

To: MOFD Board of Directors  
From: Steve Cohn  
Date: April 16, 2025  
Subject: Public Comment Agenda Item 10.1, Ordinance No. 25-03

This comment pertains specifically to the adoption of Exhibit A, The Official Map of the Moraga-Orinda Fire Protection District Fire Hazard Severity Zones.

It appears that this map is the same as the map recently created by CalFire.

I do not believe that this map accurately reflects the wildfire risk in Orinda (I have not examined the Moraga portion of the map).

While I agree that there is an extreme risk of wildfire in most, if not all, of Orinda, there are specific areas of the map that do not “smell right” to me, a casual observer.

I am not an expert so I pose the following question to the District: Does it have an expert opinion on whether or not the map that the board is being asked to adopt accurately reflect the wildfire risk in the district?

Below I comment on three specific areas in Orinda that do not seem right.

The first is the area between Scenic Drive and Estates Drive. This area was modeled by UC’s Center for Catastrophic Risk Management (CCRM) in its wildfire prevention proposal to Orinda in 2022. They modeled the risk of wildfire using the FlamMap software which has been in use since 2006. (This is the same modeling tool XyloPlan, Chief Winnacker’s new company, is currently using.) Their model showed an extreme risk of wildfire in the fireshed running between the two streets, projecting flame lengths in excess of 12 feet under certain conditions which translates to heat generation beyond “extreme”, precluding the ability of suppression units to get near the fire and most likely taking out the homes on Scenic and Estates. Maybe some mitigation work has been done to reduce the risk since 2022, but a recent examination of this fireshed by a fuel mitigation expert indicated that there is still tens of thousands of dollars of work needed to make the fireshed wildfire “safe”. (see <https://www.saferorinda.info/wildfire-prevention-in-orinda-example>) Yet, the CalFire map shows this area to be of moderate risk with the top (the riskiest portion) being unrated.

The next is the Wilder subdivision. My understanding is that at one point in time MOFD designated Wilder as a “shelter-in-place” neighborhood due to its low risk of wildfire. Looking at it, there is little to burn. Its west side is adjacent to unregulated wildland, but the development is over a half mile across with virtually no major vegetation. For most of it to be considered a Very High wildfire risk, and the rest High risk, when other areas in Orinda with more vegetation are not even rated, seems wrong.

Third is the Miramonte High School campus. The playing fields (football and baseball) are rated Very High and the building area High or Moderate risk, when they are hundreds of feet from any vegetation.

I do not know what the purpose of adopting this map is. If it is to put the fear-of-god into the residents of Orinda and Moraga, I believe that fear is already there. If it is to help people make their properties more fire safe, I don't see it accomplishing anything. If it is just to comply with a state law so that we can ignore it and move on to actually accomplish something, then maybe it is OK if you rubber-stamp it, even though it is faulty.

At the very least I think the Board should question the validity of the map and consider developing a map that accurately models the fire risk, neighborhood-by-neighborhood, property-by-property, and periodically (annually?) update the map to monitor the risk of wildfire over time (as we periodically survey and maintain our roads even though no one has ever died from a pothole).

Scenic – Estates Fireshed



Fire Hazard Zone Map

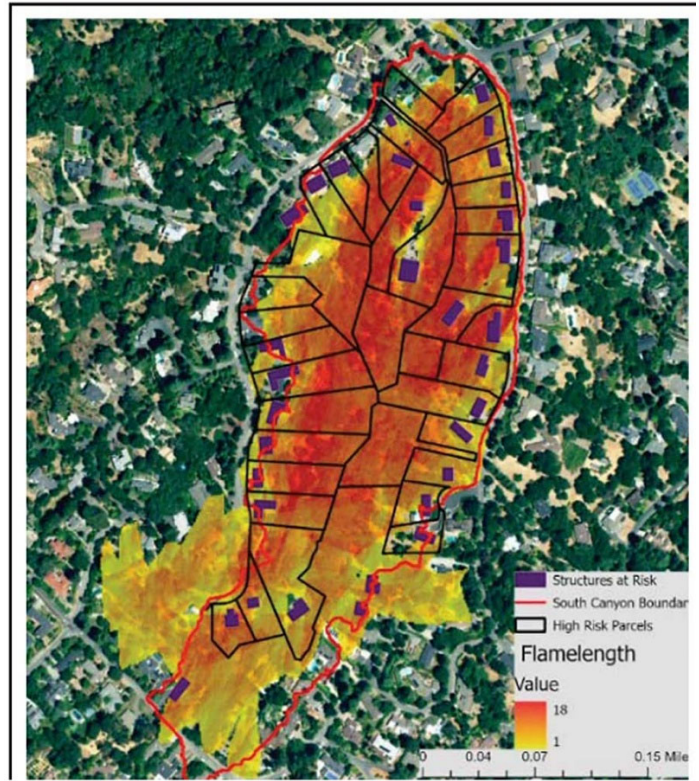
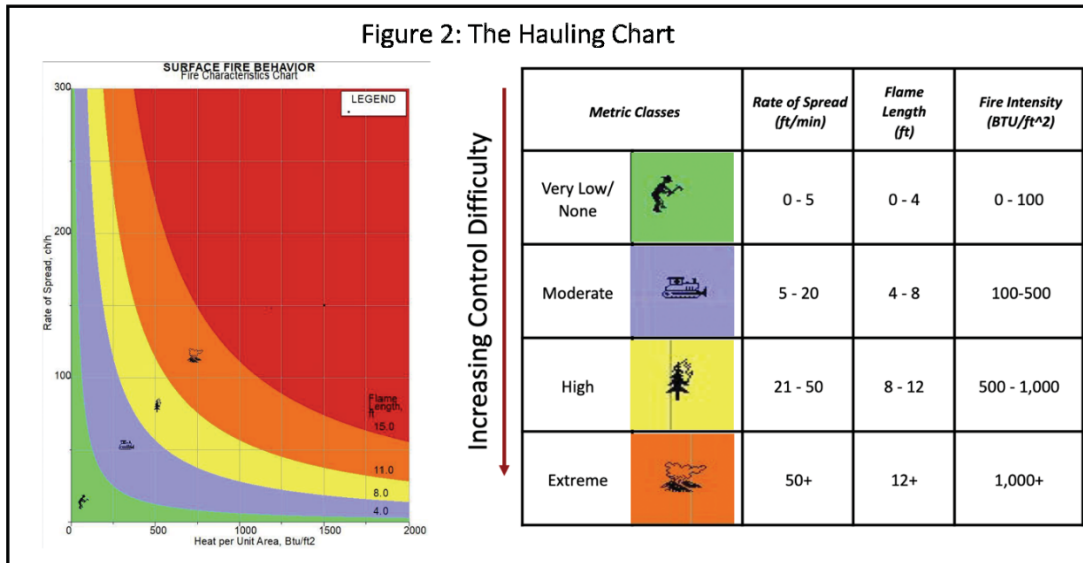


Figure 10: Prototype *fireshed* neighborhood

CCMP Model (FlamMap)



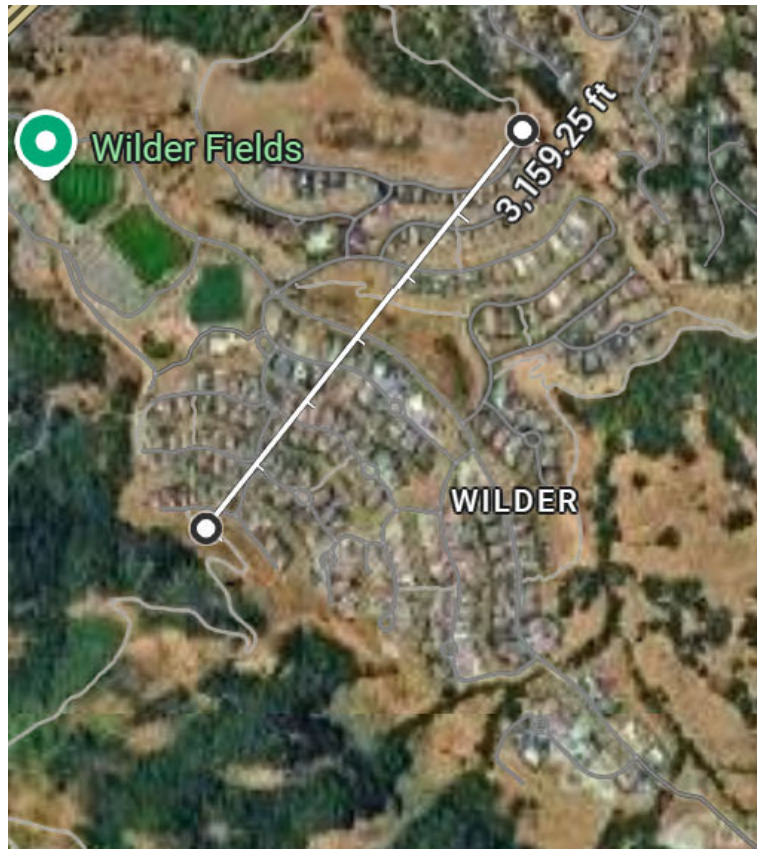
FlamMap predicts flame lengths as great as 18', energy in excess of 1,000 BTU per square foot. This is beyond extreme.

CalFire / MOFD Fire Hazard Severity Zone Map shows the same area ranging from high, to moderate, to unrated (safer than moderate).

## Wilder



Fire Hazard Zone Map



Satellite View

The Wilder development is over 3,000 feet across and is free of major vegetation. Because of its low risk of fire spread, MOFD has designated it a “shelter in place” neighborhood. How can the CalFire fire hazard zone map consider it mostly a “Very High” fire danger zone?

## Miramonte High School



Fire Hazard Zone Map



Satellite View

The Miramonte High School campus is 1,400 feet across and is free of major vegetation. How can the CalFire fire hazard zone map consider the playing fields a “Very High” fire danger zone and the buildings in a “High” hazard zone?

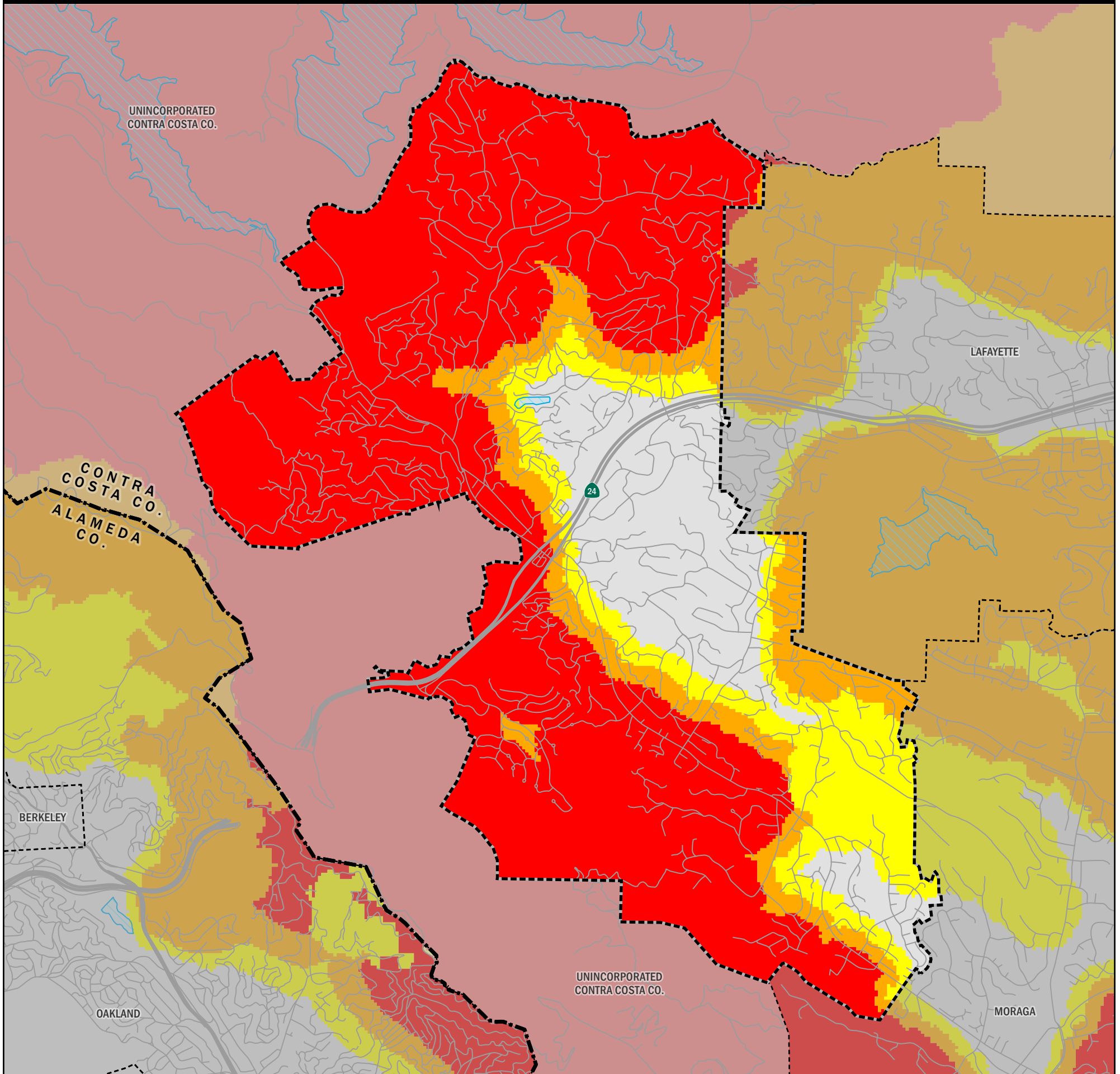


**CITY OF ORINDA – CONTRA COSTA COUNTY**

# Local Responsibility Area Fire Hazard Severity Zones

As Identified by the  
State Fire Marshal

February 24, 2025

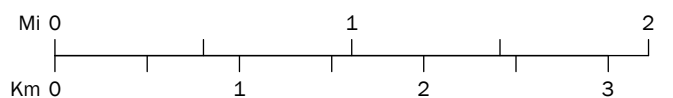


**Fire Hazard Severity Zones (FHSZ) in Local Responsibility Area (LRA), as Identified by the State Fire Marshal**

■ Very High    ■ High    ■ Moderate

**Fire Hazard Severity Zones in State Responsibility Area (SRA), Effective April 1, 2024**

■ Very High    ■ High    ■ Moderate



Projection: NAD 83 California Teale Albers  
Scale: 1:41,000 at 11" x 17"

Incorporated City     Waterbody  
 Unzoned LRA

Government Code section 51178 requires the State Fire Marshal to identify areas in the state as moderate, high, and very high fire hazard severity zones based on consistent

statewide criteria and based on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather,

and other relevant factors including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

The State of California and the Department of Forestry and Fire Protection make no representations or warranties regarding the accuracy of data or maps. Neither the State nor the Department shall be liable under any circumstances for any direct, special, incidental, or consequential damages with respect to any claim by any user or third party on account of, or arising from, the use of data or maps.

Gavin Newsom, Governor, State of California  
Wade Crowfoot, Secretary for Natural Resources, CA Natural Resources Agency  
Joe Tyler, Director/Fire Chief, CA Department of Forestry and Fire Protection  
Daniel Berlant, State Fire Marshal, CA Department of Forestry and Fire Protection

Data Sources:  
CAL FIRE Fire Hazard Severity Zones (FHSZSRA23\_3, FHSZLRA\_25\_1)  
CAL FIRE State Responsibility Areas (SRA25\_1)  
City and County boundaries as of 10/22/24 (CA Board of Equalization)

**From:** [John D Radke](#)  
**To:** [Info](#)  
**Subject:** Public Comment Agenda Item 10.1, Ordinance No. 25-03  
**Date:** Wednesday, April 16, 2025 2:40:46 PM

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To: MOFD Board of Directors  
From: John Radke  
Date: April 16, 2025

Subject: Public Comment Agenda Item 10.1, Ordinance No. 25-03

My comment pertains specifically to the adoption of Exhibit A, The Official Map of the Moraga-Orinda Fire Protection District Fire Hazard Severity Zones.

I have studied the landscape and potential wildfire risks in the East Bay for over 30 years. In 2020 we modeled 70 km<sup>2</sup>, including the City of Orinda, at 1 meter<sup>2</sup> spatial resolution using both airborne lidar and imagery (that included a near-infrared band). This is the spatial scale necessary to predict wildfire risk to any community.

The map on the <https://www.mofd.org/> web site entitled: "[Attachment B: Exhibit A The Official Map of the Moraga-Orinda Fire Protection District Fire Hazard Severity Zones MAP.pdf](#)", appears to have been constructed from a very low spatial resolution dataset. It is extremely simplistic and should not be used to assess fire hazard severity. This map does not represent reality and if used to assess neighborhood risk, let alone parcel level risk, would not serve the citizens of Orinda. I strongly urge you to not accept this as a valid document/map of the Moraga-Orinda Fire District Fire Hazard Severity Zones. It is false!  
John Radke, Orinda, CA

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*John Radke, PhD  
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