



April 29, 2025

Via email: [PublicComments@bof.ca.gov](mailto:PublicComments@bof.ca.gov)

Zone Zero Regulatory Advisory Committee  
California Board of Forestry and Fire Protection  
Natural Resources Building  
715 P Street  
Sacramento, CA 95814

Re: Defensible Space Zone 0 and Trees/Vegetation

Dear Committee Members:

This letter offers comments on the April 7, 2025 draft of the Zone 0 regulations proposed to be established under Public Resources Code Section 4291.

Palisades Forestry Committee (PFC) was formed in 2019 to facilitate the planting of trees in public spaces in Pacific Palisades, such as in public parks, schools, and street parkways. We also aim to protect the existing trees in our Palisades urban forest and to educate the public on the benefits of our trees. After the devastating Palisades wildfire, PFC has sought to educate government agencies and the community about protecting and saving charred trees that are resilient and healthy enough to survive and grow. We are a California public benefit corporation, a nonprofit under IRS Code Section 501(c)(3).

Palisades Forestry Committee members witnessed the January 7<sup>th</sup> loss of more than 5,500 residences in Pacific Palisades, a suburban neighborhood of the City of Los Angeles, due to a wildfire that started in the native coastal chaparral, but quickly became an urban holocaust fire, moving by 80mph wind-blown embers from house to house. We have seen that the Palisades urban forest, our neighborhood trees, not only survived far better than the homes, but also protected homes.

The high moisture content of the trees made them more resilient to fire than the low moisture content of houses. Many of the trees acted as a fire break by catching the embers, letting them fall to the ground, and by directing the wind to push the embers up and over the trees and homes. The residential destruction was due to the extremely high wind blowing embers over blocks at a time, with houses being the fuel, not the trees or vegetation. This was an urban fire, not a forest fire.

This observed anecdotal evidence is supported by the scientific evidence presented in the April 26, 2025 letter to the Zone 0 Regulatory Advisory Committee (“Committee”) by Travis Longcore, Ph.D., Catherine Rich, J.D., M.A., Jan C. Scow, Registered Consulting Arborist, and Alessandro Ossola, Ph.D. (“Longcore letter”). PFC urges the Committee to carefully read that Longcore letter’s science-based evidence and implement the letter’s recommendations.

The Longcore letter cites “proximity to the nearest structure is the strongest predictor of loss,” and “vegetation around buildings explained very little about probability of structure loss,” from studies of Santa Monica Mountain fires. The Palisades homes are not country homes in a forest, but rather suburban tracts of houses in close proximity. Zone 0 would eliminate most or all trees and vegetation between homes. Smaller homes on smaller lots would become rock gardens, at the expense of the homeowners who can least afford the cost of relandscaping.

The proposed virtual clearing of trees and shrubs within Zones 0 and 1 goes against a more balanced approach of “ember-resistant” landscaping, not total “non-combustible” landscaping. High moisture trees and shrubs that are irrigated and well maintained are less likely to ignite house after house, but rather in this fire the houses more likely ignited the trees and shrubs. “Removing healthy trees around structures increases the uninterrupted flow of embers in wind driven fire conditions and the subsequent accumulation of embers downwind at structures and therefore represents an increased, not decreased, risk.” (Longcore letter)

The AB 3074 legislation shows the legislature’s intent for a more flexible and balanced approach to vegetation around homes, “for regionally appropriate vegetation management suggestions that preserve and restore native species that are fire resistant or drought tolerant, or both, minimize erosion, minimize the spread of flammable nonnative grasses and weeds, minimize water consumption, and permit trees and shrubs near homes for shade, aesthetics, and habitat.”

The proposed regulations are inconsistent with that intent, threatening a negative impact “with a loss of tree and shrub cover ... biodiversity, temperatures, humidity, erosion, water quality, public health outcomes, and loss of personal security.” In addition, there’s the loss of the natural beauty of our neighborhood gardens and the mental peace they offer. **Balance and flexibility, based on science, should be the watchwords.**

This one-size-fits-all approach will have unintended negative consequences. The California Environmental Quality Act requires the least damaging environmental alternatives. The Longcore letter offers several less damaging alternatives to the overreaction of the proposed regulations. Palisades Forestry Committee supports those recommendations.

Pacific Palisades has lost too many homes and trees, and we don't want to lose more of the surviving trees to overreaching regulation. Many of the charred surviving trees are showing new growth and spring flowers. We need those signs of hope and resilience.

Respectfully submitted,

Palisades Forestry Committee

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