



PACIFIC PALISADES COMMUNITY COUNCIL

May 6, 2025

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

Via email: PublicComments@bof.ca.gov

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.

Pacific Palisades Community Council (PPCC) has since 1973 been the voice of Pacific Palisades – the community that was devastated by the massive Palisades Fire. Our community is located in an urban wildlands area of Los Angeles, in the foothills of the Santa Monica Mountains, and entirely within the designated Very High Fire Hazard Severity Zone (VHFHSZ).

As we begin the monumental task of rebuilding Pacific Palisades, we recognize the need for sensible, science-based regulations to create a defensible space and in turn prevent the unprecedented devastation experienced in January 2025. We appreciate the work of the Zone Zero Regulatory Advisory Committee (Advisory Committee) in proposing regulations and seeking public input.

We also seek to preserve our beautiful urban forest, to the maximum extent possible and consistent with public safety. Many trees and other landscaping emerged intact from the Palisades Fire; based on experience, we believe much of this vegetation was critical in preventing structure destruction. Community members are very concerned that adoption of the current proposed regulations would effectively result in a barren landscape with little or no protection for homes.

For these reasons, PPCC supports the comments set forth in the following letters submitted to the Advisory Committee: Letter from the Palisades Forestry Committee (PFC)¹ dated April 29, 2025 (PFC Letter); Letter from Dr. Travis Longcore / The Urban Wildlands Group dated April 26, 2025 (Longcore Letter).

We strongly agree with the conclusions expressed in both letters: that AB 3074 demonstrates the legislature's "intent for a more flexible and balanced approach to vegetation around homes," and further, that "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.**" (original emphasis; PFC Letter, p. 2)

¹ The PFC began as a committee of PPCC and is now a respected, independent non-profit and an organizational member of the PPCC Board.

Moreover, we concur with the conclusion of both the PFC and The Urban Wildlands Group that a “one-size-fits-all” approach to the regulations is inappropriate: “An urban area in chaparral vegetation should not be treated the same as a rural setting in a coniferous forest—the strategies to reduce fire risk are not the same and the risks are inherently different.” (Longcore Letter, p. 6). Or, as the PFC explains: “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.” (PFC Letter, p. 2)

PPCC therefore respectfully urges Advisory Committee members to reconsider the current proposed Zone 0 regulations, and in doing so take into account the scientific data that supports retention of healthy, hydrated trees and other vegetation near homes in urban wildlands areas to prevent fire damage.

This letter was approved by the PPCC Board after full discussion at a public special Board meeting on May 5, 2025, in accordance with PPCC’s Bylaws.

Thank you for your consideration of this important matter.

Respectfully submitted,

Sue Kohl

Sue Kohl
President
Pacific Palisades Community Council

cc (via email):
Hon. Ben Allen, SD 24
Hon. Jacqui Irwin, AD 42
Hon. Traci Park, CD 11