

Communication from Public

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Comments for Public Posting: Please find attached a coalition letter submitted on behalf of City of Los Angeles homeowner and resident organizations representing thousands of households located in Very High Fire Hazard Severity Zone neighborhoods. Our coalition stands with the Los Angeles City Council and the City's Community Forest Advisory Committee (CFAC) in opposing the proposed Zone 0 Defensible Space regulations and urging the Board to adopt locally informed, science-based fire-safety policies.

COALITION OF LOS ANGELES HOMEOWNER AND RESIDENT ORGANIZATIONS

In Support of the Los Angeles City Council Opposition to Zone 0 Regulations



Garvanza Improvement Association



10/10/25

Via Electronic Mail

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

Re: **Zone 0 Regulation**

Dear Chair and Members,

Together, our organizations represent thousands of Los Angeles households living in residential neighborhoods designated as Very High Fire Hazard Severity Zones who strongly support the City Council's position opposing Zone 0 as currently drafted.

On October 7, 2025, the Los Angeles City Council unanimously voted to adopt the recommendations of the City's Community Forest Advisory Committee (CFAC) opposing the State Board of Forestry's proposed *Zone 0* regulations. The Council's action reaffirmed Los Angeles' commitment to science-based, locally informed fire-safety policy and explicitly rejected the removal of healthy, maintained, and hydrated vegetation within five feet of structures.

Councilmember John Lee, who introduced the motion, stated:

"I urge you to join me in opposing the State Board of Forestry Zone 0 recommendations. While we all share the goal of reducing wildfire risk, this one-size-fits-all approach will do more harm than good. The Board has crafted regulations that disregard our local input, ignore the practical realities of Southern California's fire landscape, and impose thousands of dollars in costs on residents who can least afford them."

Councilmember Katy Yaroslavsky added that Sacramento "was once again stuck in a Sacramento mindset," using data from suburban and rural regions while ignoring Los Angeles' uniquely urban context and fire-adaptive vegetation. She emphasized that healthy, hydrated, and well-maintained vegetation is not likely to ignite and that native plants and heritage trees are critical to both fire and heat resilience.

Councilmember Traci Park likewise emphasized that "these rules miss the mark," urging a methodical approach informed by research, local ecology, economics, and best practices.

We, the undersigned neighborhood associations, resident groups, and property-owner organizations, stand with the Los Angeles City Council in opposing the Zone 0 Defensible Space regulations as currently drafted.

Why Zone 0 Fails

- **False safety:** Research shows that the primary fuel in the urban environment is the built environment—houses, fences, cars, and sheds—not vegetation. Clearing plants within five feet cannot stop structure-to-structure ignition.
- **Science ignored:** Peer-reviewed studies (e.g., Escobedo et al.) demonstrate that moist vegetation near homes can *protect* structures, while bare ground and mal-pruned shrubs increase risk.
- **"Specimen Tree" Trojan Horse:** Claimed exemptions require destructive pruning that weakens trees, shortens their lifespan, and effectively turns Zone 0 into a "no-tree zone."

- **Ecological harm:** The rules would accelerate canopy loss, worsen urban heat, and remove vegetation that blocks embers and cools neighborhoods.
- **Financial burdens:** Thousands of Los Angeles homes were only recently added to Very High Fire Hazard Severity Zones. Zone 0 imposes costly, unfunded mandates on residents and local governments while ignoring the real hazard.

The passage of AB 1455 places additional pressure on the Board by requiring that Zone 0 regulations be finalized by year-end—or else the statute authorizes emergency implementation. While this law originated in the Legislature, the Board retains full discretion over how it fulfills its mandate. We urge the Board to prioritize scientific integrity and local consultation over speed, ensuring that regulatory deadlines do not override the City of Los Angeles’ unanimous call for a more thoughtful, locally informed approach.

As residents most directly affected, we urge the Board to:

1. Adopt the recommendations of the Los Angeles City Council;
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, financially responsible, and focused on true risks such as building retrofits and neighborhood-scale planning.

Zone 0, compounded by AB 1455, represents a false promise of safety—a policy that removes healthy vegetation, increases heat and erosion, and erodes local control without addressing the real drivers of wildfire loss.

The unanimous vote of the Los Angeles City Council—supported by its CFAC and Fire Department—makes clear that both residents and local leaders reject this misguided approach. The Board should honor that decision and adopt policies that protect public safety, private property, and the livability of our communities.

Sincerely,

David Gadd
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Historic Garvanza Coalition

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