

Communication from Public

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Comments for Public Posting: Please see attached comment from Sunshine Hill Residents Association: Zone 0 will destroy our tree & shrub canopy but won't stop neighborhoods from burning.



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sunshinehillresidents.org

September 17, 2025

Comment Letter to the Los Angeles City Council Public Safety Committee
Re: Zone 0 Regulations and Urban Fire Safety

Zone 0 will destroy our tree & shrub canopy but won't stop neighborhoods from burning.

Honorable Committee Members,

Zone 0 is being promoted as a fire safety solution, but the science shows it will not deliver safety for Los Angeles. Clearing all vegetation within five feet of homes may sound decisive, but it does nothing to stop the true driver of catastrophic fire loss: burning buildings in dense neighborhoods.

IBHS: Homes Ignite Homes

The Insurance Institute for Business and Home Safety (IBHS) has shown that in disasters like Paradise and Lahaina, the primary fuel was the built environment—houses, fences, cars, sheds. Embers from burning structures leap house to house. Vegetation clearance in Zone 0 cannot stop this domino effect.

Escobedo et al.: Moist Vegetation Can Protect Homes

A double peer-reviewed study by Escobedo and colleagues found that moist trees near homes improved survival odds, while droughty shrubs and bare ground increased risk. Critically, building density and materials mattered more than vegetation in determining outcomes. Zone 0 ignores these findings.

The “Specimen Tree Exception”: A False Fig Leaf

Proponents claim Zone 0 allows trees within five feet of homes. But the fine print reveals a Trojan Horse:

- The vertical and horizontal clearance requirement from structures forces perpetual mal-pruning that weakens and shortens tree lifespans, and comes at great cost to the homeowner who are faced with a choice of no tree or financial hardship.
- Once a tree dies, it cannot be replaced—meaning Zone 0 is effectively a no tree zone.

What looks like flexibility is really a pathway to no trees at all in Zone 0.

Why Zone 0 Fails

- **False safety:** Clears yards, but doesn’t stop house-to-house fire spread.
- **Scientific misfit:** Moist vegetation can aid survival, but Zone 0 removes it.
- **Trojan Horse exception:** Today’s trees mutilated, tomorrow’s trees banned.
- **Ecological harm:** Accelerates canopy loss, worsening heat islands and fire spread.
- **Equity concerns:** Burdens homeowners while ignoring the true hazard.

The Better Path

Real safety comes from:

- **Building retrofits and codes**—fire-resistant roofs, vents, siding, decks, and fences.
- **Neighborhood-scale planning** to interrupt house-to-house ignition.
- **Moisture management**—irrigation and smart landscaping to keep vegetation protective.

Conclusion

Zone 0 is a false promise. It strips away trees while ignoring the science of urban conflagration. IBHS, Escobedo, and experienced fire professionals all agree: **the real hazard is structure-to-structure ignition, not plants.**

Respectfully submitted,

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Director at Large