



September 17, 2025

State Board of Forestry and Fire Protection
715 P Street, 10th Floor
Sacramento, California

**RE: LOS ANGELES CITY COUNCILMEMBERS DEFENSIBLE SPACE ZONE ZERO
REQUIREMENTS RECOMMENDATIONS**

Board of Forestry and Fire Protection Members,

On January 1, 2021, Assembly Bill 3074 (AB 3074), known as the “Ember-Resistant Zones Act” went into effect. Citing a dramatic rise in the destructiveness of California wildfire events, AB 3074 established a new defensible zone that eliminates materials “likely to be ignited by embers” in a new space within 0'-5' around structures in State Fire Responsibility Areas and Very High Fire Hazard Severity Zones (VHFHSZ) within Local Fire Responsibility Areas. We are aware that your Board is now in the final stages of creating guidelines for these positions, and intend to finalize them by the end of this year.

The catastrophic fires in Altadena and the Pacific Palisades earlier this year proved that in the face of a worsening climate crisis, not only are structures located on hillsides in the Wildland Urban Interface (WUI) threatened by fire and windstorm events, but so are our dense urban neighborhoods.

The Los Angeles City Council has received a report from the City of Los Angeles Community Forestry Advisory Committee (CFAC) and the Los Angeles Fire Department (LAFD), regarding the effects your proposed recommendations for landscape management would have on our districts and all VHFHSZs in the City of LA¹. We are currently considering the implications of that report in our Public Safety Committee with full recommendations to be considered by the City Council shortly.

¹ City of Los Angeles Council CFAC and LAFD Report Back [10-2468-S2](#)

Given the analysis in that report, we have serious concerns that some of the current recommendations may do more harm than good when applied in urban Los Angeles. Our key concerns are laid out in this letter.

Destruction of Tree Canopy

One of the most alarming aspects of the proposed Zone 0 Defensible Space regulations is the impacts that it would have on the existing tree canopy in many Los Angeles neighborhoods, including Silver Lake, Echo Park, and Hollywood in CD 13; Highland Park and Chinatown in CD 1; the Hollywood Hills, Laurel Canyon, Runyon Canyon, and Griffith Park neighborhoods of CD 4; Eagle Rock, Highland Park, Hermon, Monterey Hills, Rose Hill, El Sereno and Lincoln Heights in CD 14; as well as most of the South San Fernando Valley hillsides and almost all of the Santa Monica Mountains Zone. Though the intention of AB 3074 was to create an ember resistant zone around structures, what has been proposed is the creation of fully non-combustible zones, lacking almost any vegetation. In many of these communities, single family homes and apartments have been constructed on small lots, many times with less than five feet to the property line. This proposal could eliminate hundreds of acres of healthy vegetation and trees in older, denser neighborhoods, many of which lack adequate greening as is, and clear the way for invasive, less fire-resistant species to grow in their place.

The report from CFAC and LAFD indicates that in Silver Lake, up to 18% of the tree canopy could be impacted or removed.² In Highland Park, up to 12% of the tree canopy stands to be impacted or removed.³ Under these proposed guidelines, implementation could also require the removal of healthy street trees from the public right-of-way, which provide shade, aid climate adaptation, and increase fire resilience. In our City—which is already struggling to maintain, let alone expand, access to shade and greenspace, particularly in low-resource areas—the impact of regulations could destroy progress towards our tree equity goals⁴.

Removal of Fire-Resistant Healthy Vegetation Not Supported By Science

Contrary to this policy’s aim to create new ember-resistant zones by eliminating vegetation near structures, UC Berkeley researchers observed in the aftermath of the recent Southern California firestorm events that the presence of defensible space is not a primary fire risk to structures in Wildland Urban Interface areas. Rather, the case studies demonstrated that the primary risk was the spacing of structures and the flammability of their materials⁵. In many cases from the January 2025 fires in Altadena and the Pacific Palisades, it was observed that green, well-maintained vegetation was able to slow the spread of fires, block flying embers, and save

² City of Los Angeles Council CFAC and LAFD Report Back [10-2468-S2](#) (Page 10)

³ City of Los Angeles Council CFAC and LAFD Report Back [10-2468-S2](#) (Page 10)

⁴ [Los Angeles Urban Forest Equity Collective](#)

⁵ [“Isolating the Primary Drivers of Fire Risk to Structures in WUI regions in California,”](#) Michael Gollner, et al. 2025.

structures⁶. Although it is not in the purview of your Board to examine the flammability of structures in your guidelines, research and advocacy from our region suggests an evidence-based approach to protect urban neighborhoods in areas with risk of wildfire may include the maintenance of protective and well maintained green spaces.

Artificial Turf in Defensible Space

In a previous version of these regulations, artificial turf was explicitly banned in Zone 0, but it has since been removed. Artificial turf is known to have a high heat-generating index and can release toxic fumes during fires. If there is one broad type of landscaping or treatments that should not be permitted in defensible space, it's synthetic materials that would further contaminate soil and stormwater runoff in wildfire affected areas.

Applicability and Impacts on Residents, Businesses, and City Staff

In addition to our concerns regarding the loss of healthy protective vegetation, valid concerns are raised about the cost and timeline for both residents and businesses in compliance and local jurisdictions for enforcement. With thousands of additional properties added to the VHFHSZ just this calendar year, and with these proposed stricter standards, the City will need additional resources to ensure compliance and residents and businesses will need financial support to comply. If the standards are adopted as is, we will need support for our personnel's expanded workload and support to assist low-resource residents with their compliance.

Outreach Process

The first Zone 0 Committee meeting was hosted in March 2025. Six months in, and after advocacy from Southern California, the State is now turning its attention to specifically engaging the Los Angeles region. If greater intentionality had been paid to our region in this process, it could have served as a launching point for greater awareness and ultimately compliance with the final rule. While we thank the Committee for now coming to Southern California, we urge additional engagement that acknowledges the urban context, unique ecosystems, and diversity of the City of Los Angeles.

Conclusion

With a deadline to finalize your Zone 0 Defensible Space guidelines by the end of the year, your Board has a limited amount of time to make your decision as it relates to fire safety, climate resilience, and the future of urban life and development in California. Based on the advocacy of CFAC and other environmental groups within our districts, we share concerns of a

⁶ ["California's proposed ban on plants near homes could be dangerously bad advice"](#) Moritz and Carmignani, 2025

one-size-fits-all approach to maintaining defensible space across the entire State. We urge you to consider the recommendations for Los Angeles in the September 8, 2025 report to the Los Angeles City Council from CFAC and LAFD and any recommendation as adopted by the full City Council following our current deliberations. Our request is that the decisions are evidence based, equity-focused, and balance the critical issues of both safety and liveability in the newly added urban areas of the VHFHSZ.

Sincerely,

Eunisses Hernandez
Los Angeles City Councilmember, 1st District

Nithya Raman
Los Angeles City Councilmember, 4th District

Katy Yaroslavsky
Los Angeles City Councilmember, 5th District

Hugo Soto-Martinez
Los Angeles City Councilmember, 13th District

Ysabel Jurado
Los Angeles City Councilmember, 14th District

CC: Joanne D'Antonio, Chair, Community Forest Advisory Committee
Cyndi Hubach, CD 13 Alternate Representative, Community Forest Advisory Committee
Scott Fajack, CD 13 Representative, Community Forest Advisory Committee
Deeanne Paul, CD 4 Representative, Community Forest Advisory Committee
Adele Slaughter, CD 4 Alternate Representative, Community Forest Advisory Committee
Charles Miller, CD 5 Representative, Community Forest Advisory Committee
Mindy Mann, CD 5 Alternate Representative, Community Forest Advisory Committee
Jack Smith, CD 14 Representative, Community Forest Advisory Committee
Angelic Perez, CD 1 Representative, Community Forest Advisory Committee
Lynnette Kampe, CD 1 Alternate Representative, Community Forest Advisory Committee