



Memorandum

To: Planning Commission
From: Thomas Dansie, Director of Community Development
Date: October 10, 2025
Re: Recommendation to Town Council Regarding the Wildland Urban Interface (WUI) Code

Executive Summary

The Utah State Legislature has mandated that the Town adopt the [Utah Wildland Urban Interface \(WUI\) Code](#) by January 1, 2026 (see UCA 65A-8-203(9)). The Commission has discussed the WUI Code, impacts of its adoption, and strategies related to adoption of the WUI in recent work meetings. In the September meeting the Commission directed staff to place this item on the Commission's October agenda for formal recommendation to the Council, which would allow the Council to act on the item in their November meeting.

Analysis

The Town is required to adopt the Utah Wildland Interface Code by the end of 2025. See the following excerpt from Utah Code 65A-8-203(9):

*"If the state under Section 15A-2-103 adopts an edition of the Utah Wildland Urban Interface Code, issued by the International Code Council, with the alternatives or amendments approved by the division, as a wildland urban interface building standard that may be adopted by a local compliance agency... for purposes of an incorporated area within a county, **the relevant municipality shall adopt and enforce the wildland urban interface building standard** described in this Subsection (9)(a)." (emphasis added)*

Per technical experts at Utah Forestry, Fire, and State Lands, the Town is not able to alter the WUI to accommodate the Town's unique fire needs (except by making the Code more restrictive). Thus the Commission does not have wide discretion in either adopting or changing the WUI Code. However, there are two areas the Commission does have policy discretion: 1) establishing the WUI Boundary, and 2) adjusting the Town's land use ordinance to be consistent with the WUI Code.

The Commission should forward a recommendation to the Council regarding:

- 1) Whether or not to adopt the WUI Code (recognizing the State mandate to do so),
- 2) Where the WUI Boundary should be located, and
- 3) What changes to the Town's land use ordinance should be investigated as a result of adopting the WUI Code.

The Commission may also wish to make recommendations regarding public outreach and education efforts to inform the community about this significant change in building standards.

WUI Boundary

As discussed in previous meetings, the [State's mapping resources](#) suggest the entire Town be included in the WUI Boundary. If the Commission determines the WUI Boundary should not include the entire Town the precise placement of the WUI Boundary should be based on scientific findings. If the Commission would like to exclude portions of the Town from the WUI Boundary staff will work with available resources (e.g. Hurricane Valley Fire) to provide justifiable locations for the WUI Boundary.

Because determining where the WUI boundary should be located could be a technical and time consuming process, staff recommends the initial adoption of the WUI boundary should include the entire Town (as suggested and justified by the State's fire hazard mapping resources). If desired, staff can subsequently work with technical experts to identify and justify a refined boundary for the WUI.

Changes to the Town's Land Use Ordinance

It appears there may be several areas of conflict between the WUI and the Town's current land use ordinances. These include:

- *Allowable roofing materials (Section 10-16-4(B)(7)).* While not technically a conflict, the Town's land use ordinance allows membrane roof coverings for flat roofs. These types of roof coverings are sometimes Class C roofs, which result in a greater defensible space requirement. The Town could revise the code to require all flat roofs to have a Class B membrane roof covering. The land use ordinance also allows wood shingles, which are either a Class B or C material, depending on whether or not they are pressure treated. The Town could either remove the allowance for wood shingles, or require that wood shingles are pressure treated. These proposed revisions, in combination with other fire protection strategies, would reduce the defensible space requirement on a property.
- *Requirement to replace removed vegetation at a 2:1 ratio (Section 10-15B-4(A)(3)).* Requiring a property owner to replace native vegetation removed during construction at a 2 to 1 ratio sometimes results in trees being located very close to the building (especially on smaller lots with limited buildable areas such as in Anasazi Plateau or Kinesava). This can work counter to the goals of the defensible space requirement of the WUI. The Commission may wish to consider reducing the replacement ratio to 1 to 1, or otherwise altering the revegetation requirement.

The Commission discussed these issues in the September work meeting, without coming to a definitive decision. Staff recommends the Commission request direction from the Town Council to continue to analyze and research these issues. Based on this analysis and research the Commission can then make a well informed recommendation on potential needed changes to the Town's existing land use standards.

Education and Community Outreach

In the last meeting the Commission discussed the need for community outreach and education on this issue. The Commission may wish to recommend the Council direct staff to develop an education and information campaign. This could include: open house sessions to field questions and provide

information to the community, workshops on the new requirements for defensible space and strategies to provide defensible space on a property, newsletter articles, etc.

Summary

The Commission should make a recommendation to the Town Council regarding:

- 1) Whether or not to adopt the WUI Code (recognizing the State mandate to do so).
- 2) Where the WUI Boundary should be located.
- 3) What changes to the Town's land use ordinance should be investigated as a result of adopting the WUI Code.
- 4) What community outreach and education efforts should accompany the adoption of the WUI Code.