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Sept. 16, 2025

Dear Board of Forestry:

We are writing to express concern over aspects over the proposed Zone Zero guidance (based on “August 2025 Zone 0 Rule Plead, 8-14 update”).

First, we wish to acknowledge the brave actions of local firefighters in defending our built and natural communities, and the difficult job Board of Forestry is performing in developing rules for vegetation management around homes. Our understanding of fire science and defensible space continues to evolve, and we appreciate the flexibility shown by the Board in developing these rules.

Background

The Resource Conservation District of the Santa Monica Mountains (RCDSMM) is a not-for-profit local government special district based in Calabasas that monitors endangered species like the steelhead trout, restores and enhances local creeks and oak woodlands, educates the public on wildfire resilience and safety, and leads environmental education programs for students and community members throughout our district and surrounding counties. Our mission is to inspire environmental stewardship throughout the communities we serve to conserve natural resources for future generations.

RCDSMM is a non-regulatory entity. We frequently act as a go-between for private landowners, residents, and public agencies. Established in 1961, we have been involved in many aspects of fire prevention and fuels/vegetation management in and around the Santa Monica Mountains, most recently establishing a network of trained evaluators to advise homeowners on home and yard fire risk via a “Home Ignition Zone” inspection program. We offer this perspective based on many years of living and working in high-fire zones in the Santa Monica Mountains and adjacent urban areas.

Research and firefighter input indicates that during an *urban* wildfire, the greatest risk of a house burning down is a neighbor’s burning house, and *not* vegetation. Thus, in consulting with homeowners, we emphasize home-hardening as a critical priority for wildfire resilience, with vegetation management an additional focus. Home-hardening includes measures like increasing structural resistance to radiant heat (multi-pane tempered glass windows, fire- resistant siding); establishing barriers to radiant heat

(such as a concrete wall between your house and your neighbor's); installing fire-safe mesh coverings on vents; keeping leaf litter off roofs and gutters, and trimming branches away from walls and roofs. We emphasize that ground-level landscaping in Zone Zero be *ember-resistant*, not that it be eliminated.

While we agree with the majority of recommendations in the (revised) Rule Plead, such as the elimination of wood fences, woodchip mulch, etc., we feel that ambiguity in what type of vegetation *is* allowed within Zone Zero (i.e., no trees, *except "specimen trees"*; no plants, *except small potted plants*) will lead to confusion by homeowners, insurance companies, and fire inspectors in terms of what – if any – residential landscaping around homes *is* permissible. Already (summer 2025), we are seeing residents removing healthy, cooling trees around houses within our district under the misguided belief this will preclude them being dropped by insurance companies, or because the Board of Forestry requires it.

While we recognize that dead and dry vegetation *can* catch embers, burn quickly, and lead to a house fire, much existing vegetation within Zone Zero could actually protect houses during a fire, both by physically catching embers, and by maintaining a cooler, wetter microclimate that prevents embers from starting fires. Research by numerous fire scientists supports this phenomenon, the results of which may be observed at many recent post-fire urban settings such as Pacific Palisades and Altadena, and even in rural communities such as Paradise. Here and elsewhere, rings of singed or even unburned vegetation survived around the remains of houses burned to the ground.

Area of Concern

Our primary concern here are those residential properties within the newly-mapped "High" fire risk zones, well away from the wildland edge/"WUI". These are places where – if a large fire occurs – it ceases to be a wildland fire and becomes an urban conflagration. Therefore, *urban*, not wildland, guidelines on vegetation management should apply. Neighborhoods in our district fitting this characterization include Chatsworth, Encino and Woodland Hills, as do nearby neighborhoods such as Silverlake, Highland Park, and El Sereno that lie within our Sphere of Influence.

Throughout this area, summer and fall temperatures frequently exceed 90°F well into October, a situation exacerbated by the Heat Island Effect. This heat can be deadly, and has been shown to contribute negatively to human health. It can, however, be mitigated by the "urban forest", the term for the tree canopy that has grown up around houses throughout the region. By blocking the sun's rays and shading walls and roofs, large trees and mature shrubs act as multi-purpose natural features – cooling homes,

reducing utility bills, as well as supporting some of the outstanding biodiversity found in this global biodiversity hotspot.

Examples of these neighborhoods from Google Earth images are shown below.

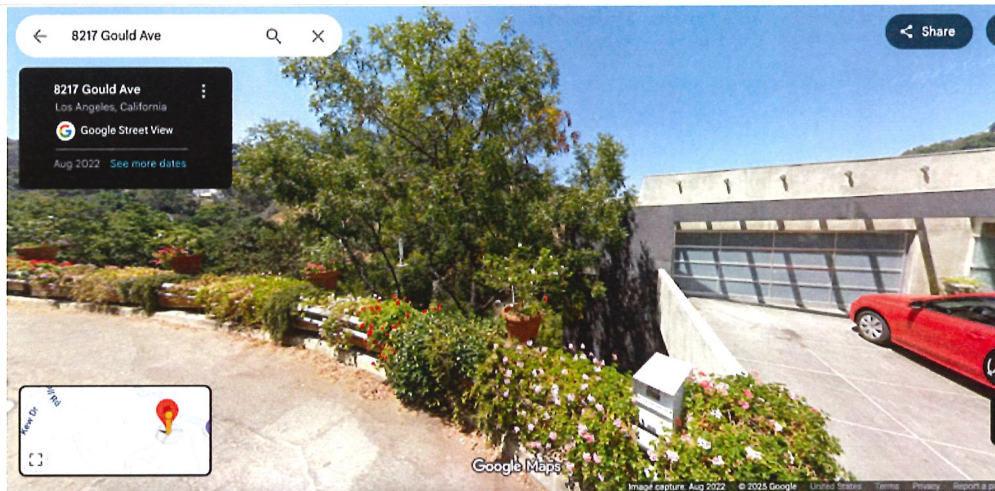


Figure 1a. Southern California black walnuts (CNPS Rank 4) adjacent to wildfire-hardened home, Laurel Canyon.

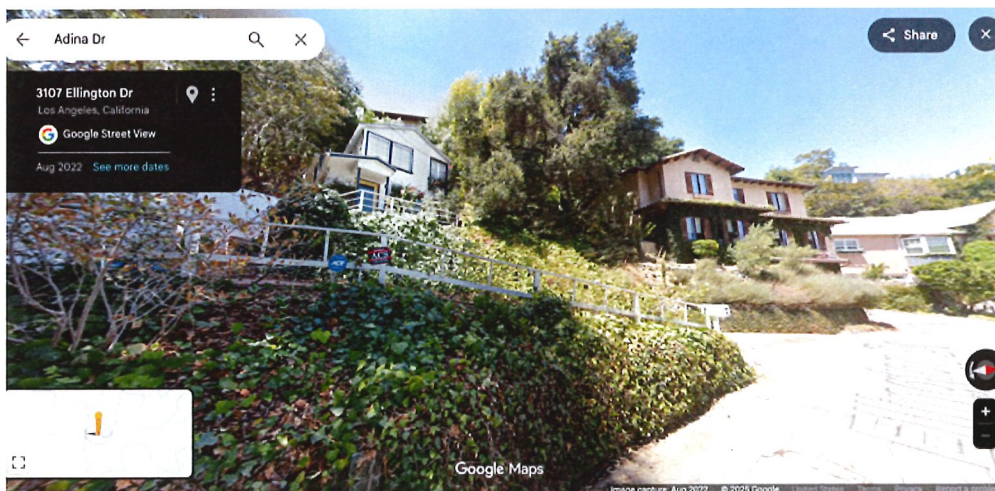


Figure 1b. Mature, healthy coast live oaks between two houses (note shade provided to house on right), Studio City.

RCDSMM considers this living canopy – as well as irrigated or otherwise well-maintained native plantings – part of an ignition-resistant defensible space strategy for the home, and for neighboring homes. For decades, we have worked to preserve the ecological value of this vegetation, which often provides the only natural habitat for native wildlife – such as Acorn Woodpeckers, bobcats, California sister butterflies and slender salamanders – for miles around. Indeed, many of the properties across our district, as well as those close to the urban core of Los Angeles, have very small setbacks from property lines and neighboring houses. Often, the *only* native vegetation in these neighborhoods are the scattered coast live oaks, black walnuts, and toyon located within Zone Zero.

Strict adherence to proposed Zone Zero rules could lead to the removal of essentially all ground-level vegetation in certain neighborhoods, as well as much of the shade.

Based on current science, this would not result in any reduction in fire risk; if anything, it would open up pathways to flying embers, particularly on windy days when catastrophic fires experience spread.

Recommendations

First, we recommend that a caveat be inserted that this rule *is not intended to remove mature, healthy native trees and shrubs* (which are protected in many municipalities by protected tree ordinances). As written, the ambiguity around what constitutes a “specimen tree” and what “limbing” refers to, would seem to leave open the possibility of removing such trees from Zone Zero.

We also recommend adding language *discouraging homeowners from trimming large limbs of trees* (e.g., >2”) within Zone Zero, as they pose a minimal fire risk, and doing so can seriously compromise or even kill an otherwise healthy tree, particularly those not tall enough to extend 5’ over a roofline. Again, under most municipal oak/protected tree ordinances, the trimming implied by the rule would be illegal, or would require a permit to perform.

Finally, we request that BoF consider properties surrounded by open space, “ranchettes” and other types of rural residential development subject to different vegetation management guidelines that acknowledge a completely different ecological setting than urban/built-out areas. *This distinction could be made using a minimum property size or zoning/density category the rule would apply to.*

We provide examples of specific wording changes (to the August 14, 2025 rule plead draft) below. Our edits are in red.

(b) Zone 0 Requirements:

(1) No landscaping materials that are likely to be ignited by embers are permitted within Zone 0. This includes, but is not limited to, fallen leaves and tree needles, weeds, and combustible mulches including bark and woodchips. Grass, ornamental or native plants, shrubs are permitted, ~~provided they do not contain dead material.~~

~~(A) Exception: Plants in pots are allowable if they are in areas that are not directly beneath, above, or in front of a window, glass door, or vent; are kept in an unaffixed, not combustible pot or container that is no larger than five (5) gallon capacity; and set apart by one and a half (1.5) times the height of the plant or twelve inches (12"), whichever is greater, from the structure and each other. These plants shall be no greater than 18 inches in height. Dead or dying material on the plants shall be removed.~~

(2) Trees ~~and large shrubs~~ within Zone 0 shall be maintained so that there are no dead or dying branches. All ~~small~~ live tree branches (~~<2"~~) ~~and foliage~~ shall be maintained five feet (5') above the adjacent Building or Structure's roof, ten feet (10') away from chimneys and stovepipe outlets, and five feet (5') from the sides of any Building or Structure.

(B) Exception: this subdivision does not apply to single specimens of trees ~~or other vegetation~~ that are well-pruned and maintained so as to effectively manage fuels and fuel ladders, as provided in Public Resources Code Section 4291.

Thank you for the opportunity to comment on this important rule.

Sincerely,



Tracy Lovric, District Manager, on behalf of:

Daniel S. Cooper, PhD, Principal Conservation Biologist

Rosi Dagit, Principal Conservation Biologist/Certified Arborist

Shelly Backlar, Community Resilience Director