



Gunnison County Community & Economic Development Department

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From: Crystal Lambert, Building and Environmental Health Official

To: Board of County Commissioners

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Re: Updates to wildfire requirements for new development

Purpose

The State of Colorado adopted the Colorado Wildfire Resiliency Code ("CWRC:") on July 1, 2025 and jurisdictions have until April 1, 2026 to adopt a code for wildfire resilience that is no less stringent than the State CWRC.

The County's current wildfire code is the International Wildland Urban Interface Code ("IWUIC"), 2021 edition, which was implemented on January 1, 2023 and amended on November 7, 2023. There are some areas where the new State code is more stringent than the County's current wildfire code and adjustments will be necessary to meet the State's minimum code. There are also areas where the County's current wildfire code is more stringent or different than the State's new code creating an opportunity to evaluate which provisions remain appropriate for Gunnison County.

Representatives from the local building construction industry, including building contracting, development and design, landscape architecture, and materials supply, along with fire districts, and West Region Wildfire Council were invited to participate in a stakeholder engagement group to discuss the new State Wildfire Resiliency Code and the County's current wildfire code to identify which items would be appropriate to retain from our current code and help decide recommended modifications to the State minimum code for Gunnison County.

Background

Wildfire in Colorado is becoming more frequent and growing in intensity and devastation. Twenty of the twenty largest wildfires in state history have occurred in the 21st century (since 2001) and four of the top five largest wildfires in state history have occurred in the last five years (2020 and 2025). Additionally, the top five fires that have destroyed the most homes have occurred in the last 13 years, since 2012.

Wildfire impacts extend beyond property loss and are shared with the entire community through environmental damage, public health issues and economic impacts. There can be an increased risk of flooding and erosion due to post wildfire flows with increased risk of mudslides. Damage to watersheds can threaten drinking water supplies and aquatic species. Smoke from wildfires causes health risks to vulnerable populations, including children, the elderly, and those with pre-existing heart or lung

conditions. Communities affected by wildfires can experience economic losses with decreased home values, loss of businesses and negative impacts to agriculture, wildlife, tourism and recreation. There can be substantial recovery costs for rebuilding efforts, including debris removal, erosion control, infrastructure and road repair.

The *2025 Gunnison County Community Wildfire Protection Plan (“CWPP”)* provides comprehensive strategies to reduce wildfire risk and enhance preparedness so that our community can be ready to live with wildfire. <https://www.gunnisoncounty.org/1112/Community-Wildfire-Protection-Plan> The CWPP identifies building hardening and defensible space as key parcel-level strategies for community resilience.

In 2023, the Colorado State Legislature recognized that Colorado’s wildfire risk is increasing, and more communities are at risk of wildfire. Senate Bill 23-166 established a wildfire code board with the mission to ensure that Colorado Communities are safer from and more resilient to wildfire by reducing the risk to people and property through the adoption of statewide codes and standards based on best practice approaches to hardening structures and reducing wildfire risk in the defensible space surrounding structures in the wild-land urban interface in Colorado. The Colorado Wildfire Code Board consists of 21 voting members representing both rural and urban communities, building code professionals, fire code professionals, investor-owned utilities, commercial building professionals, home building professionals, architect with experience in wildfire codes, fire marshal with experience in wildland fire behavior, land use planning, hazard mitigation, nonprofit home builder for affordable home ownership, and county and municipalities with experience in implementing codes for wildfire resiliency and 3 non-voting ex officio members from the Colorado Division of Fire Prevention and Control, Colorado State Forest Service and the Colorado Resiliency Office. Since October 2023, I have served as a voting member of the Board, enabling me to contribute Gunnison County’s unique experience and rural perspective to the development of a code that works for all of Colorado. The Board met in person every month for over a year and a half and four advisory committees were created that met at least twice a month to focus on specific areas towards the creation of the Colorado Wildfire Resiliency Code. All meetings were posted and open to the public with public comment times at every meeting. Four public hearings were held around the state, in Sterling, Castle Rock, Montrose, and Glenwood Springs concerning adoption of the draft code and several hundred public comments, verbal and written, were received, heard and considered by the Board prior to adoption of the CWRC. Additional information about the Wildfire Resiliency Code Board, the Colorado Wildfire Resiliency Code and the State map can be found at the following website: <https://dfpc.colorado.gov/WRCB>

Overview of the Colorado Wildfire Resiliency Code

The CWRC defines the wildland-urban interface as “that geographic area where structures and other human development meets or intermingles with wildland or vegetative fuels.”

A map has been developed and designed as a tool for the application of the CWRC. The map encompasses both the current and potential wildland-urban interface as defined by the CWRC. For the purpose of code application and relevancy, the map only illustrates three levels of fire intensity (low, moderate and high). Low (yellow on the map) fire intensity areas correspond to Class 1 code requirements for construction and site hardening and Moderate (orange) and High (red) fire intensity areas correspond to Class 2 code requirements. The following is a link to the map:

<https://experience.arcgis.com/experience/34c113129c044004bc672ca5493378de/page/Page>

Jurisdictions can choose to adopt the State map or develop their own map. If a jurisdiction chooses to develop their own map it needs to be as stringent as the State map, including consideration of vegetative fuels, topography, local weather patterns, and fire behavior modeling data.

Adoption of the State map has several advantages, including elimination of local map maintenance and updating burden. The State map provides an accessible, printable and user-friendly online platform, and a ground-truthing process to verify or review a fire intensity classification.

The State map cannot be used for insurance purposes. Insurance companies use independent tools to assess risk and the Division of Insurance regulates all practices. The map is only used for the application of the Colorado Wildfire Resiliency Code. The insurance industry strongly supports building codes as a way to minimize and mitigate risk. Building codes can and do work to reduce risk during natural disasters and reduce risk of loss for individual property owners. Additional information about insurance and the Colorado Wildfire Resiliency Code can be found at the following link:

<https://doi.colorado.gov/wildfire-resiliency-building-codes-and-insurance>

The CWRC applies to new construction of structures and defensible space around structures, both residential and commercial. It is not a retrofit code and does not apply to existing development. Additions to existing structures that increase the footprint by 500 square feet or more will need to comply with the code for the area of the addition only. The code requires installation of a compliant roof covering when an existing roof covering is replaced or when 25 percent or more of the roof's surface area is replaced. Similarly, compliant exterior wall materials are required when 25 percent or more of the total exterior wall surface area is replaced. When the exterior wall material requirements are triggered, the 0–5 foot immediate structure zone must also be brought into compliance for defensible space.

The Class 1 code requirements are the least stringent and apply to all properties within the mapped wildland-urban interface. A summary of the Class 1 requirements are as follows:

Class 1 Exterior Building Materials

Roof-Covering or assembly classified as Class A when tested in accordance with ASTM E108 (UL790).

- Flame and ember protection of roofs--For roof assemblies where the roof covering profile creates a space between the roof deck, the space shall resist the entry of flames and embers.
- Roof Valley Flashing--No. 26 galvanized steel gage corrosion-resistant metal installed over a minimum 36" wide underlayment consisting of one layer of cap sheet complying with ASTM D3909 running the full length of the valley.

Gutters and downspouts-shall be constructed of noncombustible material.

Ventilation Openings-For enclosed attics, enclosed rafter spaces, and underfloor spaces shall be either:

- Tested in accordance with ASTM E2886, **or**
- Noncombustible corrosion-resistant mesh with openings not to exceed 1/8"

Class 1 Site & Area Requirements

Structure Ignition Zone 1 (0-5'), Immediate Zone

This zone is designed to reduce or eliminate ember ignition and direct flame contact with the structure, decks, stairs, and attachments. The requirements apply to the area from 0 to 5 feet from the structure.

- Use noncombustible, hard surface materials in this zone, such as rock, gravel, sand, concrete, bare earth or stone/concrete pavers.
Exception: Ignition-resistant plantings, per an approved list by the jurisdiction that is not less than that created by the Colorado State Forest Service, are allowed in the Immediate Zone.
- Remove all plantings including shrubs, slash, combustible mulch and other woody debris, with the exception of ignition-resistant vegetation.
- No planting of new trees in the immediate zone. Mature trees of no less than 10-inch diameter at 4.5 feet above ground level may be maintained. Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.

Site Signage

- Marking of Roads-Approved signs or other approved notices shall be provided and maintained for access roads and driveways to identify such roads and prohibit the obstruction thereof.
- Marking of fire protection equipment-Fire protection equipment and fire hydrants shall be clearly identified. (Don't disguise a hydrant as a shrub)
- Address markers-Buildings shall have a permanently posted address, which shall be placed at each driveway entrance and be visible from both directions of travel along the road.

Retaining Walls-Constructed with either noncombustible or ignition-resistant materials when any of the following conditions exist:

1. The wall is within 8 feet of a structure regulated by this code.
2. The wall is integral to the support of a structure.
3. The retaining wall is integral to the egress from a structure to a public way.

Fencing-Fencing within 8 feet of a structure shall be constructed with noncombustible or ignition-resistant materials. **Exception:** Vinyl fencing may be allowed.

The Class 2 code requirements apply to properties having a moderate or high fire hazard severity (orange or red on the State map). A summary of the Class 2 requirements are as follows:

Class 2 Exterior Building Materials

All the Class 1 items-Roof, gutters and downspouts, and ventilation openings.

Eaves and soffits shall be protected on the exposed underside by noncombustible, ignition-resistant, 1-hour fire-resistance-rated, 5/8" type X sheetrock, 2" nominal dimension lumber, or 1" nominal fire-retardant-treated wood.

Decks-Decking walking surface:

- Noncombustible materials
- Class A rated material
Except: composite decking can be Class B rating
- Fire-retardant treated wood identified for exterior use
- Ignition-resistant building materials

Glazing-Either multilayered panels, tempered, or have a fire protection rating not less than 20 minutes.

Exterior Doors-Noncombustible materials, solid core wood at least 1 ¾" thick, or 20 minute fire-protection-rated

Exterior Walls shall be constructed with one of the following methods:

1. Assemblies with a minimum of 1-hour fire-resistance rating, rated for exposure on the exterior side.
2. Approved noncombustible materials
3. Heavy timber or log wall construction
4. Noncombustible materials
5. Fire-retardant treated wood labeled for exterior use
6. Ignition-resistant materials

Such materials shall extend from the top of the foundation to the underside of the eave or the underside of the roof sheathing.

Exceptions:

1. Exterior wall embellishments and architectural trim (exclusive of trim on exterior windows and doors) not to exceed 5 percent of the square footage of the exterior wall.
2. Roof or wall top cornice projections and similar assemblies.
3. Solid wood rafter tails and solid wood blocking installed between rafters having a minimum dimension of 2" nominal.

Exterior wall coverings-Coverings shall be limited to the following:

1. Noncombustible materials.
2. Fire-retardant-treated wood.
3. Ignition-resistant building materials.

Exception: where options 1 or 2 (in Section 404.3 are used, vinyl siding may be used as an exterior covering.

Flashing-A minimum of 6 inches of metal flashing or noncombustible material applied vertically between the wall sheathing and the exterior cladding shall be installed at the ground, decking, and roof intersections.

Detached Accessory Structures located less than 50 feet from a building containing habitable or occupiable space shall have exterior walls constructed in accordance with Sections 404.3-404.3.2.

Underfloor Enclosure- Buildings or structures shall have underfloor areas enclosed to the ground or comply with the exterior walls in accordance with Section 404.3 (exterior walls).

Appendages and Projections shall be constructed in accordance with Section 404.3 (exterior walls).

Vehicle Access Doors shall resist ember intrusion by preventing gaps larger than 1/8". Gaps between doors and door openings shall be controlled by one of the following:

- Weather stripping
- Door overlaps onto jambs and headers.
- Garage door jambs and headers covered with metal flashing.

Class 2 Site & Area Requirements

All the Class 1 requirements- 0-5' immediate zone, retaining walls, fencing, site signage

Structure Ignition Zone 2 (5-30 feet), Intermediate Zone

Designed to give an approaching fire less fuel, which will help reduce its intensity as it gets nearer to structures. The requirements apply to the area from 5 to 30 feet from the structure.

- Dead Material shall be removed from live vegetation
- Fuels Accumulation-Avoid large accumulations of surface fuels such as logs, branches, slash and combustible mulch.
- Trees-Tree crowns extending to within 10 feet of any structure shall be pruned to maintain a minimum clearance of 10 feet. Prune tree branches to a height of 6-10 feet from the ground or a third of the total height of the tree, whichever is less.
- Shrubs-Shrub groups within this zone shall be spaced to prevent structure ignition. Shrubs shall be at least 10 feet away from the edge of tree branches.

Structure Ignition Zone 3 (30-100 feet), Expanded Zone

Focuses on mitigation that keeps fire on the ground.

- Tree crowns within this zone shall be spaced at a minimum of 6-10 feet.

Background of wildfire codes in Gunnison County

In 2018 Gunnison County received a grant from the Community Planning Assistance for Wildfire (“CPAW”) to help us understand our wildfire risk and provide specific recommendations to integrate wildfire-resiliency into the planning and development review process. The final recommendations from CPAW included adoption of the IWUIC, with amendments, definition of the WUI with the hazard assessment maps.

The CPAW team identified several challenges to addressing wildfire resiliency within land use planning in Gunnison County and many are still relevant today, such as existing developments without adequate wildfire safety and protection features (i.e. water supply, emergency access and neighborhood scale fuel mitigation), large transient demographic without knowledge of wildfire prevention and safety, such as evacuation routes, and a lack of voluntary engagement in wildfire mitigation practices. The CPAW team also identified a few opportunities that are still relevant today and have even become stronger since their assessment, such as our collaborative partnerships with local fire districts, the State Forest Service and the West Region Wildfire Council who provide assistance to further implementation of wildfire-ready and mitigation practices, such as fuel treatments, technical reviews on development applications, and assistance with on-site property assessments. Recently, the West Region Wildfire Council added an additional staff member who will work primarily in Gunnison County assisting County staff with implementation of the new wildfire resiliency code, property owners of both existing and new development with understand their wildfire risk and appropriate mitigation strategies and working with Emergency Management on implementation of the CWPP.

Comparison of the currently adopted IWUIC and the CWRC

Both the currently adopted IWUIC and the CWRC identify structure hardening and defensible space items depending on the wildfire hazard at the site.

The following items are areas where the County’s IWUIC adoption is **more** stringent than the CWRC and the items are further described below:

- Water supply requirements-not included in the CWRC

- Deck construction-CWRC regulates the decking surface only
- Vent opening locations-IWUIC prohibits vent openings in soffits and eaves
- Structure Ignition Zone 1 (0-5 feet)-CWRC has an exception for ignition-resistant plantings
- Accessory structures-Exempt in the IWUIC only if ≥ 50 feet from a habitable structure
- Application for large parcels-CWRC exempts ≥ 35 acres parcels with only one residence

Water supply requirements are not part of the CWRC. The IWUIC encourages parcels to have adequate water supplies for fire-fighting efforts by potentially reducing the amount of defensible space or degree of structure hardening. Water supply standards are costly for rural parcels. The stakeholder engagement group unanimously felt that water supply requirements should not be included in the new wildfire resiliency code and should be a consideration for new subdivisions and developments.

The CWRC requires that only the deck walking surface be regulated. The IWUIC requires that decks be constructed of ignition-resistant materials. The stakeholder engagement group supported the idea of only requiring decking material to be addressed, especially considering the exterior wall and metal flashing requirements.

The CWRC does not restrict the location of vent openings. The IWUIC prohibits vent openings in eaves and soffits, which is often the most desirable location for builders and designers. The stakeholder engagement group was supportive of removing the restrictions on vent opening locations.

The immediate 0-to-5-foot zone around a structure is designed to reduce or eliminate ember ignition and direct flame contact with the structure, decks, stairs and attachments. The County's adoption of the IWUIC allows only noncombustible, hard surface materials in this zone (i.e. rock, gravel, sand, concrete, bare earth or stone/concrete pavers). The CWRC has the same requirements with an exception that allows for ignition-resistant plantings, identified by the Colorado State Forest Service, in this zone. The Colorado State Forest Service guide for ignition-resistant landscape plants provides a recommended list of landscape plants with attributes that decrease ignitability, such as low oil or resin and moisture content, when properly maintained. The Wildfire Resiliency Code Board considered the requirements of the Insurance Institute for Business and Home Safety ("IBHS") for their Wildfire prepare Home Technical Standards in determining the requirements of the CWRC for insurance coverage and reduction of risk for damage or loss of structures from fire and tried to align with those requirements as much as possible and this is one exception. The allowance of ignition-resistant plantings within the immediate zone is one item that does not align with the IBHS standards. Recent updates to the IBHS Wildfire Prepared Home Technical Standards include ensuring the immediate zone is a noncombustible zone because it is a critical element in effective wildfire mitigation as seen in recent major wildfire conflagration events. The stakeholder engagement group supported **not** including the exception to allow for ignition-resistant plantings in the immediate zone. Ignition-resistant plantings would be difficult for building inspectors to verify, and the County does not currently have a maintenance inspection program. Allowing specific plantings within this zone will likely not translate to future property owners who might see an opportunity for additional vegetation.

The CWRC exempts detached accessory structures no greater than 120 square feet when located at least 10 feet from a habitable structure. The IWUIC exempts those structures when they are located at least 50 feet from a habitable structure. The current building code adoptions in Gunnison County exempt accessory structures no greater than 200 square feet from needing a building permit. Applying

the less stringent separation distance threshold is in better alignment with the adopted building codes and would be more efficient and practical to implement. The stakeholder engagement group supported the less stringent CWRC requirement excepting accessory structures less than 120 square feet when located at least 10 feet from a habitable structure.

Senate Bill 23-166 which established the Wildfire Resiliency Code Board with the task of defining the WUI and adopting statewide codes for new construction in WUI excluded “any thirty-five acre parcel with only one residential structure on it that does not abut a residential or commercial area” from needing to adhere to the code. Many of the 35-acre developments in the County are within the mapped areas of the WUI and established in layouts that do not provide adequate separation distance between adjacent building sites/envelopes commensurate with their overall acreage. Exempting those parcels from the wildfire code requirements is counterproductive to the goals of the wildfire code in creating wildfire ready and resilient communities. The stakeholder engagement group was supportive of continuing to apply the wildfire code to all parcels in the WUI regardless of size.

The following items are areas where the County’s IWUIC adoption is **less** stringent than the CWRC:

- Exterior wall embellishments and architectural trim-CWRC does not exempt window and door trim and allows only 5% of embellishments and other trim to be exempt
- Fencing-CWRC requires fencing within 8 feet of a structure be noncombustible or ignition-resistant
- Retaining walls-CWRC requires that retaining walls be noncombustible or ignition-resistant when within 8 feet of a structure, or integral to support of structures, or integral to egress
- Detached accessory structures (any size)-CWRC requires exterior wall material compliance when within 50 feet of a habitable or occupiable structure
- Ventilation openings-CWRC requires a mesh covering openings not to exceed 1/8” (versus ¼”)
- Additions and alteration-CWRC trigger is when 500 square feet or more is added versus 50% of the existing area.

The exterior wall requirements that apply when a property is in a moderate or high wildfire hazard area will apply to all trim work except for up to 5% of the square footage of the exterior wall for decorative embellishments or architectural trim. Decorative embellishments are elements incorporated in design and construction for an ornamental or decorative purpose that are not integral to the structure or structural support. Architectural trim does not include door or window trim but could include corner trim or other pieces. For example, a typical house 40 feet by 20 feet could have about 2,000 square feet of wall surface area and 100 square feet (or 5%) of embellishments and trim could be exempt from the exterior wall materials requirement.

The adopted building code exempts fences less than 7 feet in height from building permitting and the *Gunnison County Land Use Resolution* requires that fences in residential areas be limited in height to 6 feet. This combination of code requirements explains one of the reasons why the County has no record of building permits for fences. The CWRC requires that fences within 8 feet of a regulated structure be constructed with noncombustible or ignition-resistant materials. This will be a big change for our community and will require public outreach and engagement to communicate and successfully implement the new requirement for fencing.

The exterior walls of detached accessory structures (greater than 120 square feet) need to comply with the requirements (when in moderate or high wildfire hazard areas) when the location is within 50 feet of a building containing habitable or occupiable space. This is similar to our current requirements except that occupiable space has been added. Habitable Space is space in a building for living, sleeping, eating or cooking and Occupiable Space means a room or enclosed space designed for human occupancy in which individuals congregate for amusement, education or similar purposes or in which occupants are engaged at labor. Occupiable Space includes most commercial buildings, including industrial shop spaces and even agricultural and similar uses where people are actively engaged in labor.

Additions that increase the footprint of a structure by 500 square feet or more will need to comply with the requirements, for the addition only. Currently, the requirements for additions are where the area of the addition is more than 50% of the existing area does the area of the addition need to comply. The CWRC trigger of 500 square feet could be more stringent in some cases and less stringent in others depending on the size of the existing structure.

Recommendations

At their December 18, 2025, meeting, the Gunnison County Planning Commission reviewed the Colorado Wildfire Resiliency Code and the proposed amendments to that code as recommended by the stakeholder engagement group and unanimously recommended adoption of the following items to the Gunnison County Board of County Commissioners:

1. Adopt the Colorado Wildfire Resiliency Code and the State Wildfire Intensity Map, with the following local amendments:

a. Apply wildfire resiliency requirements to thirty-five-acre or larger parcels.

Although Senate Bill 23-166 allows an exemption for certain 35-acre parcels, many large-parcel developments in Gunnison County are located within mapped wildland-urban interface areas and are configured in ways that do not provide meaningful separation between structures. Exempting these parcels based solely on size would undermine the intent of the wildfire code and increase long-term community risk. Applying the code uniformly within the mapped WUI ensures consistent wildfire mitigation regardless of parcel size.

b. Require the Structure Ignition Zone 1 (0–5 feet) to consist only of noncombustible, hard-surface materials, without an exception for ignition-resistant plantings.

Maintaining a fully noncombustible immediate zone is one of the most effective wildfire mitigation measures and aligns with current best practices, including recent updates to the Insurance Institute for Business and Home Safety (IBHS) Wildfire Prepared Home standards. Eliminating the planting exception improves enforceability, reduces future maintenance and compliance challenges, and avoids confusion for subsequent property owners.

2. Adopt corresponding amendments to the Gunnison County Land Use Resolution (LUR) to align with the CWRC and State map adoption.

These amendments ensure consistency between land use regulations and building code requirements and support efficient, coordinated implementation. A summary of the proposed LUR amendments is provided in Appendix A.

Replacement of the IWUIC with the CWRC, as amended, will result in a wildfire resiliency code that is simpler, more consistent with statewide standards, and easier for applicants and staff to understand and implement. Adoption of the State wildfire intensity map shifts the responsibility for map maintenance and updates to the State of Colorado while providing a transparent, user-friendly tool with an established ground-truthing process.

Staff is requesting direction from the Board on whether to proceed with scheduling a public hearing for consideration of adoption of the CWRC and associated LUR amendments, or to schedule an additional work session for further discussion of specific policy items.

Please contact Crystal Lambert, Building and Environmental Health Official, with any questions. Thank you for your consideration.