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September 15, 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: Opposition to Current Draft of Zone 0 Regulations

Dear Committee Members:

The Brentwood Homeowners Association (BHA), established in 1946, represents approximately 4,500 single family homes and condominiums north of San Vicente Boulevard to the Santa Monica Mountains, west of the 405 Freeway, and east of Canyon View Drive in the Los Angeles zip code of 90049. The majority of our members reside in a Very High Fire Hazard Severity Zone (VHFHSZ) adjacent to the Santa Monica Mountains.

We take wildfire safety extremely seriously. In 2024, we established the first California Fire Safe Council in Brentwood to educate residents on fire prevention and mitigation. We have also submitted comments and attended every Zone 0 committee meeting since April. Despite this engagement, the proposed regulations continue to disregard the concerns raised by our community and by independent fire scientists.

Our community has always complied with reasonable, science-based brush clearance rules. We will continue to do so. But we will not accept regulations that:

- Destroy our environment and urban canopy,
- Impose unaffordable costs on homeowners and taxpayers,
- Increase utility bills and grid instability, and
- Ignore the scientific consensus on fire behavior and home ignition.

We must be clear: Zone 0, as written, is not feasible, not defensible under science, and not enforceable in practice. If adopted, it will generate non-compliance, environmental destruction, financial hardship, grid instability, and political backlash.

WHY ZONE 0 CANNOT BE IMPLEMENTED

1. Environmental Destruction

The blanket requirement to strip all vegetation within five feet of homes is ecologically reckless and environmentally unsound. Across Los Angeles, this would mean:

- **Tree canopy loss:** Mature shade trees and privacy hedges that have taken decades to grow would be destroyed. According to Los Angeles County's Tree Canopy Assessment, urban tree cover is already

declining, contributing to hotter streets, poorer air quality, and increased stormwater runoff. Removing thousands more trees will worsen these problems.

- **Heat impacts:** Studies show that tree canopy can lower surrounding temperatures by up to 10°F. Without shade, homes heat up dramatically, forcing residents to use more air conditioning and increasing statewide peak energy demand.
- **Erosion and hillside destabilization:** In steep hillside neighborhoods like Brentwood, removing root systems increases the risk of mudslides and slope failures during winter storms.
- **Loss of biodiversity and habitat:** Hedges and landscaping provide critical nesting, pollinator, and wildlife habitat. These regulations would decimate urban ecosystems for no proven safety benefit.

2. Financial Burden

Zone 0 imposes massive, unfunded mandates:

- **Homeowner costs:** Clearing vegetation, removing hedges, cutting mature trees, and rebuilding fences or trellises could cost individual homeowners tens of thousands of dollars.
- **Community-wide costs:** For Los Angeles alone, compliance would run into hundreds of millions of dollars. These are resources homeowners could better invest in proven safety measures such as ember-resistant vents, Class A roofs, and double-pane windows—all shown by CAL FIRE and the Insurance Institute for Business & Home Safety (IBHS) to meaningfully reduce risk.
- **Taxpayer costs:** Enforcement would require new inspection staff, legal processes for fines and liens, and public resources diverted from more effective wildfire programs.

3. Grid Stress and Higher Utility Bills

By eliminating shade and vegetation, Zone 0 regulations will increase building temperatures and drive higher demand for cooling:

- **Peak load increase:** Southern California Edison and LADWP have already warned about grid strain during heat waves. Zone 0 will make this worse.
- **Higher household bills:** Families will face not only the cost of compliance but also higher monthly energy costs. This policy effectively taxes Californians twice—once for removal and again through their utility bills.
- **Statewide impact:** Because the regulations apply across diverse climates, even areas where vegetation poses little to no ignition risk will be forced to strip shade and pay higher cooling costs.

4. Unscientific Mandates

Zone 0 is not grounded in independent, peer-reviewed science.

- **Home hardening is the proven solution:** Research by Dr. Jon Keeley (USGS/UCLA), Dr. Alexandra Syphard (Conservation Biology Institute), and the Insurance Institute for Business & Home Safety clearly show that home ignition risk is driven by embers entering vents, vulnerable roofs, and flammable construction—not irrigated, maintained vegetation near structures.
- **Urban fire behavior differs from wildland fire:** Many of California's most destructive fires, including the 2018 Camp Fire and the 2021 Dixie Fire, spread through embers and house-to-house ignition, not by shrubs within 5 feet of homes.

- **Overgeneralization ignores local conditions:** A “one size fits all” clearance mandate fails to recognize California’s diverse ecosystems. In dense urban areas like Los Angeles, irrigated plants often reduce fire risk by acting as ember catchers and cooling surrounding air.

ENFORCEMENT WILL FAIL

The Board of Forestry must also consider practicality:

- **Widespread non-compliance:** Very few properties meet these rules today. Most cannot and will not comply.
- **Backlash and litigation:** Attempting to enforce fines, liens, or forced clearance against tens of thousands of homeowners will generate lawsuits, political opposition, and community outrage.
- **Distraction from effective policy:** Chasing vegetation infractions will consume resources better spent on enforcing existing brush clearance, expanding defensible space education, and incentivizing home hardening.

THE BOTTOM LINE

Zone 0, as written, is destined to collapse under its own unworkability. We urge the Board of Forestry to withdraw or completely rewrite these regulations, grounding them in peer-reviewed science, local flexibility, and proven strategies such as home hardening. Anything less will undermine both community trust and public safety.

Sincerely,

Thelma Waxman

Thelma Waxman
President

cc: Councilwoman Traci Park, Council District 11
Supervisor Lindsey Horvath, Third District
Mayor Karen Bass
Assemblymember Jacqui Irwin, District 42
Senator Ben Allen, District 24
Governor Gavin Newsom