

# WUI VEGETATION CODE WORKGROUP

## REGULAR MEETING

DECEMBER 10, 2025

9:00 AM

Redwood Room – 2180 Milvia St. 6<sup>th</sup> Floor

Fire Chief's Representative – Asst. Chief Colin Arnold

Assistant Chief David Winnacker  
Richard Illgen  
George Perez-Velez

Eric Weaver  
Margit Roos-Collins

### Preliminary Matters

Call to Order

Approval of November 26 Minutes

Public Comment on Non-Agenda Matters

**AGENDA MATTERS** *All Regular agenda matters are for discussion and possible action.*

1. **Action:** Discussion and possible action on suggestions for the Resident Guide.  
**Written Materials:** Proposed Ideas with Context for the Resident Guide

### WORK GROUP REPORTS

### Adjournment

*This meeting will be conducted in accordance with the Brown Act, Government Code Section 54953. Any member of the public may attend this meeting. Questions regarding this matter may be addressed to the Wildland Urban Interface Division of the Berkeley Fire Department, [wildfire@berkeleyca.gov](mailto:wildfire@berkeleyca.gov) 510-981-5620. Communications to Berkeley boards, commissions or committees are public record and will become part of the City's electronic records, which are accessible through the City's website. Please note: E-mail addresses, names, addresses, and other contact information are not required but, if included in any communication to a City board, commission, or committee, will become part of the public record. If you do not want your e-mail address or any other contact information to be made public, you may deliver communications via U.S. Postal Service or in person to the secretary of the relevant board, commission, or committee. If you do not want your contact information included in the public record, please do not include that information in your communication. Please contact the secretary to the relevant board, commission, or committee for further information. Any writings or documents provided to a majority of the commission regarding any item on this agenda will be made available for public inspection at Berkeley Fire Department located at 2100 Martin Luther King Jr. Way Berkeley, CA.*

**COMMUNICATION ACCESS INFORMATION:**

This meeting is being held in a wheelchair-accessible location. To request a disability-related accommodation(s) to participate in the meeting, including auxiliary aids or services, please contact the Disability Services specialist at 981-6418 (V) or 981-6347 (TDD) at least three business days before the meeting date. Please refrain from wearing scented products to this meeting.

I hereby certify that the agenda for this regular/special meeting of the WUI Vegetation Code Workgroup was posted at the front of the Old City of Berkeley City Hall Bulletin Board, as well as on the City's website, three days prior to the scheduled Commission meeting.

**SECRETARY SIGNATURE**

*Colin Arnold*

## **Berkeley's FireSafe Guide for the landscaping around your home**

### **Our Shared Goal**

The **Berkeley Fire Department** is your best partner and resource in understanding wildfire risk and building a plan that feels right for your home.

This guide is designed to help you move toward compliance **without unnecessary stress** — balancing wildfire safety with the beauty, comfort, and sense of community that make Berkeley such a special place to live.

### **Resident Guide for implementing defensible space for homes at risk of wildfire**

This guide helps residents and property owners develop best practices for their homes when it comes to vegetation, and is designed to cater to individual preferences, such as pollinator friendly choices, erosion concerns, or native species to our region. While this guide is a good reference for anyone, there are specific rules for vegetation based on where you live, and some properties are **REQUIRED** to follow parts of this guide when it comes to what they plant around their home. Visit [BerkeleyFireSafe.org](https://BerkeleyFireSafe.org) to learn more, and see what the rules are for where you live. This should be widely available to both the affected zones, and those who may have a vested interest.

### **Why Berkeley's Approach Is Different Overarching Themes:**

#### **Why are the rules for that different in Berkeley than at the state level?**

Berkeley includes hillside areas bordering open space and regional parkland, which have a high wildfire risk (wind-driven embers, steep slopes, older forest/vegetation). The local fire department has identified those risks, and the ordinance is tailored accordingly. Local conditions justify more stringent measures under local authority: the city code amendment states findings of “local conditions ... requiring more stringent standards than those provided by the 2022 California Fire Code.”

In 2025, the Berkeley City Council determined that, based on the risk of wildfire loss faced by residents, especially those along the eastern edge of the city, that there was enough information to act and require strict vegetation rules in certain areas. These rules are designed to reduce the number of structures that ignite when a wildfire encroaches on the

border of our city. These rules are designed to prevent embers, cast well ahead of a fire, from creating sources of ignition that might ignite a home.

### **Why Berkeley's Approach Is Different**

Berkeley's hillsides have steep slopes, heavy vegetation, and seasonal winds — conditions that create some of the highest wildfire ember/firebrand risk in the Bay Area.

Rather than wait for statewide rules, Berkeley chose to act now.

- **Local focus:** The fire code targets EMBER ordinance targets the areas where science and history show the highest risk.
- **Emphasis on vegetation:** Managing plants and landscaping gives immediate risk reduction while residents pursue home hardening measures as they can, without requiring expensive reconstruction.
- **Balanced enforcement:** The city's goal is education and support — not punishment — so homeowners can plan and adapt at their own pace.
  - **Half the Battle:** When combined with home hardening, defensible space may reduce the risk of ignition from wildfire by as much as 80%. Tackling vegetation challenges now allows homeowners to get started while they take advantage of the free home hardening programs available now, and they come up with a game plan for the future.

### **Why is it important to do this?**

When residents follow the EMBER standards — especially creating that first **five-foot "Zone 0" buffer** — they're not just protecting their own homes; they're helping firefighters protect the entire neighborhood.

#### **1. Helping the Fire Department Fight the Fire**

- **Reduces ignition points:** Most homes lost in urban-interface fires don't burn from direct flames — they ignite from *wind-blown embers*. By clearing combustible materials near walls, decks, or fences, you drastically cut the chance that your home will ignite in the first place.
- **Creates defensible space:** When one home resists ignition, it becomes a *firebreak* that slows the spread to others. That gives firefighters critical time to deploy resources where they're most needed.
- **Improves firefighter and resident safety:** Crews working in dense, overgrown areas face extreme heat, unpredictable flare-ups, and blocked access routes. Ember-resistant

zones and thinned vegetation make it safer to operate equipment, move hose lines, and defend structures.

In short: every compliant property becomes a safer, more defensible position for the fire crews protecting it. When fewer homes are igniting, responders can focus on the homes that are threatened. Slowing the spread also helps give people more time to get out.

## 2. Protecting Those in the Highest-Risk Areas

Berkeley's hillsides are at the intersection of steep topography, heavy vegetation, and seasonal wind patterns — the *perfect mix for ember storms*.

When residents in these highest-risk zones follow the EMBER guidance:

- They **reduce radiant heat and ember load** that can threaten adjacent homes downhill.
- They **protect evacuation routes** by minimizing roadside vegetation ignition.
- And they **allow firefighters to concentrate on containment**, rather than defending every individual structure under impossible conditions.

The work you do immediately around your home is the single most effective thing you can do to stop your home from igniting from wildfire. And if your home doesn't ignite, your neighbors home is also much better protected. Furthermore, defensible space help the fire department do their jobs after the fire starts. While doing this work on one property helps stops embers and wildfire from igniting that home, because our homes are so closely spaced, we need to rely on our neighbors to be proactive as well in order to effectively protect ourselves.

This is about re-evaluating our relationship with the environment we are in, and evolving with it. We have a Mediterranean climate. We can't force another reality. How to we balance this with encouraging the environment around us where we can (birds, etc). Berkeleyside had a thoughtful article that looked back on how landscaping choices have evolved in Berkeley:

Mediterranean climates like Berkeley's are found in only 2% of the earth's land mass. Our mild summers and inexpensive water pumped from Sierran rivers have made it possible to grow plants from a much broader range of climates and to successfully imitate garden styles developed for rainy summer locales. Part of learning to live sustainably in Berkeley is learning to cherish gardens that need less water. Mediterranean gardens are a good source of inspiration as they often include hardscaping adjacent to a home.

## Living with the Environment, Not Against It

Berkeley's Mediterranean climate — dry summers, mild wet winters — means we live in a fire-adapted ecosystem.

The EMBER initiative asks us to **re-evaluate our relationship with the landscape**:

- To design gardens that are *beautiful and resilient*: drought-tolerant, low-fuel, and still alive with pollinators and birds.
- To embrace Mediterranean-style hardscaping and native plant palettes that reduce fire risk while maintaining character.
- To balance *ecological health* with *human safety*.

The Berkeley Fire Department is your partner in this. They want to help you:

- Understand what to do,
- Make a plan that fits your property and budget,
- And feel *good* about how your home looks and how safe you feel living there.

Use the resident guide as a personal roadmap — one that balances beauty, ecology, and safety — and helps ensure that when the next fire comes, your home, your neighborhood, and your firefighters all stand a better chance.

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## Here's How You Get to Compliance

Reaching compliance with the EMBER standards isn't about passing or failing — it's about *progress*. The City of Berkeley Fire Department is here to help you every step of the way.

## 1. Start with a Self-Inspection

Begin by using the **EMBER Self-Inspection Checklist**.

Walk around your property and note:

- Combustible materials within 5 feet of your home
- Overgrown vegetation near walls, decks, or fences
- Items stored under eaves or decks
- This helps you see where you stand before scheduling an inspection. For any items that you have questions or concerns about, save them for the inspection with the Inspector.

## 2. Schedule an assessment with a FireWise leader, if desired.

Some people would like to hear directly from the Fire Department, in which case, skip to the next step and reach out! Others might want to hear from their neighbors who have been specifically trained to support the effort, and often have additional creative solutions to the challenge that can meet the goal of reducing risk while also maintaining the unique character of the home. Your local FireWise leader can connect you with an Ambassador to meet with you.

## 3. Schedule an Inspection

Next, request an Inspection from a Fire Department inspector.

Inspectors will:

- Walk your property with you (or on their own, with your permission)
- Identify the highest-risk areas and prioritize actions
- Note the highest priority items as violations to be addressed within 2 months
- Help create a **personalized plan** with benchmarks to meet each cycle

This plan focuses on what matters most first, so you can make steady progress without feeling overwhelmed. Items on the personalized plan will not be flagged as violations if managed within the established timeline.

This form documents:

- What you've already done
- What remains to be addressed

- Your target timeline for full compliance

It serves as your roadmap — and your record of effort and progress.

Some owners may have practical difficulties with meeting the code. This may be due to a number of reasons, and property owners with these concerns can address them with an inspector to determine if a modification of the code is required. One of the most common modifications is for time; inspectors and responsible parties agree on a timeline for compliance that spans multiple inspection cycles.

## **5. Work Toward Full Compliance (This is where we add the three year possible compliance plan)**

The **Compliance and Enforcement process** varies depending on your area's risk level. Generally:

- The first action items identified in your plan should be completed **within 60 days** of your inspection.
- Inspectors will re-check progress and help you stay on track. Its important to take action after the inspection so that you don't lose momentum, or worse, become subject to fines.
- Visit [BerkeleyFireSafe.org](https://www.BerkeleyFireSafe.org) to learn about services, grants, and other programs that can help you make progress, often for free. From there, you can also learn what people are doing around you, who they are using to help them, and more!
  - Continued communication and visible progress keep the process supportive, not punitive.

### **Remember:**

Fire inspectors aren't just enforcing rules — they're partners in protection. Their goal is to make your property safer and help you feel confident about your next steps.

Each improvement you make strengthens your neighborhood's resilience and gives firefighters a safer, more defensible environment to work in when it matters most.

### **Wildfire Alternate Means And Measures Requests:**

Some residents may prefer to seek alternate ways to achieve the same practical effect, either because they have certain vegetation that they really like, or because they have sensitive areas or concerns that are specific to their property. These residents can request an AMMR to be reviewed by Fire Department staff. While there are myriad possibilities for what might be possible, below are a few examples that might be commonly encountered.

#### **Example One**

**Homeowner goal:** You want to keep succulents in Zone 0. You believe they cannot burn during a wildfire.

**Firefighter goal:** We want to keep fire away from your house. Even naturally moist plants will eventually burn when exposed to fire, and Zone 0 is designed in part to keep your house separated from ember-driven spot fires that may start in the duff or trapped dead plant material of your yard or your neighbor's yard. There is currently no approved list of plants that are fire-suppressant, such that if they are exposed to flames or the duff trapped in them is lit by embers, the resulting fire would naturally extinguish because the plant is not flammable. However, there is a process to prove that a plant is not flammable.

Alternate Materials and Methods Request (AMMR): To get an AMMR allowing a succulent to remain within Zone 0, you would need to submit a suitable sample to a lab for testing to determine if that species, maintained in a manner to meet the conditions present at the time of testing meets the relevant test standards as outlined in Section 703A.7 Standards of Quality in the California Building Code

If the plant met the relevant test standard, that would serve as the foundation for an AMMR permitting it to remain. Once a species passes the relevant test standard, that result becomes available for others to use for their own AMMRs for the same species.

The relevant test standard (temperature and duration) will be matched to conditions at the site. In general, three scenarios apply to most homes in the Berkeley Fire Zones.

1. [Firebrand ignition](#). For this standard, the temperature and time of the ignition test match the burning characteristics of a hollow Eucalyptus [bark cylinder](#) or

2. Zone 1 vegetation ignition. For this standard, the temperature and time of the ignition test match the burning characteristics of [chaparral shrubs](#).

3. Adjacent structure ignition. For this standard, the temperature and time of the ignition test match the burning characteristics of a [burning structure](#)

### **Example Two**

**Homeowner goal:** You want to keep grass or another low groundcover in Zone 0.

**Firefighter goal:** We want to ensure that there's no dead grass next to the house, since dead grass is easily lit by embers and firebrands. We also want to ensure that the grass stays low enough that it does not become a significant source of fuel if lit by a fire in Zone 1 and that it does not trap a significant amount of dead plant debris that could become fuel.

The AMMR would spell out the groundcover chosen, the maximum height at which it would be mowed or otherwise maintained and self-reporting requirements for both maintenance and irrigation, typically met by voluntary verification on a monthly basis during fire season to BFD.

### **Example Three**

**Homeowner goal:** You want to keep a favorite shrub or dwarf tree next to your house.

**Firefighter goal:** We want to ensure that the five feet next to your house is free of significant accumulations of dead plant material, including material trapped inside a shrub or dwarf tree or at the base of the shrub or dwarf tree, since embers will catch that material on fire, transmitting fire to the shrub or dwarf tree. All vegetation may burn when exposed to flames and will ignite at a lower temperature than houses, so burning shrubs or dwarf tree adjacent to a house can catch it on fire when the same house could have been spared by a non-combustible Zone 0.

An AMMR could be issued for shrubs or dwarf trees that have a minimum height of 6' and at least 1/3 the height of the plant is maintained as an air gap. Further, the shrub or dwarf tree must have an open architecture that will not generate or trap dead material in their interior, that generate minimal leaf litter below, that do not have peeling bark that would allow a ground fire to climb into the canopy, and that are pruned or grow naturally with an open, limbed-up structure such that leaf litter generated by the shrub or dwarf tree or blown from elsewhere is readily accessible and easily cleared from beneath and around the shrub or dwarf tree. The AMMR will specify maintenance requirements for the shrub and for clearing litter below and around the shrub.

That AMMR will also require a separation between the shrub and the beginning of your Zone 1 plants. This is because there is less regulation of the plants you keep in Zone 1; this zone is designed to burn and not threaten the home. They may more readily accumulate the leaf litter that would catch fire in an ember storm. It's imperative to keep any fires in your yard adequately separated from a shrub adjacent to your house. You would need to demonstrate that you have addressed additional mitigation by creating a non-combustible area in the adjacent portions of zone 1 so that it will not transmit fire from zone 1, to the vegetation in question, to the home.

## **Living Safely in Berkeley's Fire Environment**

### **1. Why This Matters**

This isn't just about compliance — it's about **re-evaluating our relationship with the environment we live in**. Berkeley's **Mediterranean climate** — mild summers, dry conditions, and vegetation adapted to periodic fire — is unique and beautiful. Living here means learning to coexist with this landscape safely and sustainably. That means choosing water-wise, fire-smart landscaping and creating defensible space that balances safety with the natural beauty of our neighborhoods. It also means preparing for, and **EXPECTING** the natural presence of fire that this landscape has been dependent on since long before we built homes in it.

The work you do **immediately around your home** is the single most effective thing you can do to stop your home from igniting during a wildfire.

When your home doesn't ignite, your neighbor's home is also better protected — and together, we create a stronger, safer community.

While taking steps on a single property helps reduce the risk of ember ignition, our homes are often **closely spaced**, and fire does not respect property lines. To effectively protect our community, we need to rely on one another to act.

### **Areas for further discussion:**

NEED the wind chart and description to explain why the eucs aren't the backstop to the problem (Need DW)

The WAMMR process and how to follow it

- o What if I need more time vs.
- o What if I want a technical modification
- o What if I have practical difficulties, vs. What if I just need more time?+
- My neighbor's happy to remove the plants but can't afford to do this work. Can I contribute to my neighbors' work instead of removing my prized shrubs?
- Can I remove a big juniper, cypress, pine, or eucalyptus from my yard instead of the plants closest to my house?
- Can I substitute home hardening and hardscaping?

How can I handle erosion, what do I do if the erosion issue is large enough that following the fire code will result in soil instability. Also, stormwater issues and how to handle.

Is there a reputable landscape architect or soils engineer that could provide a framework for how to explore whether you have erosion concerns. What is the best practice to reduce risk without increasing erosion concern. How to address stormwater management while also addressing fire concern.

If you have concerns, bring them up with an inspector to develop a path forward

Links to FireSafe Berkeley

BFD Site

BFSC Site

FireWise Comtes

DFSC

What is Defensible Space

Where does my responsibility end and my neighbors start?

Surely it can't be okay for a neighbor's future choices to impose a larger Zone 0 on my yard?!

## What Is Zone 0?

**Zone 0** is the **first 0–5 feet around your home or any structure** — including decks, fences, sheds, and garages.

This small area is the **most critical zone** in wildfire defense because **most homes ignite from embers**, not direct flames.

Wind-driven embers can travel **miles ahead of a wildfire**, landing in this space and igniting anything that burns — mulch, leaves, wooden fences, or furniture. Once the fire starts this close, it can easily spread to the structure itself.

## How Does It Affect Me?

Zone 0 is where **your home’s safety begins**. If this area is clear of combustible materials, your home is far less likely to ignite during a wildfire.

Because Berkeley’s neighborhoods are dense, your Zone 0 directly affects your neighbors, too. When one home ignites, radiant heat and flying embers can quickly spread fire from house to house.

By maintaining Zone 0:

- You dramatically reduce your personal fire risk.
- You protect your neighborhood and first responders.
- You help buy time for safe evacuation and coordinated firefighting.

## What Do I Do About It?

The goal in Zone 0 is to make it **“ember resistant.”**

That means **removing or replacing** anything that could easily catch fire. Here’s how:

Use our self-inspection checklist to help you determine what to do.

**Then, get creative with your new space:**

- Use **noncombustible materials** like gravel, pavers, or stone instead of mulch.
- Choose **low-growing, fire-resistant plants** like succulents or native species that retain moisture outside of the 5-foot perimeter
- Maintain a clean and clutter-free area within that 5-foot perimeter.

- Consider unique hardscape patterns that work with your landscape, and not just a hard perimeter around your home.
- Consider non-combustible art, water features, or small plants in 5 gallon, non-combustible containers
- Create social sitting spaces that look out at your yard using metal furniture.
- 

**Maintain:**

- Regularly clear debris buildup, especially before fire season peaks (June–October).
- Keep fences, decks, and siding in good repair to prevent ember intrusion.

**What Happens If I Don't Do Anything?**

Ignoring Zone 0 requirements increases your risk — and everyone else's.

If your home still has combustible materials right up against it:

- **Embers can ignite your property**, even if the main fire is blocks away.
- **Firefighters may not be able to defend your home safely** if vegetation or materials make it too dangerous to approach.
- **You may receive a notice of violation** and be required to make corrections within a set time frame under the city's fire code.

But more importantly — doing nothing puts your home, your neighbors, and your community in greater danger during wildfire events.

**Special Circumstances**

Some people may be willing to take extra steps elsewhere in order to keep something that might otherwise be a hazard, or violation of the code; say, a single small tree in zone 0, or a dense collection of native plants in zone 1.

These property owners will want to demonstrate that they can meet the intent of the code without the specific language within it. For properties with highly desirable attributes affected by the code, there is a process called the Wildland Alternate Means and Measures Record.

- o The applicant needs to identify what they are asking to apply this process to

o The applicant needs to submit evidence demonstrating specific standards that they are applying to the unique setting that provides the same practical effect as the established code.

Examples might be additional hazard reduction in surrounding zones, home hardening measures that exceed the minimum standards of the code, or use of materials that are shown to be non-combustible through testing.

o Go [HERE](#) for more information

What CAN I do with vegetation in a given zone?

When working from the structure out, consider a hardscape area that modulates between 5 feet from the home and further, rather than a hard line at exactly 5 feet. In zone 1, make free use of low growing groundcover between shrubs, and strike a balance between single, larger species of shrubs and small trees, and groupings of smaller plants. Use paths through the landscape to reduce the ability of fire to travel quickly towards the home. For larger groupings of shrubs, create visual space and reduce fire risk by building in additional, low growing ground cover between the shrub group and the structure.

This also helps with runoff or erosion concerns

How do I:

Make sure my tree has adequate spacing to the structure (walls, roof, etc)

What is COMBUSTIBLE? What isn't?

Why cant I have succulents within 5'

Where do I put my car

### **Hedges to Fences**

If I cut down my hedge, I'll lose the outdoor privacy between my house and my neighbor. What can I do to replace that privacy? Is the building department going to allow higher fences now?

Fence: range of approaches:

Low end: metal posts and wire, hog wire, chain link,

Medium: HardieBoard and steel supports – can use for privacy fencing

Higher: Corten steel panels, wrought iron, aluminum and steel designs. Rock, stucco, or brick walls (kept low in Berkeley for earthquakes)

When it comes to gates: can leave the wooden piece attached to the house. Substitute a metal panel on either side of a metal gate for first five feet.

Suggestions for replacements for common combustible/plastic items around the home

Fence

Shed

Compost Bins: Models that are rotating bins up on metal legs are good.

Hose

Trash Cans: These are a common cause of ignitions during ember storms. They should be kept outside of zone zero, or stored in a well designed container that can withstand ember and direct flame.

Emergency Supply Shed: a metal job box works well for this – air and water-tight.

Yard equipment: We often lean tools against the least visible side of the house or put under the deck or in a shed [plastic playsets and pools, wheelbarrows, seed spreaders, lawnmower]. When these tools have combustible parts like wood or plastic, consider replacing them or moving them to somewhere else.

No I have to remove my deck.

NO. But if its attached to the structure, it need to have the 5' zone incorporated around it if it is combustible (i.e. not stone, concrete, etc.)

FAQs

Quick QR card that links back to the website.

Link from FD website

What can I do about trees on my property, and especially eucalyptus.

Elements that can add to the appeal of Zone 0 landscaping:

Recirculating, solar-powered fountains.

A metal bench with bright pillows.

Pebble and stone slab walkways (with a few marbles mixed in for delight?) – or brick paths or decomposed granite or concrete.

Tiled outdoor spaces with plants in terracotta or ceramic pots.

A space expanded out from Zone 0 enough to include a metal dining table and chairs; it doesn't need to be a straight line at 5' from the structure, but can meander out into zone 1 to add interest.

DRAFT