



From: Planning Mail Box
Sent: Friday, January 9, 2026 3:10 PM
To: Nicole Morrow
Cc: Amanda Lee
Subject: FW: Comments on Draft Safety Element with Focus on Wildfire Risk

From: Janet Wilson <janet@silverhook.com>
Sent: Friday, January 9, 2026 12:56 PM
To: Planning Mail Box <Planning@delmar.ca.us>
Cc: Janet Wilson <janet@silverhook.com>
Subject: Comments on Draft Safety Element with Focus on Wildfire Risk

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Dear Planning Commission Members,

I have been reading the draft Safety Element and learning how the City anticipates hazards and prepares for disasters. The purpose of the Safety Element is to identify predictable hazards and reduce risk to people and property before disasters occur.

Seismic and geologic hazards: The Safety Element addresses seismic risk proactively by identifying fault zones, liquefaction, and slope instability, and by requiring investigation and mitigation based on predicted ground behavior, **even when structures appear sound and no earthquake has occurred.**

Bluff instability and coastal erosion: The Safety Element addresses bluff failure proactively by identifying erosion rates, slope instability, and setback risks, and by requiring buffers, monitoring, and mitigation before collapse occurs, **even when bluffs appear intact.**

Flooding: The Safety Element addresses flooding proactively through floodplain mapping, drainage constraints, and modeled flow paths, guiding mitigation for existing properties based on where flooding is expected to occur **rather than waiting for inundation or damage.**

Evacuation and emergency access: The Safety Element addresses evacuation proactively by identifying constrained routes, limited ingress and egress, and access limitations in advance, **rather than waiting for evacuation failure during an emergency.**

Climate change: The Safety Element addresses climate change proactively by planning for projected future conditions such as increased fire risk, sea level rise, and extreme weather, **rather than relying on past conditions or historical averages.**

Wildfire: The Safety Element addresses wildfire risk proactively by identifying hazardous fuel conditions, requiring defensible space, and ensuring clearance for emergency access, **rather than waiting for ignition or damage.**

I have become increasingly concerned about wildfire risk, particularly after the Palisades and Eaton wildfires destroyed thousands of homes just a year ago. With much of Del Mar now designated a Very High Fire Hazard Severity Zone, this is the right time to take action to reduce wildfire risk. In that context, this Safety Element is both timely and important.

The wildfire defensible space provisions in the Safety Element appropriately address hazards such as dry brush, weeds, dead vegetation, and emergency access clearance. However, the current focus is largely limited to dry or unmanaged fuel conditions.

Current California wildfire guidance defines defensible space as a buffer that reduces both surface and ladder fuels, and state fuel reduction programs explicitly include the reduction of vertical and continuous fuels, including live vegetation, as part of wildfire mitigation. The science of wildfire behavior shows that living vegetation arranged in certain ways can create ladder fuel conditions that carry fire from the ground into tree canopies and toward homes or evacuation routes. Dense vegetation interspersed with trees can form hazardous vertical fuel continuity even when the vegetation is living and well-maintained.

Clarifying that defensible space includes hazards created by vertical fuel continuity would strengthen the City's ability to act proactively and support consistent fire safety enforcement based on public safety outcomes rather than landscaping appearance.

I would like to recommend a small clarification in the wildfire section that defensible space includes vertical fuel continuity, so ladder fuel conditions are addressed in the same forward-looking manner as other hazards identified in the Safety Element.

Thank you for your time and for serving the Del Mar community.
Janet Wilson
Hoska Dr.

Nicole Morrow

From: Planning Mail Box

From: Janet Wilson <janet@silverhook.com>
Sent: Monday, January 12, 2026 2:46 PM
To: Planning Mail Box <Planning@delmar.ca.us>
Cc: JGrewal@delmar.ca.us; PPosner@delmar.ca.us; PLeonard@delmar.ca.us; MRittenbaum@delmar.ca.us; MSpieker@delmar.ca.us; Janet Wilson <janet@silverhook.com>
Subject: Re: Comments on Draft Safety Element with Focus on Wildfire Risk

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Dear Planning Commission,

Since my previous Red Dot submission, I have been researching how other cities address wildfire defensible zones in their Safety Element documents and have found that many jurisdictions already explicitly include live vegetation and ladder fuels within their defensible space and or vegetation management standards.

California guidance treats ladder fuels as part of defensible space. Cal Fire includes ladder fuels and fuel continuity among defensible space considerations, and the University of California Agriculture and Natural Resources recommends eliminating ladder fuels by disrupting vertical and horizontal fuel continuity through fire-safe landscaping.

It would be a straightforward modification to Del Mar's **Safety Element** to align with this established guidance. Attached is a draft showing how fuel ladders might be incorporated into **Section 7.4, Defensible Space and Fuel Reduction Program**. The suggested changes are shown in **green** for reference and reflect approaches used in other cities with Very High Fire Hazard Severity Zones.

Thank you for reviewing this information. I hope it is helpful as you continue your consideration of Del Mar's Safety Element.

Janet Wilson / Hoska Dr.

What are ladder fuels? A fuel ladder or ladder fuel is a Fire Service term for live or dead vegetation, debris, or combustible material that allows a fire to climb up from the ground level landscape or forest floor and into the tree canopy, up fences, and into homes and structures.

7.4 DEFENSIBLE SPACE AND FUEL REDUCTION PROGRAM

The Del Mar Fire Department, per Chapter 11.12 of the Del Mar Municipal Code and California Government Code Sections 51175-51189, conducts annual inspections to ensure residents in the Very High Fire Hazard Severity Zone (FHSZ) and the Wildland Urban Interface (WUI) maintain a 100 foot (100') defensible space around their home. Defensible spaces are a buffer between the structure and the surrounding areas that are free of fire hazards such as combustible vegetation and weeds. **Within Very High Fire Hazard Severity Zones, defensible space includes reducing hazardous horizontal and vertical fuel continuity, including ladder fuel conditions formed by living or dead vegetation, consistent with guidance from Cal Fire.**

Guidelines for maintaining a defensible space include:

- ▶ Removal of any dead or dying trees or shrubs.
- ▶ Maintenance of the first 100' feet around the house free of combustible vegetation and weeds.
- ▶ Maintenance of a minimum of 10' foot clearance from vegetation to chimneys.
- ▶ Maintenance of roof and rain gutters clear of any debris.
- ▶ Maintenance of a vertical height of 13'6" that is clear from the ground up for any trees that over-hang driveways or roadways.
- ▶ **Reduction of vegetation arrangements that create vertical fuel continuity between ground fuels, shrubs, trees, structures, or evacuation routes.**

As part of the City's Fuel Reduction Program, residents can request delivery of up to two free 3-yard green waste disposal bins to facilitate brush removal from residential properties. The program is advertised on the City website and weekly newsletters and aims to help vulnerable populations complete the brush removal needed for compliance with the defensible space requirement with minimal financial burden. **The program supports wildfire risk reduction by facilitating removal of vegetation that contributes to hazardous fuel continuity, including ladder fuel conditions.** During the 2024 program, 60 waste disposal bins were delivered to residents. EDCO collected a total of 30,880 pounds of green waste and brush were removed and 100% of the material was recycled.

Outside of the annual abatement inspections, residents throughout the city are required to comply with sections 11.12.010 and 11.13.040 of the Del Mar Municipal Code which outline a resident's obligation to maintain weeds and vegetation grown on private property. Weeds or vegetation growing adjacent to sidewalks, parking areas, alleys or streets are required to be maintained in a way that does not interfere with the use of public right-of-way and does not endanger the health or welfare of neighboring properties. Chapters 11.12 and 11.13 of the Del Mar Municipal Code describe the remedial process for addressing vegetation that is in violation of the City's code. The City is responsible for maintaining the same standard of maintenance for vegetation on public property.

There are no locations in the City of Del Mar that are subject to community fire breaks for defensible space. Crest Canyon is located outside of the Del Mar City limits and is managed by the City of San Diego. In accordance with the Coastal Act, fire breaks are not permitted in the protected habitat in this canyon, which is a Marine Protected Area (MAP) located in the coastal zone. The City of Del Mar's defensible space and fuel reduction program and plans for fire protection, fire hazard reduction, and emergency response are sufficient to protect development. Similar plans are in place within the City of San Diego to protect development in the adjacent area.