

From: tclark@factpoint.com
To: [Town Center](#)
Cc: [Adrienne Smith](#)
Subject: Planning Commission [DO NOT EDIT SUBJECT]
Date: Sunday, March 24, 2024 8:06:32 PM

RE: draft PV zoning code

Planning Commissioners and Architectural and Site Control Commissioners,
I am Tim Clark, a member of Ladera Community Church who has been involved for nearly five years in our efforts to put affordable housing on the undeveloped half acre adjacent to the church in the Town of Portola Valley. The parcel is a separate lot from the church property and the ADU that is nearing completion on the main property, both of which lie in San Mateo County's jurisdiction.

I have reviewed the draft zoning code released last week and heard the Planning Commission's March 20 discussion on Zoom. As a nonprofessional, let me raise a couple of questions concerning the ordinance, specifically the RM-F zoning that is applied to our parcel, the only parcel in town given that designation:

1. Our prospective partner, Habitat for Humanity Greater San Francisco, sometimes uses modular homes built off-site for small projects like ours. How would the proposed zoning regulations apply to such buildings? They have clear advantages in terms of cost—important for affordable housing—and reduced disruption of the church, tenants and neighbors from a shorter construction time.
2. Under building materials and colors, I do not see wood included as a primary building material. Is it banned or must the façade be of one of the listed materials (stucco, stone, stone-colored brick, EIFS and fiber cement)?

We appreciate your consideration,

Tim

--

Tim Clark
Affordable Housing Task Force
Ladera Community Church
tclark@factpoint.com
650 208 6997

From: [Bill Russell](#)
To: [Adrienne Smith](#)
Subject: April 3 Joint Meeting of the Planning Commission and ASCC
Date: Sunday, March 31, 2024 5:25:01 PM

My wife and I live at 200 Nathhorst Avenue, Portola Valley. We have been residents of Portola Valley for approximately 35 years. Our home is one of approximately 28 homes in the Nathhorst Triangle/Applewood Neighborhood.

The comments below relate to the possible future development of the undeveloped rear portion of 4370 Alpine Road consisting of approximately .88 acres and how that possible development is affected by the draft modifications to Title 18 of the PV Municipal Code developed by Lise Wise Consulting March 2024 and by the comments from ASCC attached to the April 3 agenda.

History: 4370 Alpine Road consists of a single parcel with the front part devoted to offices and the rear part (.88 acres) containing two dilapidated, unused tennis courts. 4370 is immediately adjacent to the Nathhorst/Applewood neighborhood which consists solely of single family residences on minimum one acre sites.

The State of California mandate for affordable housing resulted in substantial discussions between the owner of 4370 Alpine, the residents of the Nathhorst Triangle/Applewood Neighborhood, Cara Silver (former PV town attorney) and the PV Planning Commission regarding the future development of the .88 acres at the rear of 4370. From discussions that we have had, we believe that the preference of the homeowners is for the .88 acres to be devoted to residential housing, preferably a small number of single family residences, perhaps 2 to 3 in number. After much discussion, an agreement was reached, which agreement is embodied in the Housing Element and in the proposed Zoning Code, Chapter 18.23 which chapter makes specific reference to and incorporates applicable provisions of the Housing Element, (these are described on pages 131 and 132 of the Housing Element approved by HCD January 30, 2024). The agreement between all parties can be summarized as follows:

1. 4370 Alpine will be zoned Mixed-Use.
2. Five units will be permitted on the .88 acres, two in the front along Nathhorst, and three in the back.
3. Front setback from Nathhorst Avenue shall be 30 feet; side and rear setbacks shall be 25 feet.
4. Units fronting Nathhorst Avenue shall be one story.
5. Setback from the creeks shall be determined by an individualized engineering study but in no event less than 10 feet.
6. To the extent feasible, parking spaces shall be located in the interior on the site so that they are not visible from the street.

The ASCC comments recently presented to the planning commission for consideration reference a zoning category described as "R-MU." However, the zoning ordinances

themselves do not reference such a category, at least not one that we were able to locate. The "R-MU" provisions are substantially different than the provisions of Chapter 18.23 governing the development of 4370 Alpine.

The purpose of this comment is to ensure that all of the provisions currently set forth in the draft of 18.23 and the Housing Element itself as they relate to 4370 Alpine be contained in the final version of the zoning ordinances and not be altered by "R-MU" or any other provisions.

As some of you may know, the architect for the owner of 4370 Alpine recently submitted a housing concept drawing that accompanied a possible four lot subdivision/lot split. The contemplated houses referenced in the drawing did not comply with some of the constraints set forth in Chapter 18.23 and the Housing Element. Recently, I was advised that the owner of 4370 has asked that the town no longer consider his proposal.

The architect for 4370 is also a co-chairman of ASCC. I understand that the planning commission is addressing this potential conflict of interest in some fashion. Regardless of the outcome of that discussion I do believe that the homeowners in the Nathhorst/Applewood Neighborhood are willing to have a constructive dialogue with the owner of 4370 Alpine when he decides what he would like to do with his property.

Thanks for considering these comments.

Bill and Caryl Russell

My wife and I are 35 year residents of Portola Valley. This is our second comment to the April 3, agenda. The first is dated March 31, 2024. Please read that comment first and then, after reading this one, you'll understand just how naive we really are.

All of the comments below relate primarily to the potential development of 4370 Alpine Road and tangentially to the other mixed use properties in Portola Valley.

1. All 28 single family residences in the Nathhorst/Applewood Neighborhood are on a minimum one acre site.
2. The property at 4370 consists of an office complex behind which sit two dilapidated, unused tennis courts. The entire parcel itself is approximately 2.45 acres with .88 of those acres in the back where the tennis courts are located. Those .88 acres, and to a lesser extent the office complex, are part and parcel of the Nathhorst/Applewood Neighborhood. There are multiple homes across the street, to the side, and partially to the rear of the .88 acres. It is not an exaggeration to say that the .88 acres represents the gateway/entrance to the neighborhood.
3. All of the neighbors with whom we have spoken over the past year are strongly in favor of residential development of the .88 acres and not mixed use, with the preference being one single family residence on the .88 acres (as a concession because all of the rest of the homes occupy a minimum one acre lot).
4. Against this backdrop the State of California mandated the development of affordable housing throughout the state. Negotiations commenced: the owner of 4370 initially suggested building 11 units on the .88 acre rear portion of the property (nine three bedroom units of 1,782 square feet and two ADUs of 582 square feet each); the residents pushed back and the owner of 4370 Alpine reduced his proposal to six units; the neighbors wanted four and an agreement was ultimately reached for five units. The negotiations took a full year. The active participants throughout the process were the residents of the Nathhorst/Applewood Neighborhood, the owner of 4370 Alpine, his architect Carter Ware, town planner Laura Russell, and town attorney Cara Silver. A contract was entered into for the future potential development of the .88 acres. The terms of that contract are set forth in the Housing Element, as follows:
 - A. The property at 4370 Alpine was to retain its then existing AP zoning (meaning no lot splits or subdivision into separate lots). Instead, the 2.45 acre parcel would remain one parcel with four housing units in the front and five on the back .88 acres. Throughout this process, at no time was it ever suggested that there be a lot split of the .88 acres let alone any agreement to do so.
 - B. The five housing units on the .88 acres would be part of a condominium/townhome association with management by an HOA.
 - C. The five housing units would consist of two fronting Nathhorst and three on the rear of the parcel.
 - D. The housing units fronting Nathhorst would be one story and those to the rear of the parcel, two story, if the owner of the property wished.
 - E. The front setback would be 30 feet, with 25 foot side and rear set-backs.

F. To the extent feasible, as determined by the Planning and Building Director, the parking spaces shall be located in the interior on the site so that they are not visible from the street.

G. Five guest parking spaces shall be provided on the rear portion the property or though a permanent shared parking arrangement with the front portion of the site.

5. All that remained to be done was to implement this agreement through zoning ordinances. The March 2024 Title I8 proposed draft zoning code amendments prepared by Lise Wise Consulting, Inc does exactly that, providing for all of the contract provisions outlined in the Housing Element and described above.

WHAT HAPPENED NEXT?

1. The owner of 4370 decided that he did not want to develop the property in accordance with the agreement set forth in the Housing Element. Instead, he proposed that there be a four lot subdivision/lot split with three of the lots located on the .88 acres. His architect, Carter Ware, prepared an unofficial draft site plan for the proposed development. I am told that no formal subdivision application was ever submitted to the town.

2. Regardless, from the unofficial site plan, it became clear that the proposed subdivision was in direct violation of the parties' Agreement set forth in the Housing Element, in the following respects:

A. The Agreement contemplated no subdivision or lot split, simply an agreement for 9 total units on the single lot with four in the front and five in the back whereas the site plan contemplates an actual subdivision with four individual lots (three in the back and one in the front where the offices are currently located)

B. The Agreement contemplated a condominium style development on the .88 acres governed by a homeowners' association and not a single family residential development that would permit the construction of three single family residences, none of which complies with the one acre minimum requirement for single family residences in the Nathhorst/Applewood Neighborhood. Instead, according to the site plan, one of the proposed home sites is to be on .308 acres, another on .313 acres, and the third one on .260 acres.

C. The Agreement specifically stated that any structures that fronted Nathhorst Avenue would be single story. The site plan proposed that fronting Nathhorst on each lot would be a garage with an ADU above the garage (e.g. two stories fronting Nathhorst).

D. The Agreement specifically states that the front setback from Nathhorst will be 30 feet. The site plan proposes a 20 foot set back.

E. The Agreement specifically states that the rear setback and side setbacks will be 25 feet. The site plan proposes a rear set back of 20 feet and a side setback of 5 feet.

3. The site plan was never circulated to the neighbors in the Nathhorst Triangle/Applewood Neighborhood but a copy was provided to me and to Bob Adams.

4. Within a few days of Bob Adams and I receiving a copy of the site plan, we learned that Carter Ware and/or the owner of 4370 had instructed the town to take no further action with respect to the proposal contained in the site plan.

5. There was never any explanation provided as to why this was done. Perhaps, the owner of 4370 believed that the residents of Nathhorst Triangle/Applewood were not going to approve of his planned subdivision. I just don't know.

AND THEN WHAT HAPPENED?

1. Nothing.

2. My wife and I received a copy of the April 3, 2024 planning commission agenda and read it. My expectation was that Lise Wise's draft zoning code amendments would be adopted at the meeting and that, if at some future date, the owner of 4370 Alpine submitted an application for a subdivision there would be ample time for discussion and debate.

3. The April 3, 2024 agenda includes the ASCC Comments to the agenda. Some good points were raised. And then I came across a passage that completely mystified me. This is what it says:

"R-MU

Unit density: 6 units/acre minimum 3 units/acre

Minimum lot size : 14,500 square feet

Floor Area Ratio (FAR): .25 or 25% of lot area

Coverage area ratio: .18 or 18% of lot area

FAR and CAR bonus for 1 story 10% increase above regular limits

Building floor area limit 7,500 square feet

Landscape Area Ratio (LAR): .40 or 40% of lot area

Impervious Surface Ratio (IAR): .50 or 50% of lot area

Front Setbacks: 30 feet unless special setbacks prevail

Side Setbacks: 15 feet between buildings or 15 feet from property line

Rear Setbacks: 25 feet

Building separation 15 feet-2 story, and 7.5 feet-1 story

Building Height: 28 feet vertical and 34 feet lowest to highest. "

4. As you can see from my first comment to the Agenda dated March 31, 2024 it was not clear to my wife and me whether this was an attempt to alter the draft zoning code amendments prepared by Lise Wise as they related to the property at 4370 Alpine. We now believe that it is exactly that. The ASCC proposal provides for an automatic right to subdivide without the constraints of having to submit a subdivision application and giving the property owners affected the right to comment and/or object. This would avoid the need for presentation of a

site plan and analysis by affected homeowners. And the proposal itself is difficult to understand and inconsistent with the Housing Element and contrary to the parties' Agreement:

A. What is actually meant by the phrase " Unit Density: 6 units/acre/minimum 3 units/acre." Does this mean that whenever there is a one acre parcel, the owner always has the right to construct six units on an acre? Does it mean that if there is one acre the minimum allowed is three units???

B. Minimum lot size 14,500 square feet. The back section of 4370 Alpine is .88 acres. It would be a very easy task to ask for a lot line adjustment to move the lot line across the creek to the side where the offices are located, thus increasing the .88 acres to one acre. Since there are 43,560 square feet to an acre and if the minimum lot size is 14,500 square feet this would then permit there to be three lots on the back portion of 4370 Alpine (43,650/14,500). If the FAR is .25 then this means that each house could be 3,625 square feet (not counting ADUs). That's 3,625 square feet in a neighborhood where one is limited to approximately 4,000 square feet (more or less) on one full acre.

C. Front Setbacks: " 30 feet unless special setbacks prevail." What does this even mean "unless special setbacks prevail?"

D. Side Setbacks: " 15 feet between buildings or 15 feet from property line." Does this mean that if there is 15 feet between buildings there does not have to be any setback from the side property line? Builder's choice as to which of two options is elected?

Missing from 'R-MU" are all of the special provisions set forth in the Housing Element applicable to 4370 including a mandate that any structures fronting on Nathhorst must be single story.

Perhaps, most importantly, how did this "R-MU" proposal come about? Who are its advocates and what are their interests?

5. This proposal for "R-MU" needs to be rejected for multiple reasons:

A. An enforceable contract exists between the homeowners in the Nathhorst/Applewood Subdivision and the owner of 4370 as set forth in the Wise draft zoning ordinances and the housing element. This contract defines what can and cannot be constructed on 4370 should the owner make the decision to develop his parcel. The contract was approved by the planning commission, then the town council, and then the State of California when it certified the Housing Element. Like any contract, it is binding on the parties and cannot be modified without the consent of the parties and cannot be modified unilaterally by the planning commission or the town council. And, at least one person believes that the town's housing element, once approved by the state, created a contract between the state and the town. In a recent Mercury News Article, Jeremy Levine, policy manager for the Housing Leadership Council of San Mateo County, is quoted as saying "Portola Valley made a contract with the state they have to follow through on, That's what cities should keep in mind—if you make a promise, you have to keep it." Most importantly, the proposal for "R-MU" runs directly contrary to the parties' agreement with respect to 4370 and must be rejected. The opinion of the town attorney on this would be most welcome.

B. Even if the town attorney were to determine that the town council now had the authority to change or reject the contract between the parties and the contract between the town and the

state, due process mandates that this cannot be done without giving specific personalized notice to all of the residents of the Nathhorst Triangle/Applewood Neighborhood who are parties to or beneficiaries of this third party contract so that they may provide comment and input.

C. The terms of the contract were approved by the planning commission, then the town council and then submitted to the state as part of the Housing Element. The State of California approved the contract when it certified the Housing Element. The State of California approved the Housing Element on the basis that there would be five potentially affordable housing units as part of a condominium/townhouse association or PUD on the .88 acres of 4370 Alpine. If the zoning is now changed to allow an automatic three lot subdivision with unaffordable 3,500 square foot homes on 14,500 square foot lots then when the State of California discovers that the town is not implementing through zoning the housing set forth in the Housing Element the state will reject the Housing Element and we will all return to square one.

We believe that it is quite possible to reach an agreement with the owner of 4370 Alpine that satisfies the neighborhood and the owner's development wishes. However, the way to achieve that goal is not to (1) present a site plan that is directly contrary to everything agreed to and imbedded in the Housing Element and is not (2) to make wholesale changes to the Mixed Use Zoning which are contrary to the parties' Agreement. The best way to proceed is to adopt the zoning ordinance as drafted by Ms. Wise and when and if any formal subdivision application is presented by the owner of 4370 or any other mixed-use property owner, to open a dialogue with all concerned.

CONFLICT OF INTEREST

The April 3 agenda contains the following statement:

"Meeting Format, Planning Commission/ASCC clarifying questions of staff—due to existing conflicts amongst a planning commissioner and ASCC Commissioner suggest only questions related to the proposed multi-family standards and all other parts of the draft code, excluding mixed use standards. Conflicted Commissioners may leave the schoolhouse and remaining commissioners may pose questions."

The April 3 agenda does not identify the parties to the conflict or the nature of the conflict. Presumably, it is the fact that Carter Ware is the ASCC Commissioner and also represents the owner of 4370 Alpine and, perhaps, the owner of one of the other mixed-use parcels in town. If this is the case then the remedy is not to simply disallow participation in a dialogue. To the extent that there was any participation by Mr. Ware in the drafting of the ASCC comments to the proposed zoning then those draft comments must be excluded from the commentary and not considered by the planning commission. And then what do we do if the other members of the ASCC were aware of this conflict and did nothing to recuse or excuse Mr. Ware from participation. That, I leave to the town attorney.

Thanks for considering these comments.

Bill and Caryl Russell

Dear Chair Goulden and Portola Valley Planning Commissioners,

We understand that the Planning Commission is primarily considering zoning amendments at this week's meeting. But following up on our previous letter to the Planning Commission submitted prior to the March 20th meeting, we are writing today to again express our deep concern about the Town's approach to the Opt-In Program. As you know, the Planning Commission did not have a chance to provide input before the Opt-In Program was hastily converted by the Planning Department and Town Council from a pilot program to a much broader program that will significantly impact our Town's larger parcels.

We also understand the difficult position the Town Council and Planning Department were put in due to the state's Housing Element certification deadline. The Council was in a rush and was basically forced to approve the Housing Element under immense pressure from the state and only did so by a 3-2 vote. Since HCD has already taken the extreme step of decertifying the Town's Housing Element, this body now has the opportunity to provide meaningful recommendations to the Town Council regarding the Opt-In pilot program. Time is still of the essence, however, and we urge you to help the community right the wrong that happened at the January Town Council meeting.

With that in mind, we broadly ask that the Planning Commission, Planning Department, and, in turn, the Town Council use this decertification to the Town's advantage. In the Town's resubmittal to HCD, the Housing Element should be revised to change the Opt-In program back to a pilot program as originally supported by the Portola Valley community. More specifically, we urge the Planning Commission as soon as possible to recommend that the Planning Department and Town Council revise the site inventory to include the number of units the state requires without making all Opt-In parcels eligible for up to six units per acre with only ministerial approval. The Town still has a path to meet the state requirements for Housing Element certification without taking this unnecessary step regarding the Opt-In Program.

To be clear, the Opt-In Program should without question remain a pilot program for a small number of identified parcels in town, with the potential for future, carefully vetted expansion. Should additional units be required for the Housing Element to pass HCD muster in this cycle, we strongly advocate, with broad support from the Portola Valley community, to identify other potential units on different parcels, including any Town-owned parcels, to pair with the Opt-In pilot program. With this approach, the Town can still meet the Town's housing goals and satisfy the state's requirements.

In short, HCD's decertification provides a unique opportunity for the Town and more specifically the Planning Commission to quickly come up with a plan that increases housing units while at the same time protecting our Town from dramatic, unnecessary change that the citizens of this community do not support. The time is now to alert the Town Council and Planning Department that in addition to considering the rezoning before the Commission this week, they must also revise the Housing Element by changing the Opt-In Program from a requirement back to a pilot program as the community intended. It is our sincere hope that the Town Council, with more time and another chance to do the right thing, will step up here to defend the Town's interests in the face of unrelenting state pressure.

Sincerely,

Clair and John Jernick
33 Grove Drive

Cc: Mayor Sarah Wernikoff, Vice-Mayor Judith Hasko, and Town Council Members Jeff Aalfs, Mary Hufty, and Craig Taylor; Town Manager Sharif Etman, Interim Planning and Building Director Jon Biggs

April 3, 2024

Dear Planning Staff, Planning Commission and ASCC -

Thank you for taking the time to thoroughly analyze our Zoning Amendments. While I realize the Town of Portola Valley is under immense pressure to complete this rezoning, I fully support the Planning Commission's decision to involve the ASCC and gather more resident feedback prior to making a recommendation to the Town Council. I also agree that the WFPD be involved in this process. We need the input from residents and experts who know the history, culture, and nuances of our Town to make these impactful decisions. Let's keep Portola Valley as true to our General Plan as we possibly can.

Safety should be at the top of our decision-making process. I am in support of the ASCC's recommendations, and view these as key issues:

- Lowering the building height and allowing better access for our fire trucks is imperative.
- We have learned that building separation plays an important role in limiting fire risk, and we know that insurance companies are using a density factor in their modeling. Please revisit the building separation of 12 feet for the RF-MF-23 Zone. Experts recommend at least 20 feet.
- We must limit on-street parking, as many neighborhoods have narrow streets and limited access. As Alpine and Portola Roads are evacuation routes, we must ensure that those roads are ALWAYS clear.

We must protect our Open Space from future development. The Planning Commission discussed the Frog Pond at its last meeting, but given we are amending our Zoning map, let's do it completely, and include our dedicated Open Space areas. While we're at it, should we include our School District properties for complete clarity?

Here is a map of our Open Space, which can be found at:

<https://www.portolavalley.net/home/showdocument?id=2747>

Portola Valley's Open Spaces

Preserving the town's natural areas and pastoral lands

Spring Down Open Space

Size: 6 acres.
 Features: adjacent to Town Center; 0.3-mile loop trail around a meadow; a restored pond that attracts waterfowl and wildlife.
 Acquired through the Town's Open Space Fund.

Hayfields Private Open Space

Size: 52 acres.
 Features: redwoods, evergreen woodland, Bay views.
 Privately owned open space with agricultural and other rights reserved to the owner. An easement to the Town allows public use of a ~2-mile trail through a gift of the Targ and Kiesling families and support of Bill and Jean Lane.

Herb Dengler Open Space

Size: 11.8 acres.
 Features: shaded 1-mile loop trail through evergreen woodland, with Bay views.
 A gift of the Kersten Family.

Windy Hill Open Space Preserve

Size: 1,335 acres.
 Features: 13 miles of trails; grassland ridges, lush wooded ravines, and Bay views; picnic benches near Skyline Blvd.
 Midpeninsula Regional Open Space District lands.

Shady Trail Open Space

Size: 2.5 acres.
 Features: quiet, 0.8-mile Shady Trail along Westridge Creek; excellent for bird watching.
 Acquired by the Town through the generosity of Beverly and Peter Lipman, local neighbors and an Open Space Fund donation.

Dorothy Ford Park and Open Space

Size: 7.67 acres, including the baseball field.
 Features: 0.7-mile creekside trail and paved path, shaded by two magnificent Valley Oaks, used for walking, jogging, bicycling.
 Acquired by the Town and with a gift by Tom Ford in memory of his mother.

Triangle Park

Size: 0.62 acre.
 Features: lawn, picnic tables, and a bike repair station.
 Town Scenic Corridor and Greenway.

Hawthorns

Size: 78 acres (not open yet).
 Gifted to the Midpeninsula Regional Open Space District.

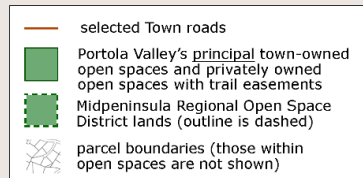
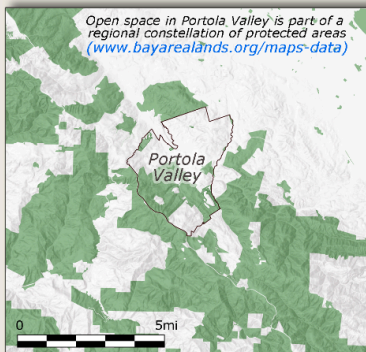
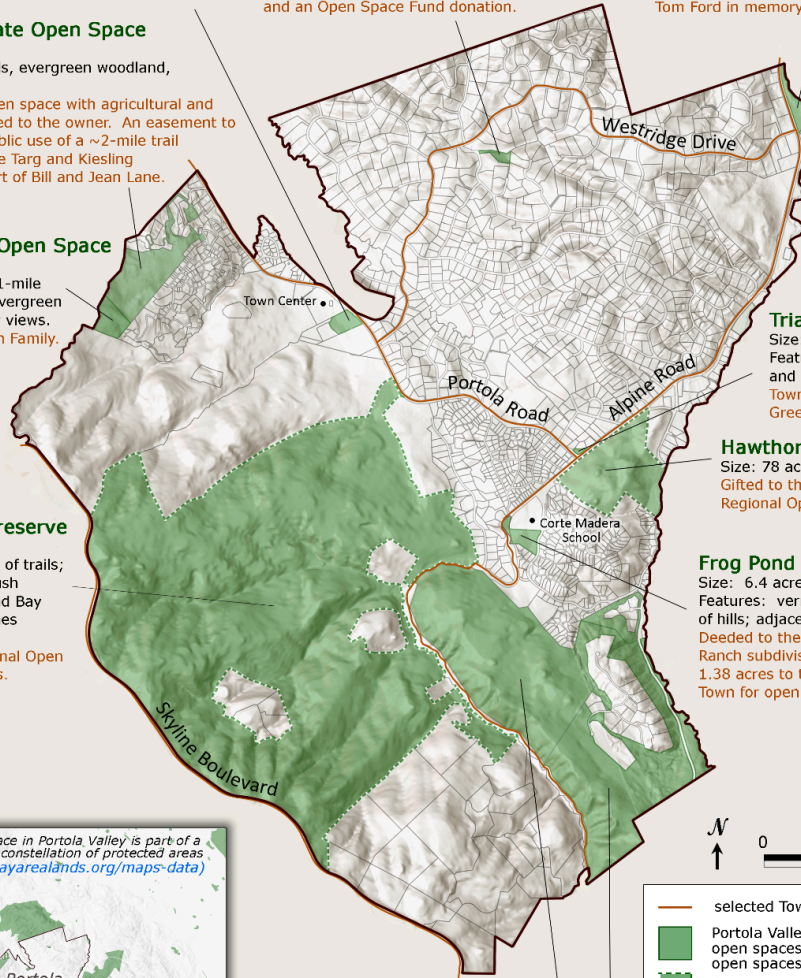
Frog Pond Open Space

Size: 6.4 acres.
 Features: vernal pond, grassland, views of hills; adjacent to Corte Madera School.
 Deeded to the Town by the Portola Valley Ranch subdivision, and contiguous with 1.38 acres to the west designated by the Town for open space purposes.

Coal Mine Ridge Open Space

Coal Mine Ridge Nature Preserve of Portola Valley Ranch
 Coal Mine Ridge Open Space of Blue Oaks

Size: 425+ acres across the two sub-units.
 Features: 10 miles of public trails with Bay views from grassy ridges; shaded walks in oak woodlands and chaparral canyons.
 Privately owned open space with easements to the Town allowing public use of trails.



The Portola Valley Open Space Acquisition Advisory Committee advises the Town Council on investing monies from the open space fund into open space projects. It also supports fundraising and fosters public awareness. To learn more about open space in Portola Valley, visit: www.portolavalley.net/about-portola-valley/open-space-in-portola-valley

June 2022

Thank you, again, for your willingness to serve our Town in such a caring and thoughtful manner. It is much appreciated!

Karen

To: Planning Commission and Architectural and Site Control Commission
From: Bob Turcott
Date: April 3, 2024

Re: Joint PC/ASCC meeting April 3, 2024, Agenda Item #1

Dear Commissioners:

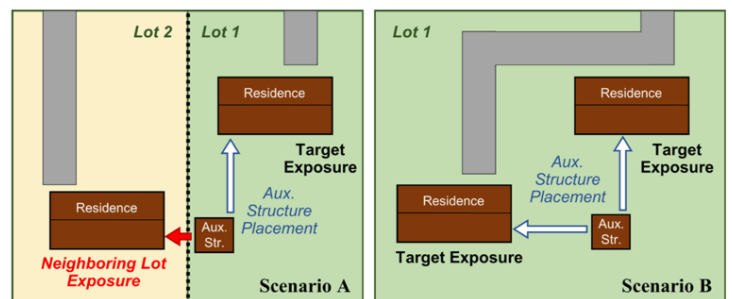
As we plan for a 20% population increase it is important to bear in mind just how fundamental and critically important adequate building separation is in reducing the risk of community-wide destruction.

All fire safety authorities - Cal Fire, National Fire Protection Association, Woodside Fire Protection District - recognize the threat of closely spaced, combustible structures and advocate adequate building separation.

- WFPD specifically called for adequate setbacks and building separation in its Jan 4, 2023 letter and March 29, 2023 comments.

- Noncombustible sheathing plays an important role in fire mitigation, but it can't protect against the sustained high-intensity radiant heat of a nearby burning structure. That's why NIST, Cal Fire, and IBHS **recommend adding noncombustible sheathing as retrofit when buildings are separated by 25-50', but NOT when they're separated by less than 25'**: the potential benefit is so insignificant that it doesn't warrant the cost. New wood-framed construction in hazardous areas should be separated by at least 25'.

- a 2000 sq ft *unfurnished* structure has the same amount of combustible fuel as native vegetation on 23 acres of land (Ray Moritz's data). Adding highly flammable synthetic furnishings and other possessions greatly increases the fuel load. *Wooden structures are literal fuel bombs.*



NIST Technical Note 2205
(SSD = Structure Separation Distance)

Sincerely,

Bob Turcott