

Communication from Public

Name: Sunshine Hill Residents Association

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Council File No: 25-1363

Comments for Public Posting: Please see the attached comments from Sunshine Hill Residents Association regarding the proposed Los Angeles Wildland-Urban Interface Code. We urge the Public Safety Committee to address the questions raised in our letter before advancing the ordinance, particularly regarding urban conflagration risk, structure-to-structure ignition, vegetation requirements, and LAFD's rulemaking authority.



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City of Los Angeles Public Safety Committee
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Date: September 15, 2026

Re: PUBLIC COMMENT — COUNCIL FILE 25-1363: Proposed Los Angeles Wildland-Urban Interface Code

Dear Chair and Members of the Public Safety Committee:

Sunshine Hill Residents Association represents a hillside community located within Los Angeles's Very High Fire Hazard Severity Zone. We strongly support effective wildfire safety measures, particularly home hardening, ember-resistant construction, improved access and evacuation planning, and measures addressing structure-to-structure ignition.

We have concerns, however, about advancing the proposed Wildland-Urban Interface Code without greater clarity regarding what Los Angeles is adopting and how these provisions will be implemented in our dense urban environment.

The City Attorney's report confirms that the proposed LAWUIC adopts not only the 2025 California Wildland-Urban Interface Code (CWUIC), but also portions of the 2024 International Wildland-Urban Interface Code (IWUIC). The report states that the City must adopt the CWUIC to carry out enforcement activities. It does not state that Los Angeles is required to adopt the additional provisions of the IWUIC.

Nor does the report identify which IWUIC provisions California did not adopt, what those provisions require, or why Los Angeles should adopt them. Before acting on the ordinance, the Committee should receive a side-by-side identification of those provisions and the justification for each.

More fundamentally, we urge the Committee to ask whether this regulatory framework adequately reflects what the City of Los Angeles learned from the Palisades Fire.

The ordinance describes the wildland-urban interface as the transition between unoccupied land and human development. Much of Los Angeles's VHFHSZ, however, consists of densely developed neighborhoods where homes may be separated by only a few feet. Once fire enters these communities, structure-to-structure ignition, building density, combustible attachments, wind-driven embers, road capacity and evacuation become critical determinants of loss.

Indeed, the ordinance's own findings recognize that abandoned vehicles during the Palisades Fire blocked roadways and interfered with firefighting operations.

The City Attorney states that the proposed LAWUIC will provide fire protection against wildfire conditions "unique to Southern California and Los Angeles." If that is the purpose of these local amendments, the Committee should understand how the ordinance addresses the conditions that actually distinguish Los Angeles — including dense development, close structure spacing, older housing stock, narrow hillside roads, evacuation constraints and the potential for structure-to-structure fire spread.

We therefore ask the Committee:

What provisions of this ordinance specifically address the urban-conflagration conditions demonstrated by the Palisades Fire, including structure spacing, structure-to-structure ignition, access and evacuation?

We are also concerned about the vegetation provisions carried into the new code. The ordinance identifies provisions titled "Landscape Vegetation," "Greater Fire Protection Measures," and "Additional Brush Clearance," yet characterizes these amendments as administrative. Requirements that determine what vegetation residents may retain or may be ordered to remove from private property can have substantial consequences and should not be treated merely as administrative matters.

This is particularly important as California implements new expanded fire hazard maps and proposes new Zone 0 regulations. The Committee should receive a clear explanation of how the proposed LAWUIC will interact with the new hazard zones Zone 0, existing Los Angeles brush-clearance requirements, Chapter 49 landscaping requirements, protected-tree regulations, and other applicable City requirements.

The ordinance also grants the Fire Chief authority to promulgate rules necessary to implement the article, with generally applicable rules authorized by the Board of Fire Commissioners. The Committee should clarify whether this authority could be used in the

future to impose new vegetation-removal or defensible-space requirements without returning to the City Council. If that is not the City's intention, the ordinance should say so.

Finally, the ordinance establishes a Fire Code Advisory Committee consisting of the Fire Marshal and representatives of industry, business and government selected by the Fire Chief. Because this code regulates landscapes and vegetation as well as structures, its advisory body should also include appropriate expertise in southern California wildfire science, ecology, urban forestry or horticulture, as well as representation from affected communities.

The City Attorney's report indicates that the draft ordinance was transmitted under Council Rule 38 to the Board of Fire Commissioners and the Los Angeles Fire Department. Given the ordinance's regulation of vegetation, land use implications, and the access and evacuation issues demonstrated by the Palisades Fire, we encourage the Committee to ask what review was conducted by City departments or advisory bodies with expertise in ecology, urban forestry, land use and emergency evacuation.

The City of Los Angeles needs a wildfire code designed for the City of Los Angeles. The Palisades Fire demonstrated that our risk cannot be understood solely through the traditional model of wildfire moving from wildland vegetation toward structures. In many Los Angeles neighborhoods, the structures themselves are the fire's fuel.

We respectfully request that the Public Safety Committee obtain answers to these questions before advancing the ordinance and ensure that Los Angeles's WUI Code addresses the actual causes and pathways of loss in our urban fire environment.

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cc: Argyle Civic Association
Beachwood Canyon Neighborhood Association
Benedict Canyon Association
Brentwood Community Council
Brentwood Homeowner Association
Brentwood Hills Homeowners Association
Brentwood Park Property Owners Association
Crestwood Hills Association
Historic Garvanza Coalition
Garvanza Improvement Association

Laurel Canyon Association
Mount Washington Alliance
Mandeville Canyon Association
The Oaks Neighborhood Association
Pacific Palisades Resident Association
Sherman Oaks Homeowners Association
Studio City Residents Association
The Hillside Federation
The Community Forest Advisory Committee (CFAC)