

PPCC Wildfire Resilience Advisory Task Force

Comments on the Draft AECOM Long-Term Recovery Plan (LTRP): Wildfire Resilience Implementation Priorities

The Wildfire Resilience Advisory Task Force (WRATF) appreciates the opportunity to comment on the Long-Term Recovery Plan (LTRP). These recommendations are intended to help translate the Plan into a practical, actionable wildfire-resilience program for Pacific Palisades and similarly situated communities located within Very High Fire Hazard Severity Zones (VHFHSZs).

The LTRP establishes an important framework for wildfire resilience and identifies several valuable initiatives, including infrastructure upgrades, home hardening programs, intergovernmental coordination efforts, defensible-space initiatives, and development of a Community Wildfire Protection Plan (CWPP). Relevant projects include RSF 1,2,4, and 6 initiatives.

The Plan appropriately recognizes the need to:

- Consolidate wildfire-resilience information for residents
- Improve public education regarding insurance and risk reduction
- Support home hardening and defensible-space compliance
- Coordinate fuel-management efforts across jurisdictions and landowners
- Strengthen enforcement of existing wildfire-safety regulations

Our comments, prepared under a very tight timeline, focus on implementation measures that can be funded through City-led resources and deployed quickly to improve neighborhood-scale wildfire resilience following the January 2025 fires. We anticipate providing additional comments and recommendations as the City's plans continue to develop and more details become available.

Given the urgency of recovery in Pacific Palisades, the City should move beyond broad resilience principles as quickly as possible by establishing timelines, requiring public reporting, and distinguishing actions that can be implemented immediately from those requiring further study or coordination.

Wildfire resilience is no longer solely a public-safety issue. It is now directly tied to insurance availability, mortgage access, property values, rebuilding feasibility, and long term economic recovery. Accordingly, the City's implementation strategy should prioritize practical measures that reduce wildfire risk while also demonstrating to insurers, lenders, residents, and public agencies that Pacific Palisades is pursuing a credible and coordinated resilience program.

For ease of review, these comments begin with an executive summary of priority recommendations, followed by detailed topic-specific analysis and supporting rationale.

Executive Summary – Wildfire Resilience Advisory Task Force Recommendations

Key Recommendations (Cross-Referenced) 1. Education Alone Cannot Reduce Conflagration Risk; Public Guidance Must Come from the City

The City should not rely heavily on education-only programs, such as the Los Angeles Wildfire Resilience Alliance, MySafeLA, Ready, Set, Go!, Firewise USA®, or related efforts, to reduce urban-conflagration risk. Public guidance should come directly from a trusted, official City source, not from a nonprofit organization, even one affiliated with or partnered with the City or LAFD.

References: RSF 1, pp. 67–68; RSF 6, pp. 203–204; Commentary Section 1.

2. Adopt Clear, Enforceable VHFHSZ Standards and a High-Risk Vegetation Framework

The City should adopt clear, enforceable defensible space standards and a high-risk or prohibited plant guidance. Standards should be practical for homeowners and professionals, aligned with applicable State and County guidance, and credible to insurers, lenders, and residents.

References: RSF 6, p. 206; Commentary Section 2.

- 3. Prioritize Enforcement Through the Brush Clearance Collaboration Project** The City should fund and staff inspection and enforcement capacity for both public and private VHFHSZ parcels, prioritize the highest-risk properties first, publicly report inspection and compliance data, and establish a clear escalation process for violations.

References: RSF 6, pp. 203–207; Commentary Section 3.

4. Require Home Hardening During Major Remodels, Rebuilds, and Exterior Upgrades

The City should use major remodels, rebuilds, and substantial exterior upgrades as trigger points for targeted, lower-cost home-hardening compliance, such as hardened vents or gutters, that might not otherwise fall within the scope of a remodel, rebuild or upgrade. When owners replace roofs, windows, vents, siding, decks, fences, gates, or other exterior components, those upgrades should meet current wildfire-resilience standards. The City should expand grants, incentives, and recovery funds to support both homeowners rebuilding after the fire and owners of older homes throughout the Palisades who complete high-impact home-hardening upgrades. Incentives should be tied to verifiable standards, such as IBHS Base, IBHS Plus, or a stronger applicable standard.

References: RSF 6, p. 207; RSF 4, p. 130; Commentary Section 4.

5. Require Wildfire-Specific Training and Accountability for Professionals

The City should require wildfire-specific training for architects, contractors, landscapers, arborists, gardeners, roofers, and other residential professionals working in VHFHSZs. Professionals who repeatedly submit noncompliant plans, perform noncompliant work, or ignore wildfire-safety requirements should face meaningful consequences.

References: Commentary Section 5.

6. Launch a Block-Scale Wildfire Resilience Pilot Program

The City should redirect attention from insurance education alone toward one or more block-scale wildfire resilience pilots. A pilot could test whether applying a common standard, such as IBHS guidance, across a block, HOA, or neighborhood cluster can support future insurability and insurance affordability.

References: RSF 4, pp. 128–129; Commentary Section 6.

7. Strengthen Red Flag Day and Ignition-Prevention Measures

The City should re-evaluate Red Flag streets, apply heightened ignition-prevention rules consistently across the Santa Monica Mountains fire environment, restrict high-risk activities during Red Flag days, improve monitoring at trailheads and open-space interfaces, and evaluate school-related traffic protocols where evacuation could be impaired.

References: RSF 1, pp. 58–60; Commentary Section 7.

8. Prioritize and Fund Cross-Jurisdictional Fuel Treatment

The City should fund and implement cross-jurisdictional fuel treatment across public, agency-managed, conservancy, utility, park, HOA, and private lands. The LTRP should require an urgent, immediate interagency fuel-treatment matrix identifying priority areas, responsible agencies, funding sources, timelines, barriers, and public reporting mechanisms.

References: RSF 6, pp. 200–207; Commentary Section 8.

9. Ensure Safe Evacuation by Managing Corridor Vegetation

The City should expand the Palisades Neighborhood Tree Inventory and Species Guidance Project to address vegetation along evacuation corridors. Evacuation routes should be treated as critical public-safety infrastructure, with inspection and maintenance standards for trees, hedges, brush, debris, and overhead-line conflicts.

References: RSF 6, pp. 208–209; Commentary Section 9.

10. Support Hyperlocal and Alternative Water Systems

The City should support supplemental water systems, including onsite cisterns, rainwater harvesting, water tanks, pool-pump integration, public water reserves, HOA/Rec Center Pools and a registry of available sources. Standards should address access, reliability, backup power, maintenance, hose connections, and fire-agency coordination.

References: Commentary Section 10.

11. Permit and Establish Clear Rules for Private Firefighting Resources

The City should allow certified, regulated, and insured private firefighting resources in VHFHSZs, provided they are clearly subordinated to public incident command. Clear standards should define when private resources may enter, remain, or be excluded, while preventing interference with public responders, evacuation routes, or critical water supply.

References: Commentary Section 11.

12. Evaluate Setbacks, Voluntary Buyouts, Parcel Consolidation, Open Space, and Buffer Zones

The City and County should evaluate long-term land-use tools where rebuilding would recreate extreme risk, including increased setbacks, voluntary buyouts, parcel consolidation, footprint reduction, permanent open space, and managed buffer zones. References: Commentary Section 12.

13. Ensure HOAs Do Not Obstruct Wildfire Compliance

HOA rules, architectural guidelines, and landscape restrictions should not discourage, delay, or block lawful wildfire-safety work. Private governance should not be allowed to defeat the public-safety purpose of state or local wildfire standards. References: Commentary Section 13.

14. Require Public Town Halls and Progress Reporting

AECOM and the City should hold a public town hall to explain what will materially change before the next fire season. The City should also hold annual pre-fire-season town halls so residents understand homeowner obligations, Red Flag restrictions, vegetation-management requirements, enforcement priorities, available City resources, and what the City will do to reduce preventable wildfire risk. References: Commentary Section 14.

Commentary on Key Implementation Items

City Guidance, Standards, and Enforcement

1. Education Alone Cannot Reduce Conflagration Risk; Public Guidance Must Come from the City

The LTRP identifies the Los Angeles Wildfire Resilience Alliance (RSF 1, pp. 67–68) and the Community Wildfire Protection Plan (RSF 6, pp. 203–204) as partially or fully funded projects with short- to medium-term timelines. Both rely heavily on MySafeLA, a private nonprofit partnered with LAFD, and promote programs such as Ready, Set, Go!, Firewise USA®, and CAL FIRE/Fire Safe Council/Fire Safe Palisades efforts.

While these programs support public education and engagement, which we are all in favor of, they cannot compel the coordinated, neighborhood-wide action required to reduce urban conflagration risk. Years of such efforts have not made the community less vulnerable. Public guidance must come from a trusted, official government source that can issue enforceable California, City, and County requirements—something a private nonprofit cannot do, even in partnership with LAFD.

In discussing the Home Hardening Retrofit Project (RS4, p. 130), the LTRP highlights the “herd immunity” benefit that arises “[b]y concentrating resiliency improvements across a cluster of homes,” reflecting that wildfire resilience is increasingly being considered in a collective, neighborhood-scale context. The exact level of “immunity” needed for meaningful risk reduction remains uncertain, but current evidence suggests the threshold is quite high. For example, IBHS’s Wildfire Prepared Neighborhood Standard—which certifies entire neighborhoods—demonstrates that effective neighborhood-scale wildfire resilience requires broad, coordinated compliance rather than isolated voluntary action. Its requirements include community-wide standards and high compliance thresholds, some effectively at or above 90%, depending on the measure.

The experience of WRATF members—many active in Firewise and working alongside MySafeLA—shows that education and outreach alone have achieved limited success in changing behavior, particularly at the scale needed for meaningful community-wide resilience. Without enforceable citywide or countywide standards, incentives, and inspection, consistent adoption is unlikely. As with other public-safety measures, such as seatbelt use and smoking limitations, widespread compliance typically depends on legislation and enforcement to establish a clear, consistent baseline—a principle that applies equally to wildfire resilience.

Before allocating limited resilience funding to wildfire-education initiatives, the City should evaluate whether these programs have measurably increased home hardening, vegetation management, or neighborhood-level compliance. If not, funds would be better spent on City-led guidance, inspections, enforcement, and actions that produce verifiable results.

Make no mistake, the LAFD and City should continue to support outreach and education but in the absence of a fuller plan outlined in this document, we believe that the emphasis and reliance on education only is not at all sufficient.

Furthermore, based on the LTRP’s Community Wildfire Protection Plan (“CWPP”) (RSF 6, pp. 203–204), it appears that the principal written document outlining the overall wildfire resilience strategy for the City at large and the Pacific Palisades, including evacuation planning, mitigation

priorities, and interagency coordination, is to be prepared by MySafeLA, primarily in coordination with LAFD. Given the significance of this document, it should be broadly circulated for public review and expert vetting well in advance of adoption. While outside expertise can play an important supporting role, under the current draft LTRP, the CWPP would effectively serve as the City's foundational wildfire resilience and evacuation planning document and therefore warrants public scrutiny and ultimately approval and issuance by the City Government as the authoritative report on wildfire resiliency.

2. The City Must Adopt Clear, Enforceable VHFHSZ Standards Along with a High-Risk Vegetation Framework

The LTRP notes that the "City is currently in the final stages of adopting the LA Fire Code and the Los Angeles Wildland-Urban Interface Code" (LTRP, p. 206), which is an important step toward consistent wildfire standards. We are encouraged by these updates. Because the final details are not yet available, we offer preliminary observations on how the code can be structured to be clear, enforceable, practical for homeowners, and effective in reducing neighborhood-scale wildfire risk in VHFHSZs.

Homeowners in the Santa Monica Mountains currently face overlapping and sometimes conflicting wildfire requirements from state codes, local amendments, IBHS guidance, and insurance standards. Residents, contractors, architects, landscapers, inspectors, and lenders should not have to reconcile advice from multiple nonprofits, volunteer groups, or other organizations. To be effective, the City's approach must be clear, enforceable, authoritative, and aligned with County wildfire-safety guidance, ensuring that similarly situated properties in the Santa Monica Mountains are subject to consistent standards.

The code should produce measurable, neighborhood-scale risk reduction that is credible to insurers, lenders, and residents, while remaining practical to understand, implement, and enforce. The ability to obtain and afford homeowners insurance increasingly depends on neighborhood-level wildfire risk. Without clear and enforceable standards, residents may be forced into the California FAIR Plan or lose access to affordable coverage altogether, affecting rebuilding, mortgage availability, property values, lender confidence, and the City's long-term tax base. Conversely, if FAIR Plan coverage is available regardless of whether homeowners undertake meaningful home hardening or defensible-space measures, residents may have little financial incentive to reduce risk, leaving the broader community more vulnerable.

The LTRP should therefore identify mitigation measures that show Pacific Palisades is pursuing a credible, coordinated, enforceable resilience strategy with measurable results. It should clearly define what is mandatory; what is recommended as best practice; and how those standards will be inspected and enforced.

The exact terms of any ordinance or code amendment should be subject to further evaluation, public discussion, and community input.

The City should clarify that defensible space is measured from any building or structure, not only from a building owned by the homeowner whose vegetation is being regulated. If vegetation on one parcel falls within the defensible-space zone of a neighboring building or structure, the owner of that vegetation should be responsible for removing, spacing, pruning, or maintaining it so that it does not compromise the neighboring property's required defensible space. This clarification is essential in dense neighborhoods where vegetation on one parcel may affect the fire safety of a neighboring structure.

Additional code updates should move new and existing vegetation toward the same protective standard over time.

The City should further adopt a clear high-risk and prohibited plant framework for residential VHFHSZs, modeled on or informed by Ventura County Fire Department Guideline 410. The framework should identify which high-risk or prohibited species should not be planted going forward, which existing plants or hazardous conditions require removal, and which may remain only with strict maintenance, especially within 30 feet of a structure or near native chaparral.

Where removal is not required, the City should define what maintenance requires, including pruning, thinning, dead-material removal, litter cleanup, spacing, irrigation, and inspection frequency. Homeowners should not be left guessing what it means to “maintain” high-risk vegetation such as dense hedges, palms, junipers, cypress, eucalyptus, acacia, or other plants that accumulate combustible material.

3. The Brush Clearance Collaboration Project Must Prioritize Enforcement

The Brush Clearance Collaboration Project (RSF 6, pp. 203–207) highlights the need to pursue funding to expand LAFD inspection capacity.

Such funding is critical to wildfire resilience. A wildfire standard is meaningful only if it is funded, inspected, and enforced. As soon as possible, the City should publish a staffing and funding analysis identifying the enforcement personnel needed for annual coverage of all residential VHFHSZ parcels.

LAFD should inspect all covered residential parcels, with highest-risk properties inspected first. Priority should include steep slopes, canyon areas, repeat violators, parcels adjacent to unmanaged vegetation, evacuation corridors, areas beneath or adjacent to overhead utility and communication lines, and neighborhoods with elevated ember exposure or structure-to-structure ignition risk.

The City should also ensure inspection of City-controlled, public, agency-managed, and conservancy lands adjacent to residential VHFHSZ communities, including open-space edges, canyon rims, slopes, evacuation corridors, parks, trailheads, and utility corridors. Findings should be public and should identify hazards, responsible agencies or landowners, required corrective actions, timelines, and follow-up status.

The City should publicly report inspection and enforcement data by neighborhood or battalion, including parcels inspected, violations found, follow-up enforcement, correction rates, and how compliance was verified.

The City should identify funding sources, including inspection fees, permit-related fees, special assessments, grants, resilience funds, recovery funds, and other legally available financing tools.

Enforcement should fully follow a clear escalation ladder permitted by law: notice, correction deadline, re-inspection, citation, escalating fines, abatement order, City-performed abatement with cost recovery, and permit consequences for serious or repeated violations.

4. The City Should Require Home Hardening During Major Remodels, Rebuilds, and Exterior Upgrades

The Brush Clearance Collaboration Project (RSF 6, p. 207) identifies the need to “[e]xplore possibility of expanding current fire safety regulations to include home hardening requirements.”

The City should make this recommendation operational by using major remodels, rebuilds, and substantial exterior upgrades as natural trigger points for targeted, lower-cost home-hardening compliance, such as hardened vents or gutters, that might not otherwise fall within the scope of a remodel, rebuild or upgrade. When owners are already replacing roofs, windows, vents, siding, decks, fences, gates, or other exterior components, those upgrades should meet current wildfire-resilience standards. This is time critical as rebuilds are progressing now and current code does not meet current wildfire-resilience standards.

For new exterior walls, fences, and gates in VHFHSZs, the City should require noncombustible or ignition-resistant materials, including three-coat stucco, fiber-cement siding, or metal siding for walls, and metal, concrete, stone, brick, or fiber cement for fences and gates.

LADBS plan check and final inspection should verify that required measures are included in the plans and installed in the field. This approach allows the City to gradually improve the existing housing stock without relying solely on voluntary retrofits.

The Home Hardening Residential Retrofit Project (RSF 4, p. 130) proposes “rebates to homeowners located in the burn scar to support the implementation of wildfire-hardening structural retrofits and the creation of defensible space.” This program is important, but it is defined too narrowly.

The City should use grants, incentives, and recovery funds to support both homeowners rebuilding after the fire who face a gap between reconstruction costs and insurance proceeds, and owners of older homes throughout the Palisades who complete high-impact home hardening upgrades. Eligible work should include ember-resistant vents, Class A roofing, ignition-resistant siding, enclosed eaves, tempered glazing, noncombustible materials, defensible-space improvements, and high-risk vegetation removal and replacement to low-risk vegetation.

Incentives should be tied to verifiable standards, such as IBHS Base, IBHS Plus, or a stronger applicable standard, so public funds produce measurable safety benefits and help reduce neighborhood-scale wildfire risk.

5. The City Should Require Wildfire-Specific Training and Accountability for Professionals

The City should make clear that wildfire-safety compliance in VHFHSZs is mandatory, not discretionary, and that professionals working in these areas are responsible for understanding and applying applicable fire-safety requirements.

The City should require wildfire-specific continuing education for architects, contractors, landscapers, arborists, gardeners, roofers, and other residential professionals working in VHFHSZs. Training should address Chapter 7A, the California WUI Code, IBHS Wildfire Prepared Home standards, defensible space, vegetation management, ember exposure, structure-to-structure ignition, and Red Flag day ignition prevention.

The goal should be not only technical code compliance, but also a practical understanding of how individual design, construction, and maintenance decisions affect neighborhood-scale wildfire risk.

Professionals who repeatedly submit noncompliant plans, perform noncompliant work, or ignore applicable wildfire-safety requirements should face meaningful consequences, including permit delays, correction requirements, discipline, referral to licensing authorities, or other enforcement

measures. Compliance should be treated as a baseline professional obligation, not as an optional best practice.

Insurance and Neighborhood-Scale Implementation

6. Launch a Block-Scale Wildfire Resilience Pilot Program to Support Future Insurability and Insurance Affordability

The LTRP's proposed short-term, unfunded Insurance Education Project (RSF 4, pp. 128–129) is well-intentioned, but the primary challenge is not lack of homeowner education; it is underlying wildfire risk and the structural limits of the insurance market. Education alone will not materially improve insurability for at-risk properties. Limited resources would be better directed toward projects that reduce wildfire risk and support compliance with enforceable VHFHSZ standards, including one or more block-scale wildfire resilience pilots.

A pilot could test whether applying a common standard, such as IBHS guidance, across a defined block, HOA, or neighborhood cluster can help support future insurability and insurance affordability. Because a successful pilot would require coordination of standards, financing, technical guidance, resident participation, and measurable outcomes, the City should identify an appropriate department, office, or dedicated wildfire-resilience lead to support implementation. In the near term, the Mayor's Office could support homeowner-funded pilot efforts through technical assistance, coordination, and other available City resources, allowing volunteer organizations, community groups, and local businesses to organize willing residents and test a practical model while larger funding structures are still being developed.

Red Flag Day and Ignition Prevention

7. Strengthen Red Flag Day and Ignition-Prevention Measures

Current Red Flag streets in the Palisades should be reevaluated with particular attention to known evacuation routes, additional routes identified through modeling, and smaller hillside streets that may present access, congestion, or evacuation challenges during a wildfire.

Red Flag day and other heightened ignition-prevention rules should apply consistently across communities sharing the same Santa Monica Mountains fire environment. Residents, contractors, and professionals should face the same expectations regardless of City or County boundaries when exposed to similar fuels, wind conditions, slopes, ember risk, and neighborhood-scale fire-spread hazards.

The City should clearly communicate restrictions and best practices to homeowners, licensed contractors, and other professionals through alerts, mailers, permit notices, online materials, public media, and contractor education. Guidance should distinguish legal requirements from best practices, so residents and professionals understand both obligations and public-safety expectations during extreme fire weather.

High-risk activities on Red Flag days should be restricted as necessary to protect public safety. These include hot work, grinding, cutting, welding, spark-producing power-tool use, smoking, open flames, debris handling, parking over dry vegetation, and temporary storage of combustible materials near structures or vegetation.

Ignition prevention should also include targeted monitoring at high-risk trailheads, canyon access points, and open-space interfaces. Measures may include cameras, signage, patrols,

enforcement, vegetation management, emergency access planning, and temporary trailhead closures on Red Flag or Particularly Dangerous Situation days.

Violations should carry meaningful consequences, including stop-work orders, substantial fines, permit restrictions, contractor discipline, and enhanced penalties for repeat or willful offenses. Even one preventable ignition on extreme-fire-weather days can threaten entire neighborhoods.

The LTRP's Operational Evacuation Strategies Project (RSF 1, pp. 58-60) contemplates targeted engagement with schools to improve evacuations. As part of this project, the City and LAUSD should evaluate Los Angeles County practices for schools, including closures or remote learning on Red Flag days, particularly where school-related traffic could impair evacuation or emergency responder access.

Community and Infrastructure Protection

8. Prioritize and Fund Cross-Jurisdictional Fuel Treatment

The Wildland-Urban Interface Fire Risk Reduction Intergovernmental Coordination Project (RSF 6, pp. 200–202) and the Brush Clearance Collaboration Project (RSF 6, pp. 203–207) correctly recognize that wildfire risk in the Palisades must be addressed across public, agency-managed, conservancy, utility, park, HOA, and private lands. The Santa Monica Mountains function as one connected fire environment, and fire risk does not stop at jurisdictional or property boundaries.

These projects should be treated as urgent implementation priorities. Both projects remain unfunded, and only the Brush Clearance Collaboration Project is currently active.

The City should lead first on lands it owns, manages, or controls, including open-space edges, canyon rims, slopes, parks, rights-of-way, evacuation corridors, utility-adjacent areas, and other City-controlled lands that expose residential VHFHSZ neighborhoods. Interagency coordination should not delay action on City-controlled lands or other clearly identified high-risk areas where ownership, authority, and treatment responsibility are already known.

For lands outside exclusive City control, the LTRP should require an urgent interagency fuel treatment matrix identifying priority areas, ownership or jurisdiction, lead and participating agencies, recommended treatment, funding source, maintenance obligation, implementation timeline, barriers to action, and a public reporting mechanism.

Priority should be given to areas where treatment can produce the greatest community-wide safety benefit before the next fire season, including canyon rims, ridgelines, evacuation corridors, utility corridors, WUI edges, burned slopes, open-space interfaces, parks, undeveloped parcels, and lands directly exposing residential neighborhoods.

9. Ensure Safe Evacuation by Managing Corridor Vegetation

The Palisades Neighborhood Tree Inventory and Species Guidance Project (RSF 6, pp. 208–209) focuses on managing the urban tree canopy. This project should be expanded to explicitly address vegetation along evacuation corridors.

Evacuation corridors are critical public safety infrastructure, not just roadways. In a wind-driven fire, fallen trees, overhanging limbs, dense roadside vegetation, combustible debris, overhead utility conflicts, and post-storm hazards can block residents from evacuating and prevent emergency responders from entering.

The City, in coordination with the County where appropriate, should:

1. Identify primary and secondary evacuation routes in VHFHSZ communities.
2. Establish inspection and maintenance standards for trees, hedges, brush, combustible vegetation, debris, and overhead-line conflicts along those routes.
3. Apply these standards to both public and private property wherever vegetation or debris could compromise evacuation safety.

A defensible home is not sufficient if the road out is blocked; evacuation routes must be kept passable and protected as critical public-safety infrastructure.

10. Support Hyperlocal and Alternative Water Systems

The City should support hyperlocal and alternative water systems—such as onsite cisterns, rainwater harvesting, water tanks, pool-pump integration, public water reserves, and a registry of available sources—with standards for access, reliability, backup power, maintenance, hose connections, and fire-agency coordination. Public lands, parks, trailheads, and strategic open space locations near VHFHSZs should be evaluated for accessible emergency cisterns or other fire-resilient water sources, especially where municipal supply, access, or firefighting capacity may be constrained.

The City should also evaluate ordinances or liability protections to allow LAFD and other agencies to use private pumps, pool water, cisterns, tanks, and other supplemental sources during wildfire emergencies. Clear rules would define access, protect all parties, and give firefighters confidence in relying on these resources when municipal supply or pressure is limited.

11. Permit and Establish Clear Rules for Private Firefighting Resources

The City should allow certified, regulated, and insured private firefighting resources in VHFHSZs, provided they are clearly subordinated to public incident command. Regulation should ensure safety and coordination, not prohibit qualified resources that can operate without interfering with public emergency response.

Certification should address training, equipment, insurance, communications, access, coordination with public agencies, and compliance with evacuation orders. Private firefighting resources must not interfere with LAFD, Los Angeles County Fire, or other public responders; obstruct evacuation routes; compete for critical water supply; impede access; or operate contrary to public incident command.

City rules should establish objective standards for when certified private resources may enter, remain, or be excluded from VHFHSZ properties. Legitimate safety concerns should be addressed through clear rules rather than blanket prohibitions where access can be provided safely and consistently with incident command.

Long-Term Land Use and Risk Reduction

12. Evaluate Setbacks, Voluntary Buyouts, Parcel Consolidation, Open Space, and Buffer Zones

The City should evaluate increased setback requirements in VHFHSZs to reduce structure-to-structure ignition risk over time. Where lot size allows, especially on larger parcels, rebuilds, major remodels, additions, and new accessory structures should increase separation from neighboring structures, reduce radiant-heat exposure, and create more defensible space.

The City and County should also evaluate voluntary buyouts, parcel consolidation, footprint reduction, permanent open space, and managed buffer zones where rebuilding would recreate extreme risk, especially where these tools would reduce exposure to adjacent neighborhoods, evacuation corridors, or wildland fuels.

13. Ensure HOAs Do Not Obstruct Wildfire Compliance

HOA rules, architectural guidelines, and landscape restrictions should not discourage, delay, or block lawful wildfire-safety work. In VHFHSZs, aesthetics should not override fire safety when homeowners seek to remove hazardous vegetation, create defensible space, harden structures, replace flammable landscaping, or install code-compliant fire-resilient walls or fences.

California has already recognized this principle in another context. Under the State's solar-rights policy, HOAs may impose reasonable restrictions on solar energy systems, but they may not use private covenants, architectural review, or aesthetic objections to prohibit solar installations or impose restrictions that significantly increase cost or reduce performance. The same policy logic should apply to wildfire resilience: private governance should not be allowed to defeat the public-safety purpose of state or local wildfire standards.

Communication and Accountability

14. The City Should Require Public Town Halls and Progress Reporting

The Task Force recommends that AECOM and the City hold a public town hall to explain what will materially change before the next fire season. The town hall should address implementation timelines, staffing commitments, enforcement procedures, public guidance, responsible agencies, funding needs, and near-term actions already underway.

The City should also hold an annual pre-fire-season town hall for residents in VHFHSZ neighborhoods. This meeting should provide practical guidance on homeowner obligations, Red Flag day restrictions, vegetation-management requirements, evacuation planning, enforcement priorities, available City resources, and any changes in applicable rules or best practices.

The purpose should be straightforward: before each fire season begins, residents should understand what they are expected to do, what the City will do, and what will be different on the ground in actual prevention operations, enforcement, homeowner expectations, and public safety conditions.

Conclusion

The Task Force appreciates AECOM's work and the City's commitment to long-term recovery. These recommendations are intended to help move the LTRP from a broad resilience framework to an actionable program that can reduce future structure loss, improve evacuation safety, support insurability, and protect the long-term viability of residential communities in the Santa Monica Mountains.

The Palisades and similarly situated residential VHFHSZ communities need clear standards, enforceable rules, funded inspections, coordinated land management, and measurable implementation.

Thank you for your consideration.

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