022 Colorado Wildfire Risk Assessment \(CO-WRA\)](#), which is also used for the State Forest Service’s [Wildfire Risk Viewer](#). The CWRC Map uses the CO-WRA data and aggregates and “smooths” the base data to account for local variability.

Regulated Elements

The CWRC regulates both Structure Hardening (Chapter 4) and Site and Area Requirements (Chapter 5) for new or existing development within Fire Intensity Classification areas. Site and Area Requirements, commonly referred to as “defensible space” standards, govern landscaping, fencing, storage of materials, and related features around structures.

Two classes of requirements apply:

- Class 1 standards apply to Low-intensity areas
- Class 2 standards apply to Moderate- and High-intensity areas

Low Intensity

Key Characteristics Include:

1. **Fuels:** Light to medium surface fuels, including grasses, shrubs, and scattered vegetation (e.g., WNL, USL fuel types).
2. **Flame Length:** Less than 2 feet.
3. **Rate of Spread:** Low, increasing with *slopes* over 20 percent.
4. **Spotting:** Very short-range spotting is possible under windy conditions.
5. **Terrain Influence:** More active fire behavior on moderate *slopes* (20 to 30 percent).
6. **Suppression Difficulty:** Easily suppressed by trained firefighters using basic protective gear and hand tools. Direct attack is effective, and mechanized support is rarely needed.

Class 1 Structure
Hardening and Site and
Area Requirements

Moderate Intensity

Key Characteristics Include:

1. **Fuels:** Moderate to heavy fuels, including dense shrublands, small trees, timber litter, and canopy fuels (e.g., USH, UIH fuel types).
2. **Flame Length:** Up to 8 feet.
3. **Rate of Spread:** Moderate to high, increasing significantly on *slopes* over 30 percent.
4. **Spotting:** Short-range spotting is common.
5. **Terrain Influence:** Steep *slopes* (30 percent or greater) increase fire spread and intensity.
6. **Suppression Difficulty:** Challenging for ground crews without support from engines, dozers, or aircraft. Dozers and plows are generally effective on moderate terrain.

Class 2 Structure
Hardening and Site and
Area Requirements

High Intensity

Key Characteristics Include:

1. **Fuels:** Heavy fuels, including dense forests, urban core areas with heavy fuel loads, and canopy-dominated regions (e.g., WNH, USH, UCH fuel types).
2. **Flame Length:** Up to 30 feet or more.
3. **Rate of Spread:** Rapid, especially on *slopes* greater than 40 percent.
4. **Spotting:** Short-range spotting is common; medium-range spotting is possible under windy conditions.
5. **Terrain Influence:** *Slopes* over 40 percent amplify intensity and spread, creating dangerous conditions for suppression.
6. **Suppression Difficulty:** Direct attack by ground forces and dozers is generally ineffective. Indirect strategies (backburning, aerial support) are often necessary. These fires present significant danger to life, property, and responder safety.

Summary of the Main Provisions of the CWRC

Class 1 – Structure Hardening

Building material and construction standards for:

- Roof coverings
- Gutters and downspouts
- Vent openings

Class 2 – Structure Hardening

Includes all Class 1 standards, plus additional standards for:

- Exterior walls
- Flashing
- Underfloor enclosures
- Decking surface
- Building projections
- Exterior windows
- Exterior doors
- Garage doors
- Detached accessory structures within 50 feet

Class 1 – Site and Area Requirements

Immediate Zone (0–5 feet from structure):

- Noncombustible hard-surface ground cover
- Planting prohibited, except ignition-resistant plants from the State Forest Service's Low-Flammability Landscape Plants list

Additional Class 1 requirements include:

- Tree pruning within 10 feet of structures
- Fences and retaining walls within 8 feet of structures
- Marking roads, fire protection equipment, and addresses

Class 2 – Site and Area Requirements

Includes all Class 1 standards, plus:

Intermediate Zone (5–30 feet)

- Removal of dead plant materials
- Reduction of surface fuel accumulation
- Tree spacing and pruning
- Shrub spacing

Expanded Zone (30–100 feet)

- Tree crown spacing requirements

Additional Provisions

The CWRC includes appendices on Permits, Construction Documents, and Inspections and Enforcement.

The CWRC is not retroactive and includes the following additional provisions:

- Additions to existing structures with a footprint of 500 sq. ft. or more must comply
- Roof covering replacement exceeding 25% of roof area must comply
- Exterior wall replacement exceeding 25% of exterior wall area must comply
- Exemptions and variances are provided for historic structures
- A “Ground Truthing” process allows Code Officials to adjust classifications based on site-specific conditions and vegetative fuels within 300 feet

The Rules and Regulations allow jurisdictions to adopt a local map consistent with State standards. Jurisdictions may also petition the WRCB for code modifications. Local Code Officials may approve alternative materials, designs, and methods that meet the code’s intent.

Ordinance No. 1884-2024 – Fire Hardening Code for Structures

On November 4, 2024, City Council adopted Ordinance No. 1884, Series 2024, establishing city-wide minimum fire-hardening standards for all new residential and commercial structures – the [Fire Hardening Code for Structures](#). Adoption followed City Council’s July 30, 2024 discussion, which evaluated options for adopting local WUI and structure-hardening codes.

The code regulates the following building systems:

- Roof coverings
- Siding and eave materials
- Deck surface materials
- Vent coverings
- Gutter materials and guards
- Fencing materials (within 5 feet of structures)
- Solar panel screens

The code is intended to address both wildland fires and conflagration fires and was initiated based on a recommendation from the Louisville Fire Protection District. At the time of adoption, City Council was aware that the State WUI code was forthcoming and chose to limit scope pending adoption of a local WUI code.

The 2025 City Council Work Plan includes evaluation of adding defensible-space landscaping standards to the city-wide fire-hardening requirements.

LINK: [July 30, 2024 City Council Discussion/Direction Memorandum](#)

LINK: [November 4, 2024 City Council Code Adoption Memorandum](#)

ANALYSIS:**Wildfire Spread**

Fire spreads from wildland areas to structures through embers, radiant heat, or direct flame contact. Ember spread is the most common mechanism for wildland fire ignition of structures. Embers can ignite fuels around a structure, enter through vents or other openings, or directly ignite exterior building materials. Understanding the most likely pathways for fire to transition from wildlands into urban areas helps prioritize appropriate mitigation strategies. For example, a Home Hardening building code may focus primarily on preventing ember intrusion, since it is the most frequent source of ignition. A WUI code, by contrast, may place additional emphasis on landscaping and vegetation maintenance to reduce the risk of direct flame contact and fire spread through nearby trees or shrubs.

Link: [Summary of How Fire Spreads in the WUI \(nist.gov\)](https://www.nist.gov/publications/summary-how-fire-spreads-wui)

In addition, three main environmental factors influence wildland fire intensity and spread: topography, weather, and fuel. Steep slopes, channels, and gullies accelerate fire spread, and these natural features offer limited opportunities for mitigation. Weather, particularly wind and drought, also plays a major role in fire behavior and cannot be controlled. During the Marshall Fire, extreme wind and prolonged drought significantly contributed to fire spread both from wildland areas into urban neighborhoods and to the rapid conflagration within the neighborhoods themselves.

The type and amount of vegetation, or vegetative fuel, also affects fire intensity. Different vegetation types produce different ember loads, radiant heat levels, and flame spread characteristics.

Staff Recommended Amendments to CWRC

Staff recommends using the CWRC as the baseline for a local code but recommends adding the following provisions to strengthen the code and align it with the city-wide Fire Hardening Code for Structures:

Add the following provisions to Class 1 – Structure Hardening:

- Fire resistant siding meeting Class A standards.
- Fire resistant eaves meeting Class A standards.
- Fire resistant decking surface, stairs, and railings meeting Class A standards and require the surface below a deck 6 feet or closer to the ground to be concrete or gravel above 6 mil plastic.
- Gutter covers to prevent accumulation of debris.

Add the following provisions to Class 2 – Structure Hardening:

- Fire-resistant siding meeting Class A standards.
- Fire-resistant eaves meeting Class A standards.
- Fire-resistant decking surface, stairs, and railings meeting Class A standards, and a requirement that the surface below any deck located 6 feet or closer to the ground be concrete or gravel placed above 6-mil plastic.

While the City's Fire Hardening Code for Structures only allows Class A exterior materials, the CWRC allows several alternatives to Class A building materials that are considered "Noncombustible." Some of these alternatives are less stringent than Class A standards in order to provide greater flexibility for meeting strengthened standards above base codes, adding to building resilience, while still taking into consideration other factors such as cost, feasibility, design preferences, and a wide range of building types across the State.

The CWRC also only regulates deck surfaces material, but not railings or materials under a deck, as does the City's Fire Hardening Code for Structures. Railings are typically open and do not have the same capacity to collect embers as would a solid property boundary fence. The deck surface material hardening addresses a primary safety concern around egress from the building in case of a fire.

Add the following provision to Class 2 – Site and Area Design:

- Dormant grasses and weeds must be mowed to a height not to exceed six inches

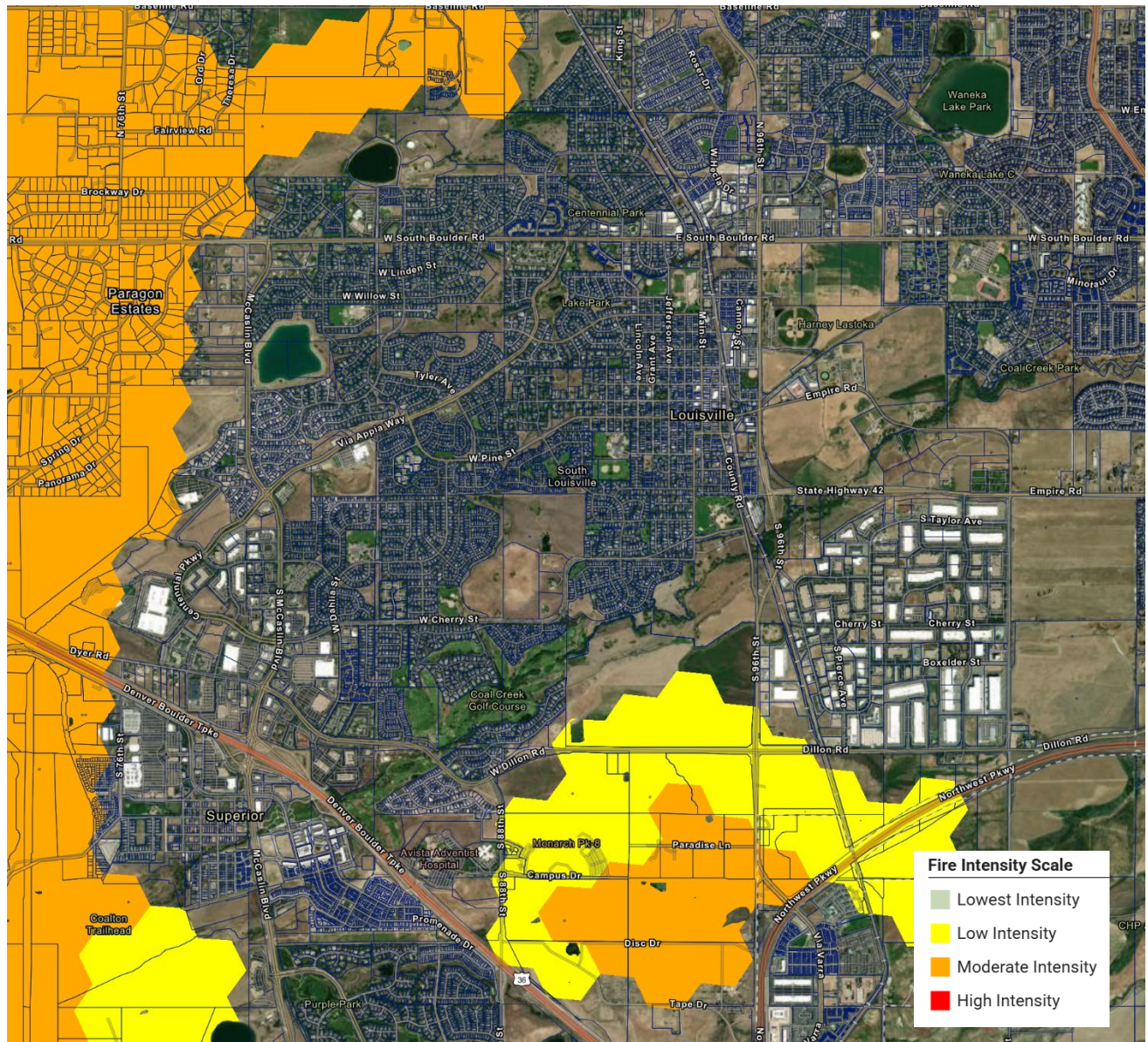
There may also be value in creating additional categories of regulation for Louisville depending on City Council direction. For example, the City could create a third class applicable city-wide that reflects the existing Fire Hardening Code for Structures, either as currently drafted or with amendments, and then establish two additional classes of regulations based on fire-risk levels.

Regulatory Map

The CWRC Map designates the minimum areas subject to the State code standards based on probable fire intensity and the potential for fire spread within those areas. The classification layers have been adjusted using smoothing, filtering, and aggregation techniques to address the granular variability present in the underlying data and to eliminate small "occluded" areas in urban environments that present relatively low risk. As previously discussed, these mapping classifications determine where the Class 1 or Class 2 standards apply.

In Louisville, large areas to the west and north of the City are designated as Moderate Fire Intensity. There is also an area south of the City, including portions of the Warembourg, Bowes, and Admore Open Spaces; the Monarch K-12 Campus; the Coal Creek Medical Campus; Juniper Village Assisted Living; and parts of Redtail Ridge—

Figure 2: 2025 CWRC Map



Council will need to consider if there are desired amendments to this map. The City may consider adopting a map that is more stringent than the CWRC Map or conduct its own study to develop a local map based on the same technical factors used to develop the CWRC Map. The CO-WRA mapping data and the [Wildfire Risk Viewer](#), which provide the baseline data for the CWRC Map, also include several other data layers and more granular data that may inform a local map for Louisville.

In addition, the Louisville Fire Protection District (LFPD) is completing a Wildfire and Conflagration Risk Assessment that is scheduled for completion in early 2026. The study is being conducted by the Ember Alliance in consultation with Dr. Husaam Mahmoud of InFoRM, LLC. Staff has been working with the consultants and LFPD on preliminary modeling that will inform the final assessment. The modeling focuses primarily on conflagration risks but may also provide useful insights into WUI fire spread and structure vulnerability. A conflagration fire is one that spreads uncontrollably from structure to structure, regardless of whether the fire originated in wildland vegetation.

Considerations for determining the extent of the City's local WUI map could include:

- Major roads can function as fire breaks and may serve as logical boundaries for the map.
- Neighborhood boundaries may also provide logical mapping lines and would allow uniform regulation within each neighborhood.
- Smaller "occluded" wildland areas surrounded by development, such as Coyote Run Open Space and Daughenbaugh/Warembourg Open Space, contain varying Fire Intensity Classifications in the Wildfire Risk Viewer but are not included in the CWRC Map. Mapping methodology may consider not regulating around such "occluded" areas, as they generally pose relatively low risk: fires in these locations are more likely to be detected early, fire personnel can typically access them quickly, and these areas do not provide the same opportunities for fire growth that could overwhelm suppression efforts.
- The Coal Creek corridor also shows varying Fire Intensity Classifications in the Wildfire Risk Viewer but is not included in the CWRC Map. While it shares some characteristics with "occluded" areas, it also poses additional fire-spread risk because it contains continuous wildland vegetation connected to larger wildland areas, increasing the potential for more extensive and harder-to-suppress fire spread.
- The potential for ember spread under high-wind conditions may also inform preferred mapping boundaries. Winds predominantly come from the west and southwest, and large areas of wildland vegetation lie west of the City. Although larger wildland areas also exist to the north, significant winds from the north are uncommon.
- The CWRC Fire Intensity Classifications are based on vegetative fuel type, anticipated flame length, terrain and topography, rate of spread and spotting, and suppression difficulty. Proximity of existing development to these areas is not fully accounted for in the CWRC Map. The CO-WRA and LFPD Wildfire and

Conflagration Risk Assessment modeling may provide additional guidance on areas that could be included within the regulatory boundaries.

City-Wide Defensible Space Standards

The 2025 City Council Work Plan includes consideration of adding defensible space landscaping standards to the city-wide Fire Hardening Code for Structures. Staff is seeking direction on if Council is interested in having further discussion on adding these standards City-wide.

With the initial adoption of the Fire Hardening Code for Structures, defensible space standards were discussed but ultimately not included in the final code draft. The LFPD's recommendations to adopt a structure hardening code did not include a request for defensible space standards.

In addition, there were concerns over the feasibility and staff capacity to implement city-wide defensible space standards. For such standards to be effective in reducing conflagration risk, there would need to be widespread compliance with such standards, including in already developed areas of the City.

If Council is interested in further consideration of adding defensible space standards City-wide, staff recommends that a follow-up discussion/direction session be scheduled where staff can provide additional information and analysis.

2025 COUNCIL WORK PLAN:

Both the WUI code adoption and consideration of city-wide defensible space standards are listed under the Council Priority for Safety.

Wildland Urban Interface (WUI) Code	In 2024 City Council provided direction to pursue a WUI code. Senate Bill 23-166 requires the state to adopt a state-wide minimum WUI code and define areas of applicability by July 1, 2025 and includes a three-month period for local adoption.
Potential Citywide Defensible Space	An opportunity to understand potential citywide defensible space policies to aid in wildfire mitigation and preparedness.

FISCAL IMPACT:

Budgeted?: **No**

City Fiscal Impact

Implementation of the WUI code and city-wide defensible space standards is not currently budgeted or staffed. Existing staffing levels are likely adequate for permit reviews and inspections related to Structure Hardening requirements, which can be incorporated into existing processes within the Building Division. However, Site and Area inspections and city-wide defensible space standards will require an expansion of current permit administration and may necessitate additional staffing and city resources.

Community Fiscal Impact

Based on a 2020 study by the National Association of Homebuilders, implementing the 2018 version of the International Wildland Urban Interface Code (IWUIC) in Colorado would result in an estimated increase in construction cost for a two-story, 2,600 sq. ft. home between \$6,248 and \$48,095. The CWRC is based on the IWUIC, and therefore this provides an applicable comparison of cost to standards construction methods. Most standard commercial construction methods already utilize fire resistant materials, thus, the financial impact will be limited.

Link: [Cost Impact of Building a House in Compliance with IWUIC \(nahb.org\)](https://www.nahb.org/cost-impact-of-building-a-house-in-compliance-with-iwuic)

One of the desired results of the State minimum WUI code is to stabilize insurance costs, especially for those building in and near the WUI. By establishing minimum building standards and incentivizing new development outside of high-risk areas, the hope is that there will be a more resilient built environment resulting in fewer insurance claims. It is staff's understanding that the insurance industry has its own proprietary WUI mapping and methodology, and does not use other sources, such as the CWRC Map, to underwrite insurance.

ALTERNATIVE(S):

The following are questions for Council to help inform next steps for drafting the City's local WUI code and map, and potential changes to the city-wide Fire Hardening Code for Structures:

Adoption of Local WUI Code

- Does Council support staff's recommended strengthening amendments to the base CWRC for Structure Hardening and Site and Area Design? Are there additional amendments Council would like staff to consider or include in the draft code, or any further information Council would like regarding the Structure Hardening and Site and Area Design requirements?
- Rather than identifying specific map boundaries at this meeting, staff recommends that Council take time to review and consider the various maps, datasets, and methodologies used in developing the different maps, and review the LFPD Wildfire and Conflagration Risk Assessment when it is complete early next year. Staff has also provided a list of mapping considerations outlined earlier in this report that Council may provide input or direction around. Staff

would then develop draft mapping options based on this preliminary Council input and provide analysis and pros and cons of the different mapping options at a future meeting.

- Would City Council like to have a public input meeting to review mapping options and the staff-recommended Structure Hardening and Site and Area amendments recommended by staff prior to further review and consideration?

Adoption of City-Wide Defensible Space Standards

Is Council interested in having further discussion on adding City-wide defensible space standards to the Fire Hardening Code for structures? If so, staff could develop further analysis of costs, administrative requirements, and other pros and cons for adding these standards city-wide.

RECOMMENDATION:

Staff recommends using the CWRC as the base code and adding the following provisions to strengthen the standards and align them with the city-wide Fire Hardening Code for Structures code:

Add the following provisions to Class 1 – Structure Hardening:

Fire resistant siding meeting Class A standards.

- Fire resistant eaves meeting Class A standards.
- Fire resistant decking surface, stairs, and railings meeting Class A standards and require the surface below a deck 6 feet or closer to the ground to be concrete or gravel above 6 mil plastic.
- Gutter covers to prevent accumulation of debris.

Add the following provisions to Class 2 – Structure Hardening:

- Fire-resistant siding meeting Class A standards.
- Fire-resistant eaves meeting Class A standards.
- Fire-resistant decking surface, stairs, and railings meeting Class A standards, and a requirement that the surface below any deck located 6 feet or closer to the ground be concrete or gravel placed above 6-mil plastic.

Add the following provision to Class 2 – Site and Area Design:

- Dormant grasses and weeds must be mowed to a height not to exceed six inches

Staff does not have a specific recommendation on the final WUI map at this time and is seeking feedback on Council's highest priorities and the key tenets and principles Council would like reflected in a local WUI map. Based on Council's direction, staff will develop mapping options and provide additional analysis, including pros and cons for the different options. Council will then be able to provide additional guidance on a final draft local map to be considered with the code adoption.

SUBJECT: DISCUSSION / DIRECTION: WILDFIRE AND HOME HARDENING CODE

DATE: DECEMBER 16, 2025

PAGE 13 OF 13

Staff does not have a specific recommendation regarding the addition of city-wide defensible space landscaping standards to the Fire Hardening Code for Structures and is seeking direction from Council. Based on Council direction, next steps would be for staff to develop further analysis of costs, administrative requirements, and other pros and cons for adding these standards city-wide.

ATTACHMENTS:

1. Staff Presentation

City Council Discussion/Direction

December 16, 2025

- **City Adoption of Colorado Wildfire Resiliency Code (CWRC)**
- **Addition of Defensible Space Standards to Fire Hardening Code for Structures (LMC Chapter 15.70)**

Presented by Rob Zuccaro, Community Development Director

Council Questions

Staff is presenting three main topics for Council feedback:

1. Support for CWRC base code and staff recommended strengthening amendments to Structure Hardening and Site and Area Design
2. Feedback on mapping priorities, key tenants and principles to be used in development of regulatory map
3. Consideration of adding defensible space standards to City-wide Fire Hardening Code for Structures

This meeting is intended as an introduction to these topics, and based on Council feedback, additional Council discussion/direction session will be needed to guide development of the code.

SB23-166: Colorado Wildfire Resiliency Code

- Establishes State-wide minimum code standards for a Wildland Urban Interface (WUI) building code.
- Code developed by Wildfire Resiliency Code Board (WRCB)
 - 21 Voting Members: representing local government, homebuilding and building code professions, fire behavior specialists, fire service professionals, property and casualty insurers, public and private utilities, and land-use planning. Ex Officio Members: State Forest Service, the State Department of Fire Protection and Control, and the Colorado Resiliency Office
- 2025 CWRC, CWRC Map, and Rules and Regulations Adopted in June and July 2025. City must adopt code or local code that meets or exceeds standards by April 1, 2026, and implement code by July 1, 2026
- WUI Definition: “That geographical area where structures and other human development meet or intermingle with wildland or vegetative fuels.”

SB23-166: Colorado Wildfire Resiliency Code

- Establishes three Fire Intensity Classifications and Two Classes of Regulations

Low Intensity

Key Characteristics Include:

1. **Fuels:** Light to medium surface fuels, including grasses, shrubs, and scattered vegetation (e.g., WNL, USL fuel types).
2. **Flame Length:** Less than 2 feet.
3. **Rate of Spread:** Low, increasing with *slopes* over 20 percent.
4. **Spotting:** Very short-range spotting is possible under windy conditions.
5. **Terrain Influence:** More active fire behavior on moderate *slopes* (20 to 30 percent).
6. **Suppression Difficulty:** Easily suppressed by trained firefighters using basic protective gear and hand tools. Direct attack is effective, and mechanized support is rarely needed.

Class 1 Structure
Hardening and
Site and Area
Requirements

Moderate Intensity

Key Characteristics Include:

1. **Fuels:** Moderate to heavy fuels, including dense shrublands, small trees, timber litter, and canopy fuels (e.g., USH, UIH fuel types).
2. **Flame Length:** Up to 8 feet.
3. **Rate of Spread:** Moderate to high, increasing significantly on *slopes* over 30 percent.
4. **Spotting:** Short-range spotting is common.
5. **Terrain Influence:** Steep *slopes* (30 percent or greater) increase fire spread and intensity.
6. **Suppression Difficulty:** Challenging for ground crews without support from engines, dozers, or aircraft. Dozers and plows are generally effective on moderate terrain.

High Intensity

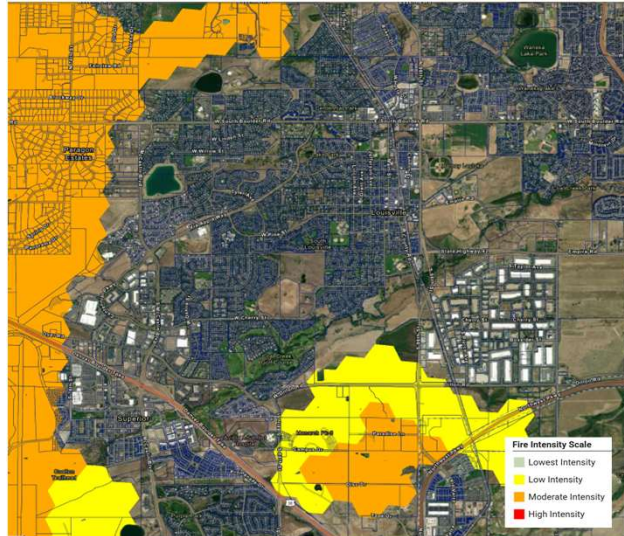
Key Characteristics Include:

1. **Fuels:** Heavy fuels, including dense forests, urban core areas with heavy fuel loads, and canopy-dominated regions (e.g., WNH, USH, UCH fuel types).
2. **Flame Length:** Up to 30 feet or more.
3. **Rate of Spread:** Rapid, especially on *slopes* greater than 40 percent.
4. **Spotting:** Short-range spotting is common; medium-range spotting is possible under windy conditions.
5. **Terrain Influence:** *Slopes* over 40 percent amplify intensity and spread, creating dangerous conditions for suppression.
6. **Suppression Difficulty:** Direct attack by ground forces and dozers is generally ineffective. Indirect strategies (backburning, aerial support) are often necessary. These fires present significant danger to life, property, and responder safety.

Class 2 Structure
Hardening and
Site and Area
Requirements

SB23-166: Colorado Wildfire Resiliency Code

- CWRC Map – Aggregates and “Smooths” Fire Intensity Scale Boundaries
- Based on 2022 CO-WRA Data



SB23-166: Colorado Wildfire Resiliency Code

- Class 1 Structure Hardening
 - Roof coverings
 - Gutters and downspouts
 - Vent openings
- Class 2 Structure Hardening
 - Includes all Class 1 standards, plus:
 - Exterior walls
 - Flashing
 - Underfloor enclosures
 - Decking surface
 - Building projections
 - Exterior windows
 - Exterior doors
 - Garage doors
 - Detached accessory structures within 50 feet



Figure 11. Importance of 0-5 ft. noncombustible zone (home ignition zone) for a home under ember attack.

Allows several options for “Ignition Resistant” and “Non-Combustible” materials.

SB23-166: Colorado Wildfire Resiliency Code

- Class 1 Site and Area

- Immediate Zone (0–5 feet from structure):

- Noncombustible hard-surface ground cover
 - Planting prohibited, except ignition-resistant plants from the State Forest Service's Low-Flammability Landscape Plants list

- Additional requirements outside of Immediate Zone:

- Tree pruning within 10 feet of structures
 - Fences and retaining walls within 8 feet of structures
 - Marking roads, fire protection equipment, and addresses

- Class 2 Site and Area

- Includes all Class 1 standards, plus:

- Intermediate Zone (5–30 feet from structure):

- Removal of dead plant materials
 - Avoidance of surface fuel accumulation
 - Tree spacing and pruning from structure and above ground

- Shrub spacing from structures and trees

- Expanded Zone (30–100 feet from structure):

- Tree spacing from other trees (crowns 6-10 feet apart)

SB23-166: Colorado Wildfire Resiliency Code

Additional Provisions in CWRC:

- Appendices on Permits, Construction Documents, and Inspections
- Additions with footprint of 500 sq. ft. or more must comply for the addition
- Exterior wall replacement exceeding 25% triggers compliance for all wall materials
- Roof covering replacement exceeding 25% triggers compliance for all roof materials
- Exemptions and variances allowed for historic structures
- “Ground Truthing” process established to all adjustments based on site-specific conditions, taking into account vegetation within 300 ft. (Addresses new developments with over-lot grading that removes vegetative fuels.)

SB23-166: Colorado Wildfire Resiliency Code

- **Potential Strengthening Amendments and Alignment with City-Wide Fire Hardening Code for Structures:**

Class 1 – Structure Hardening:

- Fire-resistant siding meeting Class A standards.
- Fire-resistant eaves meeting Class A standards.
- Fire-resistant decking surface, stairs, and railings meeting Class A standards and require the surface below a deck 6 feet or closer to the ground to be concrete or gravel above 6 mil plastic.
- Gutter covers to prevent accumulation of debris.

Class 2 – Structure Hardening:

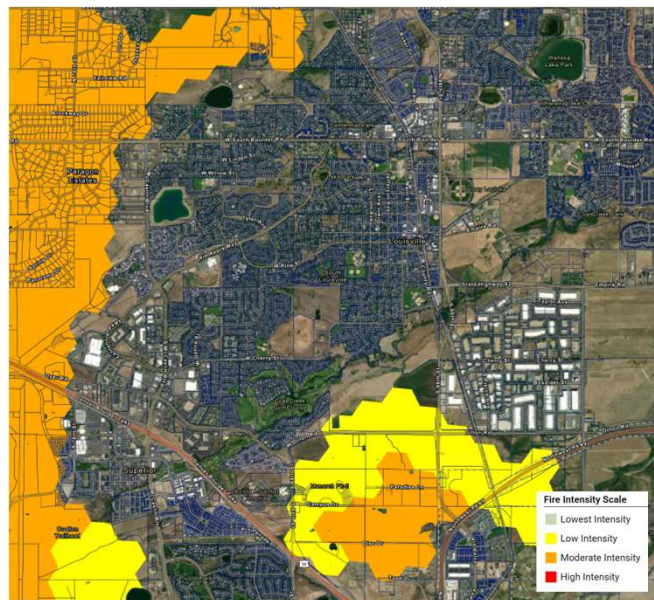
- Fire-resistant siding meeting Class A standards.
- Fire-resistant eaves meeting Class A standards.
- Fire-resistant decking surface, stairs, and railings meeting Class A standards, and a requirement that the surface below any deck located 6 feet or closer to the ground be concrete or gravel placed above 6-mil plastic.

Class 2 – Site and Area Design:

- Dormant grasses and weeds must be mowed to a height not to exceed six inches

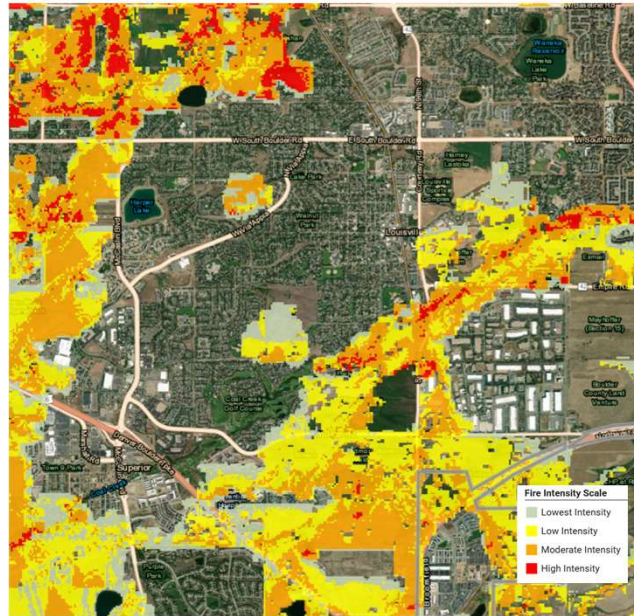
CWRC Map

- The City has the option to adopt a map that meets or exceeds CWRC Map or develop a custom map based on same technical standards used in CWRC Map to develop Fire Intensity Classifications.
- The classification layers have been adjusted using smoothing, filtering, and aggregation techniques to address the granular variability present in the underlying data and to eliminate small “occluded” areas in urban environments that present relatively low risk.
- New development or redevelopment within the designated fire intensity areas would be required to meet either the Class 1 or Class 2 standards.



Mapping Input

- Colorado State Forrest Service [Wildfire Risk Viewer](#)
- Uses same CO-WRA data as CWRC Map
- More granular 20-meter square data sets
- Includes additional layers to inform potential map boundaries, e.g.:
 - Wildland Urban Interface Risk
 - Building Damage Potential



Mapping Input

- **LFPD Wildland and Conflagration Risk Assessment**
 - Study in progress, due early 2026
 - Modeling focuses on Conflagration Risk but provides insights on WUI fire spread

Mapping Considerations

- Major roads can function as fire breaks and may serve as logical boundaries for the map.
- Neighborhood boundaries may also provide logical mapping lines and would allow uniform regulation within each neighborhood.
- Smaller “occluded” wildland areas surrounded by development, such as Coyote Run Open Space and Daughenbaugh/Warembourg Open Space, contain varying Fire Intensity Classifications in the Wildfire Risk Viewer but are not included in the CWRC Map.
 - Mapping methodology may consider not regulating around such “occluded” areas, as they generally pose relatively low risk: fires in these locations are more likely to be detected early, fire personnel can typically access them quickly, and these areas do not provide the same opportunities for fire growth that could overwhelm suppression efforts.
- The Coal Creek corridor also shows varying Fire Intensity Classifications in the Wildfire Risk Viewer but is not included in the CWRC Map.
 - While it shares some characteristics with “occluded” areas, it also poses additional fire-spread risk because it contains continuous wildland vegetation connected to larger wildland areas, increasing the potential for more extensive and harder-to-suppress fire spread.

Mapping Considerations Cont.

- The potential for ember spread under high-wind conditions may also inform preferred mapping boundaries.
 - Winds predominantly come from the west and southwest, and large areas of wildland vegetation lie west of the city. Although larger wildland areas also exist to the north, significant winds from the north are uncommon.
- The CWRC Fire Intensity Classifications are based on vegetative fuel type, anticipated flame length, terrain and topography, rate of spread and spotting, and suppression difficulty. Proximity of existing development and development density in these areas is not fully accounted for in the CWRC Map
 - The Wildfire Risk Viewer’s Wildland Urban Interface Risk layer or the LFPD Wildfire and Conflagration Risk Assessment modeling may provide additional guidance on areas that could be included within the regulatory boundaries.

LMC Chapter 15.70 – Fire Hardening for Structures

- Adopted in 2024, applicable City-wide for new development and redevelopment or certain alternations
- The code regulates the following building systems:
 - Roof coverings
 - Siding and eave materials
 - Deck materials
 - Vent coverings
 - Gutter materials and guards
 - Fencing materials (within 5 feet of structures)
 - Solar panel screens
- Defensible space landscaping standards not included in original code.
- Adopted based on recommendations by the LFPD
- City Council Workplan Item for 2025

Potential Citywide Defensible Space

An opportunity to understand potential citywide defensible space policies to aid in wildfire mitigation and preparedness.



LMC Chapter 15.70 – Fire Hardening for Structures

Louisville Fire Projection District Request

Dear Mr. Mayor and City Council,

I believe the City will be reviewing and adopting new building codes this fall. The Louisville Fire Protection District would like to suggest adopting an amendment to help the Fire District protect homes. The amendment would have the following items for home hardening;

- Class A roof
- Double or triple-pane windows
- Fire resistance siding
- Fire resistance decking
- Fire resistance fencing within 5 ft of the home
- Small screen over attic vents

These items would be required only if it was new construction or if the above item is being replaced.



Council Questions

Staff is presenting three main topics for Council feedback:

1. Support for CWRC base code and staff recommended strengthening amendments to Structure Hardening and Site and Area Design
2. Feedback on mapping priorities, key tenants and principles to be used in development of regulatory map
3. Consideration of adding defensible space standards to City-wide Fire Hardening Code for Structures

This meeting is intended as an introduction to these topics, and based on Council feedback, additional Council discussion/direction session will be needed to guide development of the code.

Council Questions

Does Council support staff's recommended strengthening amendments to the base CWRC for Structure Hardening and Site and Area Design? Are there additional amendments Council would like staff to consider or include in the draft code, or any further information Council would like regarding the Structure Hardening and Site and Area Design requirements?

Council Questions

Adoption of local WUI Code

- Does Council support staff's recommended strengthening amendments to the base CWRC for Structure Hardening and Site and Area Design? Is there any additional feedback for further information Council would like regarding the Structure Hardening and Site and Area Design requirements?
- Does Council have initial input on the most important priorities, mapping considerations, and the key tenets and principles that should be reflected in a local WUI map? Staff will then develop draft mapping options based on this guidance and present them for discussion at a future meeting along with further analysis and pros and cons of the different mapping.
- Would City Council like to have a public input meeting to review mapping options and the staff-recommended Structure Hardening and Site and Area amendments recommended by staff prior to further review and consideration?

Council Questions

Adoption of local WUI Code

- Is Council interested in having further discussion on adding City-wide defensible space standards to the Fire Hardening Code for structures? If so, staff could develop further analysis of costs, administrative requirements, and other pros and cons for adding these standards city-wide.

Council Questions

Does Council have any other questions or direction for staff?

From: [David Secunda](#)
To: [City Council](#)
Subject: Item on Dec 16th Agenda: Lease Amendment for AVID4 ADVENTURE
Date: Monday, December 8, 2025 2:49:39 PM
Attachments: [Proposed City of Louisville Resolution.pdf](#)

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Greetings,

For well over a year, we have been working diligently with staff to extend our lease on 1501 Empire. As part of this process, Councilmen Copperman and Hoefner have both recently visited the facility to see our operations and meet the numerous other small-businesses that call it home. After extensive communication, we learned that the City is contemplating a sale and thus only a short term extension will be possible. The Avid lease is scheduled to come before you on December 16th (15 days before our current five-year lease expires). As you can imagine, this late timing has created significant concern. Additionally, this is combined with recent clarifications from City staff that materially impact our year end finances.

Regarding these recent "clarifications", the key issue is the calculation of "excess rent" due to the City. Here's some additional information:

1. Excess Rent Calculation (Inside Space):

Historically, we paid 50% of sub-lease revenue exceeding the base rate for our inside space. For 2025, we operated under City guidance, including assurances from our City liaison and review by the City Finance Director (who wrote, "The approach is very reasonable. I agree with it."), that allows us to calculate this payment after deducting NNN expenses (insurance, maintenance, utilities). Based on the guidance in Q4 2024, we re-wrote our sub-lease template in January to clearly define NNN. These sub-leases were reviewed and attested to by the Mayor and City Clerk.

In early November, the City retroactively clarified that this interpretation was incorrect, resulting in an unbudgeted payment of over \$16,000, which we have now paid. We consider this resolved as the proposed new lease eliminates this clause in favor of a higher per square foot charge.

2. Excess Rent Calculation (Outside Yard Space):

A second, more alarming clarification regards excess rent for sub-leases that include outside yard space. We previously calculated our payment using a City-provided spreadsheet template that lined out yard space payments, as there was no square footage rate against which to calculate "excess." We used this template (annually updating it and providing it to the City) to pay excess rent for the past five years.

Recently, the City informed us the template was incorrect, asserting that 50% of all sub-lease revenue for outside space is due to the City. This potentially results in yet another material, unbudgeted end-of-year payment.

To address this second issue, staff has proposed a *backwards-looking* lease re-wording to eliminate excess rent due on yard space (in addition to the 18-month forward extension), which is the primary focus of our request (to support this when it comes before you).

The uncertainty stemming from these last-minute changes has negatively impacted our ability to stabilize our operations, preventing us from filling available space and causing concern among the 13 small businesses operating within our building.

We seek Council's support to foster a stable operating environment. To align with a mutually beneficial partnership, we respectfully ask for your support for the proposed backwards-looking lease amendment concerning excess rent on yard space when it comes to Council on the 16th (For reference, attached is the Resolution that we drafted and provided to staff to this effect. Our understanding from our City liaison is that the City Attorney is drafting language to the same effect, but elected not to use the attached).

Please let me know if there is any additional information that would be helpful. I'll be there on the 16th and plan to speak either during the open public comment time, or if allowed, to respond to questions during Council's consideration of the issue.

--

With Gratitude,
Dave

David Secunda, Founder & CEO

[He/Him/His](#)

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A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOUISVILLE, COLORADO, AMENDING SECTION 8.4 OF THE LEASE AGREEMENT BETWEEN THE CITY OF LOUISVILLE AND AVID4 ADVENTURE, INC. REGARDING EXCESS RENT FOR NON-BUILDING PREMISES.

WHEREAS, the City of Louisville ("LANDLORD") and AVID4 ADVENTURE, INC. ("TENANT") are parties to a Lease Agreement (the "Lease") dated February 1, 2020, for the premises located at 1501 Empire Road, Louisville, Colorado; and

WHEREAS, Section 8.4 of the Lease, titled "ADDITIONAL CONDITIONS; EXCESS RENT," establishes conditions under which TENANT may be required to pay the LANDLORD a portion of rent or other economic consideration received from Transfers (subleases); and

WHEREAS, the second sentence of Section 8.4 specifically states that "the full amount of rent or other economic consideration received by TENANT for any portion of the Premises not contained within a building shall be considered excess rent" for the purpose of calculating 50% payment to the LANDLORD; and

WHEREAS, throughout a significant portion of the current Lease term, TENANT has operated under an understanding, informed by past guidance and interpretation, that this specific provision did not apply to sub-lease revenue generated from areas of the Premises not contained within a building (e.g., yard storage); and

WHEREAS, a recent clarification from City staff regarding the application and enforcement of this specific provision has indicated a requirement for TENANT to pay 50% of such non-building sub-lease revenue as excess rent, which constitutes a material financial impact and potential retroactive liability for TENANT; and

WHEREAS, the City Council desires to support its local businesses, foster predictable and stable operating environments, and maintain strong tenant relationships within the community; and

WHEREAS, for upcoming lease terms, specifically effective 2026, the City has elected to remove the "excess rent" clause for non-building space from the lease structure, opting instead for a revised, higher overall monthly lease rate that incorporates the value of the entire leased property; and

WHEREAS, to resolve the current misunderstanding, provide clarity, mitigate material financial impact to TENANT for the current Lease term, and align the spirit of the existing Lease with the City's forward-looking leasing strategy and a mutually beneficial tenant relationship, it is deemed to be in the best interest of the City to amend the application of Section 8.4 for the duration of the current Lease term;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LOUISVILLE, COLORADO, THAT:

1. **Amendment to Section 8.4:** For the remaining duration of the Lease Agreement dated February 1, 2020, between the City of Louisville and AVID4 ADVENTURE, INC., the second sentence of Section 8.4 of said Lease, which states "For purposes of this Section 8.4, the full amount of rent or other economic consideration received by TENANT for any portion of the Premises not contained within a building shall be considered excess rent," shall be and is hereby **waived and rendered null and void**. Consequently, TENANT shall not be obligated to pay any excess rent to LANDLORD under Section 8.4 specifically derived from rent or other economic consideration received from sub-leases of areas of the Premises not contained within a building.
2. **Retroactive Application:** This amendment shall apply retroactively to the commencement date of the Lease, February 1, 2020, effectively waiving any prior, current, or future claim by the City for excess rent under the aforementioned clause.
3. **Other Provisions Unchanged:** All other terms, covenants, and conditions of the Lease Agreement not expressly amended herein shall remain in full force and effect.
4. **Authorization:** The City Manager is hereby authorized and directed to take all necessary actions and execute any and all documents, including a formal Lease Amendment, to implement this Resolution.

INTRODUCED, READ, AND ADOPTED THIS [Day] DAY OF [Month], 2025, BY THE CITY COUNCIL OF THE CITY OF LOUISVILLE, COLORADO.

CITY OF LOUISVILLE, COLORADO

By: _____
Dennis Maloney
Mayor

ATTEST:

By: _____
Genny Kline
City Clerk

From: [Tawnya Somauroo](#)
To: [City Council](#)
Subject: Please don't forget HB25-1182 in the 2026 Legislative Agenda
Date: Thursday, December 11, 2025 9:51:23 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor and Members of City Council,

Thank you for publishing the City of Louisville's draft 2026 Legislative Agenda and for clearly affirming the City's commitment to insurance reform that helps residents prepare for and recover from climate-driven disasters.

I am writing to respectfully request that the City explicitly add support for state regulations that implement insurance discounts for verified community-level wildfire mitigation, as authorized by House Bill 25-1182 (sponsored by Representative Kyle Brown and others).

As you know, the draft agenda already supports reforms that:

- Reduce system-wide underinsurance,
- Improve transparency in coverage gaps,
- Address insurance availability and affordability, and
- Ensure premiums are tied more directly to actual risk and losses.

Supporting community-level mitigation insurance discounts directly advances each of these goals.

HB25-1182 requires insurers using wildfire risk models to account for community-level mitigation actions, such as fuel treatments, wildfire risk assessments, and government-led mitigation investments, or to provide discounts when those actions are not incorporated into their models. The bill also directs the Division of Insurance to adopt rules to implement these requirements.

For communities like Louisville, which has invested heavily in wildfire mitigation, risk assessment, and public education following the Marshall Fire, proper implementation of this law is essential. Without clear regulatory standards:

- Community investments in Open Space mitigation and neighborhood mitigation may not be recognized by insurers,
- Residents may continue to pay premiums that do not reflect reduced risk, and
- A growing disconnect may persist between local mitigation efforts and insurance affordability and availability.

Adding a specific legislative priority supporting an additional rulemaking to create regulations facilitating the bill's requirement that insurers to recognize and provide premium credit for verified community-level mitigation would:

- Reduce underinsurance by making coverage more affordable,
- Improve transparency by clarifying how community mitigation affects premiums and underwriting,
- Ensure that public investments in wildfire resilience deliver tangible benefits to residents.

I respectfully suggest language such as:

“Support regulatory implementation of HB25-1182 to ensure property insurers provide meaningful premium discounts or rate recognition for verified community-level wildfire mitigation actions, as authorized under the Bill.”

Including this priority would position Louisville as a leader in aligning climate resilience, insurance reform, and maintaining affordability while ensuring that the City’s significant mitigation efforts are fully recognized in the insurance marketplace.

Thank you for your consideration.

Regards,

Tawnya Somauroo

From: [Lisa Hughes](#)
To: [City Council](#); [Diana Langley](#); [Judi Kern](#); [Jennifer Henderson](#); [John Willson](#)
Subject: Comments regarding Wildfire and Home Hardening Code
Date: Sunday, December 14, 2025 3:38:54 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Councilmembers, Mayor Leh, and City Manager Langley,
Here are my comments about the presentation regarding the wui code and home hardening code amendments being discussed at the 12/16/25 Council meeting which I may not be able to attend.

With regards to the adoption of a Wildland Urban Interface(WUI) code for Louisville, Director Zucarro mentions that Louisville's code could consider several tiers depending on fire risk level. I think this is the appropriate route for Louisville- to develop code that is specific to certain parts of the City- ie the Western side of the city, neighborhoods abutting N open space and Davidson Mesa, as well as Marshall fire impacted areas could have higher standards than other parts of the city. These levels should be determined. however, based on the WCRA assessment that will be provided from LFPD early next year, and not based on the initial map created by the Colorado State Forest Service. I support adding the suggestions to the code that Director Zuccaro suggests.

I encourage the Council to advise adoption of a map specific to Louisville, and only use the CWRC map provided as a starting point. The map was developed by the Colorado State Forest Service, and does not include any areas of the city impacted by the Marshall fire in any risk level. This is contrary to other maps, assessments that rank those areas as moderate or high risk. For example, I recently received a postcard from Xcel Energy stating that my house was in a moderate to high fire zone and I should prepare accordingly. Insurance rates in this area also indicate that insurers are considering it higher risk. Therefore, Louisville should develop a map that includes at minimum, the Enclave, Hillside, Centennial 8, Cornerstone, Cherrywood and others.. The current map only shows moderate fire risk coming up to Davidson Mesa, but not the houses right next to it, even though houses in Spanish Hills and Panorama that also abut the Mesa are included but are in unincorporated Boulder County which has much more stringent standards.

The preliminary maps that have been provided by the WCRA assessment from LFPD show significant change when defensible space is added and ongoing mitigation is done. Many neighborhoods go from red or yellow to blue, including my neighborhood, Cornerstone, that burned in the fire. Therefore, **I support adding defensible space to the current home hardening code.** Numerous studies, most notably from IBHS, have shown that defensible space can stop fire and allow homes to survive especially in the 0-5 ft zone. Defensible space allows for trees, bushes, etc- preferably local and native, just not in the first five feet. Defensible space is important not only at the individual level, but also at the community level. Research from IBHS and others has shown that when communities have defensible space on multiple properties, fire risk is reduced, and homes are more likely to survive. Along with home hardening, on multiple properties, this can greatly enhance Louisville's chance of surviving another urban conflagration as well as allowing the community to continue to be able to access and afford homeowners insurance.. I do support plants from the low flammability plant list mentioned for Class 1, but to really be effective, there should be no plants in the 0-5 foot zone.

Currently, the hardening code is only for new development, or significant remodels. I don't understand how adding a defensible space requirement to this code would make the whole City subject to Class 1 regulations, as Director Zuccaro suggests. It seems like it would only apply to the same as the current code.

Ultimately, I would like to see defensible space as well as fire safe landscaping be required City wide, but

that is a big ask at this point. Additionally, I think this would require significant education to residents, and to *landscaping companies especially*. Also, to ensure compliance the city would likely need to apply for grants or something else to offer monetary incentives for compliance, beyond the \$500 currently offered by Wildfire Partners. The City of Boulder currently offers \$2000 which is much more incentivizing, but they passed a tax to do it.

With regards to compliance and enforcement, I don't think adding a defensible space requirement to the current code would be that difficult as it is often landscapers putting in fences that have to comply, and defensible space could be checked with fence compliance. Also, if the City would stop allowing residents in the building process to landscape prior to receiving a COO, then this would be much easier to enforce, and could be discussed at the final grading inspection.

The Louisville Neighborhood Resilience Coalition has done extensive research in this area, and I would be happy to share our findings with Council.

The biggest question it seems Council needs to address is to what areas of the City will the WUI code apply or will it be City wide? As stated above, I think a tiered approach is the best for this, but until the results of the WCRA have been shared city wide and residents have a chance to see it and provide feedback, I don't think any decisions should be made.

Sincerely,
Lisa Hughes
Louisville resident, Cornerstone neighborhood Firewise co- lead
Louisville Neighborhood Resilience Coalition member

From: [Ann](#)
To: [Christopher Leh](#); [City Council](#); [Diana Langley](#); [Rob Zuccaro](#); [Chad Root](#)
Subject: Input on City's potential WUI designations and defensible space regulations
Date: Sunday, December 14, 2025 8:23:51 PM

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Mayor Leh, City Council Members, City Manager Langley, Community Development Director Zuccaro, and Chief Building Official Root:

I will not be able to attend the discussion on 12/16/25 about the WUI and Defensible Space designations, but have feedback about the questions being discussed.

Multiple state-wide public commenters on the WRCB process expressed disagreement with the way the new statewide WUI map omits urban areas. We have seen across the state that wildfires from traditional WUI areas have blown into urban and dense suburban areas. The underlying data and maps from the state Wildfire Risk Viewer did show risk areas within Louisville, for example, but the **final WRCB map was "smoothed, filtered, and aggregated" and those areas were dropped from the final map.** This is a major flaw. Why would we have a map that has dropped consideration of the risk of wildfire in pockets within the City as determined by the state?

I understand this is a discussion about WUI, not urban conflagration, but that distinction didn't mean much on 12/30/21. The Marshall Fire was not an urban conflagration started by a chimney fire, **it was an urban conflagration started by a wildfire.** They should not be separated in our response. Several fire fighters on the Marshall Fire stated that they were preparing themselves for the entire City of Louisville to be destroyed the way the wind was blowing that day.

The public has not seen the analysis and maps from the LFPD WRA, which should inform this discussion. Until we see that, I urge the Council to direct staff to develop a **more comprehensive approach to ember and wildfire resistance across the entire City.** At the very least, WUI areas should be defined to include all naturalized open space and park lands--not just on the west side--and developed areas that are adjacent. This would address the WRCB requirement to define WUI as the, "... geographic area where structures and other human development meets **or intermingles with wildland or vegetative fuels**".

The City's Home Hardening Code should be amended to require vegetation-free Home Ignition Zones (HIZ) within 0-5 feet of all buildings. With this applying to remodels and new homes, it would begin to create pockets within the City where embers or conflagrations could be halted.

The City could also take a stronger approach to **encouraging everyone to work towards vegetation-free HIZs** through neighborhood-focused education, incentives, perhaps grants, etc. We also have not seen results from the ForsMarsh education project. This project was originally framed as a city-wide education initiative, although recently we've heard it may have been redirected toward communication to support the

new Hardening Code specifically.

Finally, the WUI map and any regulations that follow should also form the basis for **management of City-owned open space, parks, and landscapes**. It is not justifiable that the state's determination that open space areas within the City present wildfire risk is being ignored in the WRCB map being proposed for City adoption.

I appreciate your consideration of the safety and economic vitality of our community by helping us increase our resilience to climate-enhanced disasters.

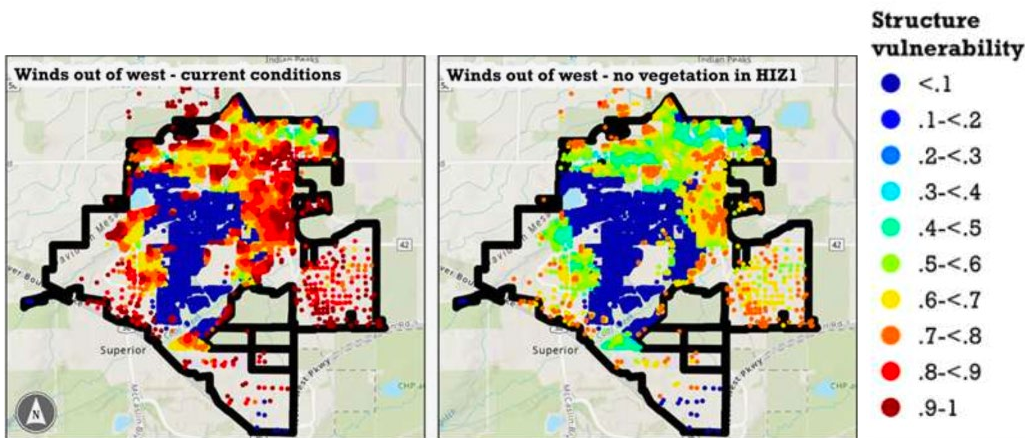
Ann Brennan
888 Larkspur Court

From: [Tawnya Somauroo](#)
To: [City Council](#)
Subject: WCRA Findings Support Interim Defensible Space Ordinance
Date: Monday, December 15, 2025 8:37:58 AM
Attachments: [PastedGraphic-1.png](#)
[PastedGraphic-2.png](#)

[EXTERNAL EMAIL] From outside of City of Louisville DO NOT CLICK links or attachments unless you validate the sender and know the content is safe.

Dear Mayor and Council,

The preliminary WCRA maps included in this week's Council packet are sobering. According to these conflagration models, it is not possible to substantially reduce structure vulnerability across wide swaths of Louisville without adopting 0-5 ft Immediate Zone defensible space around buildings.



In view of these preliminary model results, I request that Council adopt a city-wide interim ordinance establishing Immediate Zone (0–5 feet from structures) defensible space and a ban on juniper plantings for *new landscaping only*, until Council is able to take up wildfire mitigation comprehensively following completion of the Louisville Fire Protection District's Wildfire and Conflagration Risk Assessment (WCRA).

The City has signaled support for anti-conflagration policies, but from what I understand, it might take another year to return to the subject of city-wide defensible space code. An interim emergency ordinance is therefore necessary to prevent additional high-risk fuels from being added to neighborhoods around the City, especially in our Marshall Fire rebuilt neighborhoods. An interim emergency ordinance requiring defensible space for new landscaping would allow the City to take the time it needs to work on its broader fire risk reduction policy work.

It costs nothing to comply with defensible space when installing new landscaping, it only requires that the Immediate Zone be left unplanted and/or safer plants be selected, a long recognized best practice in wildfire-resilient communities. This request does **NOT**:

Require retrofits of existing landscaping,

- Impose new costs on current residents, or
- Resolve the full scope of wildfire mitigation policy immediately.

In my own neighborhood Cornerstone, so many of my neighbors created defensible space when they rebuilt their homes with fire risk front of mind. My neighbors organized to get a Firesafe designation because we experienced a traumatic event in our neighborhood and wanted to reduce the future risk of a similar fire disaster.

But my neighbors are struggling to keep our fire risk down because investor builders of McMansions are building 30% of my neighborhood, and they do not care about our Firewise status. Planting fuels within 5 feet of a home not only increases danger to an individual property, but also to adjacent homes owned by other residents. It is telling that ALL of the junipers planted in my neighborhood have been planted by investors, who look for cheap, quick growing trees to plant. Two of the investor homes include over 15 junipers. The preliminary WCRA maps make it clear that allowing profit-seeking builders to introduce known hazards in my neighborhood effectively opts-out fire survivor decisions to build a safer environment.

(For an illustration of why junipers are a unique conflagration risk, see this video of a cypress ignited by a firework on a calm day which quickly caused the total loss of a home. We may not have cypresses in Louisville, but junipers burn the same way - fast, hot, and with intense flames).

We need code because investors tend to plant high-risk landscaping wherever they go, taking their profits and leaving the risk behind for residents to bear. I am not asking Council to legislate legacy conditions, I am asking Council to prevent new, completely avoidable fire risks from being added to Louisville neighborhoods. With the Comp plan and code updates in the works, the City will almost certainly take at least five years (or maybe more) post-fire to discuss the science-based recommendations provided by multiple expert reports years prior.

An emergency ordinance is appropriate here because they are designed to:

- Prevent foreseeable harm,
- Preserve future policy options, and
- Protect residents while longer-term solutions are developed.

Asking residents to sit quietly and accept additional high hazard landscaping to be planted in their neighborhoods in view of the clear risks illustrated in the WCRA while the city takes years to make policy is neither reasonable nor just. I respectfully ask Council to adopt an emergency ordinance immediately establishing defensible space and prohibiting junipers from new landscaping. The issue can be revisited comprehensively after the WCRA is complete.

Thank you in advance for your willingness to commit to keeping Louisville's neighborhoods safe.

Regards,
Tawnya Somauroo
Cornerstone resident