

Communication from Public

Name: Del Rey Residents Association
Date Submitted: 04/11/2025 04:50 PM
Council File No: 25-0002-S17
Comments for Public Posting: The Del Rey Residents Association prepared the attached letter on this issue.



April 8, 2025

California Board of Forestry
[Public Comments@bof.ca.gov](mailto:PublicComments@bof.ca.gov)

Re: Zone 0 Draft Regulations

Councilmember Traci Park (traci.park@lacity.org)
Re: Council File 25-0002-S-17 (Resolution)

On behalf of residents in the Del Rey neighborhood of Los Angeles, we offer the following comments on the draft of the Defensible Space Zone 0 regulations prepared for the April 7, 2025 meeting of the Board of Forestry and Fire Protection.

We have copied our Los Angeles City Councilwoman Traci Park because she also represents Pacific Palisades and has co-introduced the resolution cited above concerning the Fire Hazard Severity Zone maps.

The proposals to eliminate vegetation do not make sense given that in the January 2025 fires, the buildings carried the fire and burned the vegetation around the buildings. In both the Camp Fire (2018) and in Altadena (2025), the buildings that survived had large trees surrounding them that broke the high winds and intercepted embers, as was seen with the example of Christmas Tree Lane.

The proposed regulations also fail to follow the law, which requires that guidance from the Board of Forestry and Fire Protection include appropriate vegetation management suggestions that preserve and restore native species that are fire resistant or drought tolerant or both, minimize erosion, minimize water consumption and permit trees near homes for shade, aesthetics, and habitat. As written, the **exclusion of vegetation more than two feet tall within 10 feet of structures** suggested in the draft regulations and the requirement that trees be **limbed up above the height of the roof and 10 feet away from the structure**

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and other trees would effectively eliminate trees for shade, aesthetics and habitat. In short, the rules would destroy a substantial part of our urban forest.

Many homes in denser areas of the State, including in Del Rey, are closer than 10 feet from each other, and the proposed rules would remove all aesthetic use of vegetation between homes through entire neighborhoods and result in dramatic reductions in local tree cover. This would cause neighborhoods to be hotter and more polluted, and cause residents to consume more energy and water, with no safety benefit.

Well-watered, well-maintained vegetation is not the problem. A 2023 scientific study of the Woolsey Fire (2018) found that vegetation zero to five feet from the structure had no influence on the likelihood of the structure surviving the fire,¹ A previous study of the Thomas fire (2017) reached a similar conclusion.

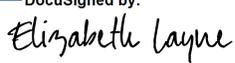
Please consider these factors, and the financial burden the Zone 0 regulations would place on California residents, and amend the proposed rule to allow more flexibility and give greater discretion for local officials to work with residents to take steps that are tailored to local conditions rather than a one-size-fits-all approach.

Although Del Rey is not in a mapped Fire Hazard Severity Zone, the rules could apply here because our Milton Street Park is managed by the Mountains Conservation Recreation Authority (MRCA) under a Joint Powers Agreement with the Baldwin Hills Conservancy.

Also, most of the fires in our community start when a fire in a homeless encampment gets out of control. In addition to the fires along Centinela Creek and Ballona Creek, we already have experienced a one-acre fire and a four-acre fire in the Ballona Creek Ecological Reserve, part of which is in Del Rey. Clearing vegetation would not change that risk.

Very truly yours,

DEL REY RESIDENTS ASSOCIATION

DocuSigned by:

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Elizabeth Campos Layne

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Mockrin, M. H., D. H. Locke, A. D. Syphard, and J. O'Neil-Dunne. 2023. Using high-resolution land cover data to assess structure loss in the 2018 Woolsey Fire in Southern California. *Journal of Environmental Management* 347:118960.

cc: (via e-mail)

- State Senator Lola Smallwood-Cuevas (Senator.Smallwood-Cuevas@senate.ca.gov)
- State Assemblymember Isaac Bryan (Assemblymember.Bryan@assembly.ca.gov)
- Jeff Khau, Planning Deputy, City Councilmember Traci Park, jeff.khau@lacity.org
- Matthew Halden, Del Rey Deputy, City Councilmember Traci Park, matthew.halden@lacity.org
- Del Rey Neighborhood Council, board@delreync.org
- Land Use and Planning Committee, Del Rey Neighborhood Council, landuse@delreync.org