

Communication from Public

Name: Diana Nicole

Date Submitted: 10/22/2025 03:42 PM

Council File No: 10-2468-S2

Comments for Public Posting: After reviewing the 10/23/25 Zone 0 rule draft in detail, our Association finds that it does not resolve the core concerns previously raised by Los Angeles homeowner, resident and neighborhood organizations as outlined in the attached letter sent to the Board of Forestry on October 10, 2025. While this draft introduces “vegetation options” and a new section (§1299.06) referencing local ordinances, the substance of the rule remains a statewide, one-size-fits-all clearance mandate that preempts local discretion and disregards urban ecological realities. The four “vegetation options” are not choices available to cities or homeowners. They are internal alternatives being considered by the Board prior to adoption of a single statewide standard under AB 1455. Each version, regardless of language, would apply uniformly across all Very High Fire Hazard Severity Zones, including dense urban neighborhoods such as those within the City of Los Angeles. • None of the options meaningfully accommodate local conditions, slope stability, or biodiversity. • Only Option 1 conditionally acknowledges trees protected by local ordinance, but that protection depends on whether the tree is “well-pruned and maintained” — leaving local ordinances effectively subordinate to state interpretation. • Option 2 eliminates any reference to local ordinances entirely, erasing protection for native and heritage trees such as California black walnut and coast live oak that are safeguarded under Los Angeles’ Protected Tree Ordinance (LAMC §46.00). • Section §1299.06 allows local jurisdictions to propose alternative compliance programs that “take into account” local ordinances, but those proposals are subject to state approval and must demonstrate “substantially similar practical effects.” This is not deference to local law; it is conditional permission that keeps ultimate authority in Sacramento. This structure directly conflicts with the City of Los Angeles’ adopted position, as reflected in the Community Forest Advisory Committee (CFAC) Report and Recommendations, which the City Council voted to accept on October 9, 2025. The CFAC Report calls for: • Integration of biodiversity and ecological health into fire-mitigation planning; • Retention of well-maintained, hydrated vegetation that reduces heat and erosion; • Preservation of local authority for implementation and enforcement; and • Protection of native and

street trees essential to public health and habitat. The current draft fails to meet these principles. It would centralize control at the state level, impose uniform vegetation removal standards unsuited to Los Angeles' built environment, and undermine decades of local progress in urban canopy preservation and ecological fire resilience. We respectfully urge the Board to: 1. Withdraw or substantially revise the current draft to ensure genuine local authority under §1299.06; 2. Include explicit language preserving local tree-protection ordinances; and 3. Work collaboratively with urban jurisdictions to create a performance-based standard that allows for safe, living vegetation and site-specific implementation. Without these revisions, the Zone 0 regulation will continue to suffer from the same structural flaws identified in earlier drafts — overly broad preemption, disregard for urban conditions and urban density, economic costs of converting properties to Zone 0, insurance cancellations and depressed values, and failure to integrate ecological science into urban fire policy. Sincerely,
Diana Nicole Sunshine Hill Residents Association

COALITION OF LOS ANGELES HOMEOWNER AND RESIDENT ORGANIZATIONS

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



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
President
Argyle Civic Association

Tani Kaye
President
Historic Garvanza Coalition

Missy Kelly
President
Beachwood Canyon Neighborhood Assoc.
Johnathan Brand

Rosa Rivas
President
Garvanza Improvement Association
David Lefkowitz

Executive Director
Bel-Air Association

David Kaden
President
Benedict Canyon Association

Carolyn LoBuglio
Chair
Brentwood Community Council

Thelma Waxman
President
Brentwood Homeowner Association

Eric Edmunds
President
Brentwood Hills Homeowners Association

Nina Standord & John Mass
Co-Presidents
Brentwood Park Property Owners Assoc.

Kate Blackman
President
Crestwood Hills Association

Jamie Hall
President
Laurel Canyon Association

President
Mandeville Canyon Association

Lisa Anne Auerbach
President
Mount Washington Alliance

Jessica Rogers
President
Pacific Palisades Resident Association

Jay Weitzler
President
Sherman Oaks Homeowners Assoc.

Barry Johnson
President
Studio City Residents Association

Diana Nicole
President
Sunshine Hill Residents Association

Kelly Lynch
President
The Oaks Neighborhood Association

Cc: Bob Blumenfield
Ysabel Jurado
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Eunisses Hernandez
Monica Rodriguez
Imelda Padilla
Marqueece Harris-Dawson

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Curren D Price
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Communication from Public

Name: Yael Pardess
Date Submitted: 10/22/2025 03:46 PM
Council File No: 10-2468-S2
Comments for Public Posting: HOMES THAT SURVIVED FIRES IN Altadena and Pacific Palisades Jan 2025 STUDY

HOMES THAT SURVIVED FIRES IN **Altadena and Pacific Palisades Jan 2025**

STUDY

The Board of Forestry (BOF) stated that examples of homes saved by healthy, hydrated vegetation were merely “anecdotal.” However, many homes- along with their surrounding vegetation- did survive the fires. This presentation compiles evidence from press reports, scientific research, landscape experts, personal testimonials and online research.

We hope the findings presented here will help clarify and demonstrate the role plants play as ember catchers, reinforcing what science and landscape professionals have long observed: Green, well-hydrated vegetation can save homes.

While it is true that survival may also depend on factors such as wind shifts, firefighter intervention, or home hardening, these examples at least prove that plants should not be blamed alone- and may, in fact, offer protection. The examples in this study beg more research to better understand these cases and to develop science-based regulations, that are region-specific, rather than a one-size-fits-all approach, before decimating healthy vegetation that is crucial for our health, safety and future.

This presentation confirms:

Healthy, well-maintained vegetation can save homes and should be permitted within Zone Zero and Zone I.

Altadena

Most homes burned, but many survived intact. Most trees survived including pines and non native trees



Communication from Public

Name: Yael Pardess
Date Submitted: 10/22/2025 03:47 PM
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