

[Space for Organization logos]



September 28, 2025

Via Electronic Mail

State Board of Forestry and Fire Protection
715 P Street, 10th Floor
Sacramento, California

Re: Zone 0 Mandate and AB 1455

Dear Chair and Members,

Together, our organizations represent thousands of Los Angeles households living in very high fire hazard severity zone neighborhoods who strongly oppose Zone 0 as currently drafted.

We have reviewed and fully endorse the attached three letters submitted by the **Los Angeles City Council**, and the City's Community Forest Advisory Committee (CFAC) and City of Los Angeles Fire Department (LAFD) report opposing Zone 0 in its present form. Their analysis makes clear that the regulations would:

- Destroy significant amounts of urban tree and shrub canopy, worsen heat islands and strip neighborhoods of shade and climate resilience;
- Ignore scientific evidence showing that structure-to-structure ignition and building materials drive fire loss, not well-maintained vegetation;
- Impose costly, unfunded mandates on residents while offering false safety that does not address the real hazard;
- Allow artificial turf and synthetic materials that increase fire risk and pollution.

Why Zone 0 Fails

- **False safety:** Research from the Insurance Institute for Business and Home Safety shows that in disasters like Paradise and Lahaina, the primary fuel was the built environment — houses, fences, cars, and sheds. Embers from burning structures leap house to house. Vegetation clearance in Zone 0 cannot stop this domino effect.
- **Science ignored:** Peer-reviewed research, including Escobedo et al., demonstrates that moist vegetation near homes can protect them, while bare ground and mal-pruned droughty shrubs increase risk. Zone 0 disregards this.
- **“Specimen Tree” Trojan Horse:** The touted tree exemption is no real exemption at all. Clearance rules force perpetual mal-pruning that weakens trees, shortens their lifespan, and burdens homeowners. Once a tree dies, it cannot be replaced — effectively making Zone 0 a “no tree zone.”
- **Ecological harm:** The proposed rules would accelerate canopy loss, worsen heat islands, and strip away protective greenscapes that help block embers and cool neighborhoods.
- **Financial burdens:** Thousands of Los Angeles homes were only recently added to the Very High Fire Hazard Severity Zone. Zone 0 imposes unfunded mandates on residents and local governments while ignoring the true hazard.

The Added Risk of AB 1455

As you know, **AB 1455** grants the Board authority to impose these rules through emergency powers if guidelines are not finalized by the end of this year. The State’s own analysis makes clear that this push was triggered not by new safety findings, but by media attention and political pressure on the Governor to act quickly.

Residents should not be forced into a **permanent cycle of emergency rulemaking** where decisions are made for optics rather than science. Rushed, one-size-fits-all clearance mandates would cause long-lasting damage to urban neighborhoods while failing to address the true drivers of catastrophic fire loss.

Our Request

As resident groups most directly affected, we urge the Board to:

1. Adopt the recommendations of the Los Angeles City Council, CFAC, and LAFD;
2. Reject a one-size-fits-all statewide clearance mandate;
3. Ensure AB 1455 is not used as a back door for rushed or poorly designed rules;

4. Advance fire safety measures that are evidence-based, equitable, and focused on true risks such as building retrofits and neighborhood-scale planning.

Conclusion

Los Angeles is not the wildland. Zone 0, combined with AB 1455, is a false promise: a politically expedient measure that strips away trees and other plants while ignoring the science of urban conflagration. The real hazard in the urban environment is structure-to-structure ignition, not plants.

We call on the Board to reject this path and instead adopt an approach that protects both public safety and the livability of our urban communities.

Sincerely,

[Space for Organization signatures]

Diana Nicole
President
Sunshine Hill Residents Association

Cc: Bob Blumenfield
Eunisses Hernandez
Ysabel Jurado
John Lee
Hugo Soto-Martinez
Adrin Nazarian
Traci Park
Nithya Raman
Katy Yaroslavksy



September 17, 2025

State Board of Forestry and Fire Protection
715 P Street, 10th Floor
Sacramento, California

**RE: LOS ANGELES CITY COUNCIL MEMBERS DEFENSIBLE SPACE ZONE ZERO
REQUIREMENTS RECOMMENDATIONS**

Board of Forestry and Fire Protection Members,

On January 1, 2021, Assembly Bill 3074 (AB 3074), known as the “Ember-Resistant Zones Act” went into effect. Citing a dramatic rise in the destructiveness of California wildfire events, AB 3074 established a new defensible zone that eliminates materials “likely to be ignited by embers” in a new space within 0'-5' around structures in State Fire Responsibility Areas and Very High Fire Hazard Severity Zones (VHFHSZ) within Local Fire Responsibility Areas. We are aware that your Board is now in the final stages of creating guidelines for these positions, and intend to finalize them by the end of this year.

The catastrophic fires in Altadena and the Pacific Palisades earlier this year proved that in the face of a worsening climate crisis, not only are structures located on hillsides in the Wildland Urban Interface (WUI) threatened by fire and windstorm events, but so are our dense urban neighborhoods.

The Los Angeles City Council has received a report from the City of Los Angeles Community Forestry Advisory Committee (CFAC) and the Los Angeles Fire Department (LAFD), regarding the effects your proposed recommendations for landscape management would have on our districts and all VHFHSZs in the City of LA¹. We are currently considering the implications of that report in our Public Safety Committee with full recommendations to be considered by the City Council shortly.

¹ City of Los Angeles Council CFAC and LAFD Report Back [10-2468-S2](#)

Given the analysis in that report, we have serious concerns that some of the current recommendations may do more harm than good when applied in urban Los Angeles. Our key concerns are laid out in this letter.

Destruction of Tree Canopy

One of the most alarming aspects of the proposed Zone 0 Defensible Space regulations is the impacts that it would have on the existing tree canopy in many Los Angeles neighborhoods, including Silver Lake, Echo Park, and Hollywood in CD 13; Highland Park and Chinatown in CD 1; the Hollywood Hills, Laurel Canyon, Runyon Canyon, and Griffith Park neighborhoods of CD 4; Eagle Rock, Highland Park, Hermon, Monterey Hills, Rose Hill, El Sereno and Lincoln Heights in CD 14; as well as most of the South San Fernando Valley hillsides and almost all of the Santa Monica Mountains Zone. Though the intention of AB 3074 was to create an ember resistant zone around structures, what has been proposed is the creation of fully non-combustible zones, lacking almost any vegetation. In many of these communities, single family homes and apartments have been constructed on small lots, many times with less than five feet to the property line. This proposal could eliminate hundreds of acres of healthy vegetation and trees in older, denser neighborhoods, many of which lack adequate greening as is, and clear the way for invasive, less fire-resistant species to grow in their place.

The report from CFAC and LAFD indicates that in Silver Lake, up to 18% of the tree canopy could be impacted or removed.² In Highland Park, up to 12% of the tree canopy stands to be impacted or removed.³ Under these proposed guidelines, implementation could also require the removal of healthy street trees from the public right-of-way, which provide shade, aid climate adaptation, and increase fire resilience. In our City—which is already struggling to maintain, let alone expand, access to shade and greenspace, particularly in low-resource areas—the impact of regulations could destroy progress towards our tree equity goals⁴.

Removal of Fire-Resistant Healthy Vegetation Not Supported By Science

Contrary to this policy’s aim to create new ember-resistant zones by eliminating vegetation near structures, UC Berkeley researchers observed in the aftermath of the recent Southern California firestorm events that the presence of defensible space is not a primary fire risk to structures in Wildland Urban Interface areas. Rather, the case studies demonstrated that the primary risk was the spacing of structures and the flammability of their materials⁵. In many cases from the January 2025 fires in Altadena and the Pacific Palisades, it was observed that green, well-maintained vegetation was able to slow the spread of fires, block flying embers, and save

² City of Los Angeles Council CFAC and LAFD Report Back [10-2468-S2](#) (Page 10)

³ City of Los Angeles Council CFAC and LAFD Report Back [10-2468-S2](#) (Page 10)

⁴ [Los Angeles Urban Forest Equity Collective](#)

⁵ [“Isolating the Primary Drivers of Fire Risk to Structures in WUI regions in California,”](#) Michael Gollner, et al. 2025.

structures⁶. Although it is not in the purview of your Board to examine the flammability of structures in your guidelines, research and advocacy from our region suggests an evidence-based approach to protect urban neighborhoods in areas with risk of wildfire may include the maintenance of protective and well maintained green spaces.

Artificial Turf in Defensible Space

In a previous version of these regulations, artificial turf was explicitly banned in Zone 0, but it has since been removed. Artificial turf is known to have a high heat-generating index and can release toxic fumes during fires. If there is one broad type of landscaping or treatments that should not be permitted in defensible space, it's synthetic materials that would further contaminate soil and stormwater runoff in wildfire affected areas.

Applicability and Impacts on Residents, Businesses, and City Staff

In addition to our concerns regarding the loss of healthy protective vegetation, valid concerns are raised about the cost and timeline for both residents and businesses in compliance and local jurisdictions for enforcement. With thousands of additional properties added to the VHFHSZ just this calendar year, and with these proposed stricter standards, the City will need additional resources to ensure compliance and residents and businesses will need financial support to comply. If the standards are adopted as is, we will need support for our personnel's expanded workload and support to assist low-resource residents with their compliance.

Outreach Process

The first Zone 0 Committee meeting was hosted in March 2025. Six months in, and after advocacy from Southern California, the State is now turning its attention to specifically engaging the Los Angeles region. If greater intentionality had been paid to our region in this process, it could have served as a launching point for greater awareness and ultimately compliance with the final rule. While we thank the Committee for now coming to Southern California, we urge additional engagement that acknowledges the urban context, unique ecosystems, and diversity of the City of Los Angeles.

Conclusion

With a deadline to finalize your Zone 0 Defensible Space guidelines by the end of the year, your Board has a limited amount of time to make your decision as it relates to fire safety, climate resilience, and the future of urban life and development in California. Based on the advocacy of CFAC and other environmental groups within our districts, we share concerns of a

⁶ ["California's proposed ban on plants near homes could be dangerously bad advice"](#) Moritz and Carmignani, 2025

one-size-fits-all approach to maintaining defensible space across the entire State. We urge you to consider the recommendations for Los Angeles in the September 8, 2025 report to the Los Angeles City Council from CFAC and LAFD and any recommendation as adopted by the full City Council following our current deliberations. Our request is that the decisions are evidence based, equity-focused, and balance the critical issues of both safety and liveability in the newly added urban areas of the VHFHSZ.

Sincerely,

Eunisses Hernandez
Los Angeles City Councilmember, 1st District

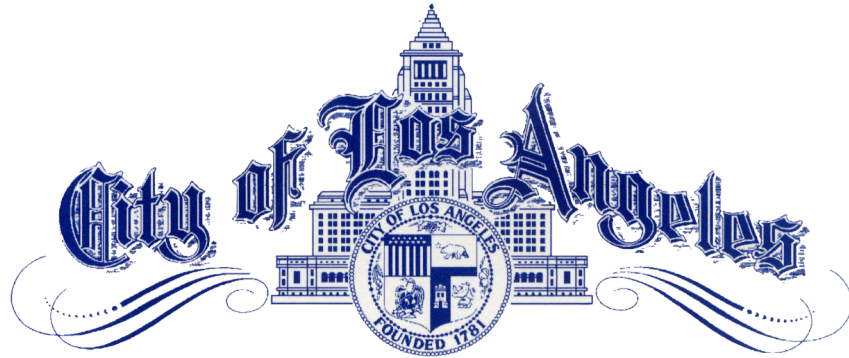
Nithya Raman
Los Angeles City Councilmember, 4th District

Katy Yaroslavsky
Los Angeles City Councilmember, 5th District

Hugo Soto-Martinez
Los Angeles City Councilmember, 13th District

Ysabel Jurado
Los Angeles City Councilmember, 14th District

CC: Joanne D'Antonio, Chair, Community Forest Advisory Committee
Cyndi Hubach, CD 13 Alternate Representative, Community Forest Advisory Committee
Scott Fajack, CD 13 Representative, Community Forest Advisory Committee
Deeanne Paul, CD 4 Representative, Community Forest Advisory Committee
Adele Slaughter, CD 4 Alternate Representative, Community Forest Advisory Committee
Charles Miller, CD 5 Representative, Community Forest Advisory Committee
Mindy Mann, CD 5 Alternate Representative, Community Forest Advisory Committee
Jack Smith, CD 14 Representative, Community Forest Advisory Committee
Angelic Perez, CD 1 Representative, Community Forest Advisory Committee
Lynnette Kampe, CD 1 Alternate Representative, Community Forest Advisory Committee



September 18, 2025

State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814

Dear Honorable,

We are writing to express our strong opposition to the Board of Forestry’s proposed Zone 0 recommendations and changes to landscape management in Very High Fire Hazard Severity Zones (VHFHSZ). Our opposition stems from the exclusion of local expertise, and the blatant disregard of the provisions expressed in AB 3074 (Friedman, 2020), calling for the creation of “ember-resistant zones” designed to consider local ecology and weather conditions. Furthermore, the Zone 0 recommendations would significantly decrease quality of life, public health outcomes, and environmental standards for all Angelenos, leading to higher mudslide risks, increased hospitalization rates stemming from excess heat, increased carbon emissions, increased utility costs, loss of habitat, decreased economic values, and loss of privacy, in addition to the myriad of other negative impacts.

In 2020, California Assemblymember Laura Friedman introduced AB 3074 “Fire prevention: wildfire risk: defensible space: *ember-resistant zones act*,” which aimed to increase property protection against wildfires burning under average weather conditions while allowing for consideration of ecological and other impacts, and required consultation with fire officials,

government representatives, environmentalists, and other stakeholders. The bill instructed the Board of Forestry to create guidelines for ember-resistant provisions in 2020, but no action was taken until after the Palisades and Eaton Canyon fires when Governor Newsom issued an executive order instructing the Board of Forestry to finalize the recommendations by the end of 2025. **Despite the requirement for local input, the Board of Forestry's Zone 0 Advisory Board had not visited the region to observe local conditions, nor were Los Angeles officials included in the drafting process of the proposed recommendations.** It was only after persistent pressure from local advocates that the Board of Forestry agreed to hold a meeting in Southern California in September of 2025, six months into the rulemaking process.

The Board of Forestry relied heavily on data from the Insurance Institute for Business and Home Safety (IBHS) – the insurance industry's research arm – to develop its proposed regulations. *Given the insurance industry's vested interest in California fire policy and the increasing rate of home owners' fire coverage being dropped, these test results alone cannot guide statewide policy-making decisions.*

The Board of Forestry's Zone 0 recommendations create a *non-combustible zone* instead of an *ember-resistant zone*, resulting in the prohibition of trees (with some exceptions), and all in-ground plants, shrubs, and lawns, within five-feet of any structure in the VHFHSZ, prompting the **estimated removal of nearly 2,000 acres of vegetation within the City of Los Angeles.** In some neighborhoods, these proposed regulations could result in the complete removal of all vegetation, resulting in decreased air quality, increased temperatures and loss of economic value.

Recent peer-reviewed studies on urban wildfires in Wildlife Urban Interface areas – where fire spreads uncontrollably from structure-to-structure – have shown that *building materials, home spacing, and moisture content in nearby vegetation are more predictive of home survival* than the presence of nearby vegetation. In many cases, trees, especially oaks and other large trees and hedges, can offer protection in wind-driven fires by catching embers and slowing winds. In photos comparing the before and after of the Palisades fire, some of the surviving homes had lush, well-maintained plants and shrubs which created a barrier from embers and wind, isolating homes and protecting properties.

If the proposed Zone 0 recommendations were to go into effect, the Los Angeles community would feel significant impacts from the mass removal of trees, shrubs, plants and other greenery, in addition to decreased environmental, human health and economic outcomes.

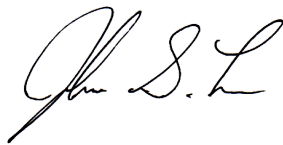
The loss of healthy vegetation in Los Angeles will significantly reduce community access to greenspace and tree canopy, resulting in increased carbon emissions and heightened utility usage for cooling. Additionally, the **removal of healthy, well-irrigated vegetation will increase Los Angeles's susceptibility to mudslides and flooding**, both of which are common during intense

rain storms. The proposed Zone 0 recommendations will also significantly impact the City of Los Angeles's environmental and biodiversity goals.

The proposed Zone 0 recommendations will impact all communities in Los Angeles, but the removal of vegetation within five feet of any building or structure will have the greatest impact on neighborhoods with high density zoning and small parcel sizes, often reflecting lower-income residents already facing adverse health impacts stemming from heat-related illnesses and higher temperatures. Additionally, the loss in tree canopy and vegetation will decrease the economic values of properties, neighborhoods and businesses. It is conservatively estimated that each property will incur \$13,000 in costs to meet the proposed Zone 0 recommendations, and it is extremely unlikely that the financial losses from forced compliance and decreased property values will be recovered.

It is with these environmental, public health and economic impacts in mind that we strongly oppose this one-size-fits-all approach to a statewide and regionally diverse challenge that is the creation of ember-resistant zones in California. **Los Angeles is both the largest city and county in California, and was completely excluded from this decision making process.** With the most to lose economically and environmentally, we urge the Board of Forestry to reevaluate their recommendation, using scientific evidence and real life scenarios from the most recent devastating wildfires in Los Angeles instead of insurance data from an industry with a significant stake in the outcome of the proposed Zone 0 recommendations.

Sincerely,



John Lee
Councilmember, Twelfth District
City of Los Angeles



Traci Park
Councilmember, Eleventh District
City of Los Angeles



Adrin Nazarian
Councilmember, Second District
City of Los Angeles



Bob Blumenfeld
Councilmember, Third District
City of Los Angeles



TRACI PARK

LOS ANGELES COUNCILWOMAN ★ 11TH DISTRICT

September 18, 2025

Zone Zero Regulatory Advisory Committee
California State Board of Forestry and Fire Protection
Sacramento, CA 94244

Re: Opposition to Proposed Zone Zero Regulations

Dear Members of the Zone Zero Regulatory Advisory Committee,

As the Los Angeles City Councilmember representing Council District 11, which encompasses some of the most wildfire-prone areas of our city, including Brentwood and the Pacific Palisades, I write to express my strong opposition to the proposed Zone Zero regulations currently under consideration.

The urgency of wildfire prevention is not abstract in my council district. In January, the Palisades Fire leveled the Pacific Palisades burning over 23,000 acres, destroying 6,837 structures, claiming 12 lives, and displacing tens of thousands of my constituents. My constituents and I understand the stakes and are committed partners in advancing fire safety but one-size-fits-all regulations that are overly burdensome, built on incomplete science applied without local input or context, and come without financial support for residents or additional funding for the municipalities tasked with enforcement will undermine this partnership.

Assembly Bill 3074 (Friedman) (AB 3074) instructed the State Board of Forestry to create regulations for a "five-foot ember-resistant zone" around structures in the Very High Fire Hazard Severity Zone with consideration for location and type of vegetation. The proposed regulations created and currently being reviewed by this committee go much farther than what AB 3074 requires, instead creating a noncombustible zone that would require the removal of an estimated 2,000 acres of vegetation and cost individual property owners approximately \$13,000 to comply. This decision to create a noncombustible zone seems to be based almost exclusively on data provided by the Insurance Institute for Business and Home Safety (IBHS) despite that data having been called into question by recent peer reviewed studies and the lived experience of Palisades and Eaton fire survivors. These studies suggest that well-irrigated vegetation can protect homes from embers in Wildland Urban Interface fires where fire spreads primarily from structure to structure, findings that are consistent with testimony from numerous Palisades residents whose homes were destroyed but their trees and shrubs remain or whose homes seemingly were saved because their or their neighbors' vegetation acted as a shield.

Mandating, or effectively mandating, the removal of trees, shrubs, and other vegetation within Zone Zero will further shrink our urban canopy, compromise slope stability in our hillside neighborhoods, and degrade wildlife habitat in sensitive ecosystems like the Santa Monica Mountains. Removing critical shade will make our neighborhoods and city hotter, increasing utility bills for residents and putting additional strain on our electric grid. Fire safety measures must be balanced with environmental stewardship, not pursued in ways that inadvertently exacerbate the very conditions that contribute to the increasing risk of fires in the wildland-urban interface.

1/2

The draft regulations as written will place disproportionate and impractical burdens on homeowners and local governments. In Los Angeles, tens of thousands of parcels fall within the newly expanded Very High Fire Hazard Severity Zone and will be subject to proposed Zone Zero regulations. Many residents are already complying with rigorous brush clearance and fire-safe building standards enforced by our Fire Department and Department of Building and Safety. Imposing even more stringent and costly requirements will strain homeowners financially, reduce compliance, and risk further eroding public trust in our fire safety efforts. The regulations as written are already being perceived by residents as punitive rather than protective and have the potential to cause real economic harm to middle and low income households as well as seniors and those with fixed incomes. The City of Los Angeles's budget, and that of its departments, is in a precarious financial state and our Fire Department is already burdened by the magnitude of the current brush clearance and enforcement work within current regulations. I urge the Board and the Committee to slow the process, expand stakeholder engagement, and work collaboratively with cities like Los Angeles that are on the front lines of wildfire risk. Any Zone Zero regulations must be practical and achievable, with additional state funding and assistance for property owners built in from the outset.

To date, the crafting of the proposed Zone Zero requirements under AB 3074 has happened in a silo up in Sacramento. Despite the mandate to complete these regulations coming from Governor Newsom's February 2025 Executive Order issued in response to the Palisades and Eaton Fires, the Zone Zero Advisory Committee has not visited the region or the recent fire areas or sought meaningful local input or expertise on the proposed regulations to my knowledge. It was only after months of outcry and the urging from passionate local advocates that the Board agreed to meet in Southern California. I appreciate the Zone Zero Advisory Committee's decision to hold its September meeting in Pasadena but I also urge the Committee to visit the Palisades and Eaton fire areas and speak to fire survivors and local experts outside of the September meeting. If the intention of these regulations is to protect our communities from future fires then these regulations need to be grounded in the geography, ecology, and reality of the Los Angeles region.

Wildfire prevention and resilience are shared priorities, and I welcome the opportunity to work with you to develop solutions that enhance fire safety without placing unsustainable burdens on our residents or municipalities. Thank you for your attention to these concerns, and for your commitment to protecting California communities.

Very truly yours,



TRACI PARK
Councilwoman, 11th District
City of Los Angeles