



May 22, 2025

To:

Zone Zero Regulatory Advisory Committee
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Subject: **Recommendations on Proposed Zone 0 Updates to Public Resources Code 4291**

Dear Members of the Zone Zero Regulatory Advisory Committee,

On behalf of MySafe:LA, **I would like to express my gratitude to the Committee** for your exemplary leadership in facilitating the thoughtful advancement of wildfire mitigation regulations, including the proposed amendments to Public Resources Code 4291. Your dedication to gathering comprehensive stakeholder input is profoundly appreciated.

As the Wildfire County Coordinator for Los Angeles County, **MySafe:LA diligently supports and develops NFPA Firewise USA® sites and Fire Safe Councils within our region.** Since 2008, we have served as a formal public safety partner of the Los Angeles Fire Department (LAFD), and we currently spearhead the Los Angeles Wildfire Alliance, a strategic partnership among public agencies, community leaders, and non-profit organizations dedicated to wildfire preparedness, education, and policy innovation.

In addition to our formal roles in Los Angeles, **MySafe:LA leads a regional ad hoc wildfire working group** that spans multiple counties, including **Kern, Orange, Ventura, Los Angeles, and Riverside**. This coalition facilitates the sharing of best practices, coordinated messaging, and the identification of scalable solutions across diverse topographies and jurisdictions. Together, these five counties **represent over 1.25 million homes** situated within the Wildland-Urban Interface (WUI), with approximately **575,000 in Los Angeles County, 210,000 in Riverside, 180,000 in Orange, 160,000 in Kern, and 140,000 in Ventura**. The scale of exposure highlights the critical need for policy that is actionable, fair, and regionally informed.

In this role, we have conducted extensive outreach with homeowner associations, individual residents, civic leaders, and fire service agencies regarding the Zone 0 proposal. These

conversations have revealed a range of support, concerns, and insights that we believe are important for the Committee to consider in shaping reasonable and effective legislation.

Key Recommendations:

Regional Variability and Context-Specific Implementation: We urge the Committee to explicitly recognize the geographic and structural differences between Northern and Southern California. In Southern California, particularly in Los Angeles County, many homes are situated in densely populated neighborhoods with limited setbacks, multistory construction, and closely spaced neighboring structures. These conditions sharply contrast with many Northern California communities, where larger parcels and greater opportunities for defensible space exist.

The 2025 update of the Very High Fire Hazard Severity Zone (VHFSZ) maps encompasses areas such as the Sunset Strip, Hollywood Boulevard, parts of the UCLA campus, and Chinatown—urban locales where **enforcing a fully vegetation-free 5-foot Zone 0 is impractical**, given their easy access for firefighters and the absence of wildland fuels. Unless the VHFSZ maps are reviewed, the Zone 0 rule requires regulatory adaptability to reflect these circumstances. Otherwise, many residents may feel overwhelmed or discouraged from pursuing wildfire mitigation efforts.

Tiered Implementation Based on Construction Year: To create a fair and attainable path to compliance, we recommend a three-tiered approach based on the year a home was constructed.

Tier 1 – Pre-2007 Homes: Homes built before the adoption of Chapter 7A of the California Building Code should receive recommendations instead of mandates. These recommendations should encourage home hardening where feasible and allow low-risk, well-maintained vegetation within the 5-foot Zone 0 area. *The emphasis should be on education and voluntary enhancements.*

Tier 2 – Homes Built 2008–2024: These homes were constructed under Chapter 7A and are generally better positioned for improved Zone 0 compliance. Guidance here should promote further alignment with ember-resistance goals, *using advisory language such as “should” to reinforce urgency without creating retroactive obligations.*

Tier 3 – New Construction (2026 and Beyond): For new homes, we advocate for a clear and strict standard: a non-combustible Zone 0, devoid of flammable materials, and integrated with a transition zone into Zone 1. *This tier should employ mandatory language and reflect best practices in wildfire mitigation for new construction.* While the inclusion of potted plants is suitable, there should be additional guidance on native versus invasive vegetation.

Alignment with the California Department of Insurance: As Zone 0 guidance becomes more specific, **we urge the Committee to collaborate with the California Department of Insurance** to ensure that insurance carriers clearly understand regulatory expectations. Without such collaboration, insurers may impose additional, often burdensome requirements that exceed what the law mandates, leading to confusion and unfair penalties for homeowners.

Moreover, we are increasingly concerned that this law—if implemented with inflexible mandates—could provide insurance companies with a perceived "green light" to cancel or deny coverage to any homeowner who is unable to achieve 100% compliance, *regardless of contextual factors such as construction type, slope, adjacent structures, or material upgrades*. This risk of blanket enforcement could further destabilize already vulnerable communities and discourage the incremental mitigation efforts that should be celebrated and supported.

Evidence-Based Approach to Vegetation Management: We strongly caution against a universal mandate to eliminate all vegetation within the 5-foot Zone 0, including in new construction. A growing body of scientific literature highlights the nuance required in vegetation management:

The 2014 article published in the International Journal of Wildland Fire by Syphard, Brennan, and Keeley emphasized that the survival of homes is more **significantly influenced by structural factors and proximity to other buildings rather than solely by the presence of nearby vegetation**.

Numerous researchers have posited that specific varieties of **vegetation may serve a protective function**, contingent upon their arrangement, maintenance, and the characteristics of the species involved. This data is significant, and we strongly encourage you to take this into consideration.

It is also important to emphasize that the original 2020 legislation (AB 3074) called for an "ember-resistant" zone—not an "ember-free" one. **The distinction is critical.** While there is no guarantee that any hardened home will survive a wildfire, the spirit of this legislation is not to create absolute prevention of ignition, but rather to **reduce the scale of wildfire destruction by improving structure survivability**. *A flexible, science-informed approach is more likely to meet this intent than a rigid ban on all vegetation within Zone 0.*

A Shared Concept: Presenting "Home Fire Defense." Although terms like home hardening and defensible space are essential and should continue to be used, we suggest adopting a cohesive public term, such as "Home Fire Defense." This idea could act as a communication link, motivating homeowners to adopt a comprehensive strategy for wildfire mitigation that encompasses both structural and behavioral aspects. Additionally, it broadens the fire resilience message to consider not only wildfires but also the risk of urban fires that can arise from wildfire-related destruction.

Implementation Pathways and Community Support: Alongside regulatory changes, we recommend that the Committee advocate for and assist in establishing effective implementation pathways. This includes:

- Increasing access to state and federal grants that facilitate home hardening retrofits is essential for preventing fires from threatening and damaging properties.
- Establishing incentives for high-risk communities to establish local Fire Safe Councils and apply for Firewise USA® site designation is crucial. While the Firewise application process is undergoing improvements, it remains equally imperative to ensure that entities possessing

a Firewise designation persist in receiving educational resources and policy updates. This is essential to prevent them from overreacting, under-responding, or neglecting the essential tasks involved in fostering wildfire resilience. This necessity is particularly pronounced in California, the foremost state for NFPA Firewise entities.

- Encouraging pilot projects and demonstration sites in diverse settings to show how Zone 0 recommendations can be achieved without compromising community character or livability.

For example, MySafe:LA has documented measurable risk reduction and strong community engagement in areas such as the Hollywood Hills and Sylmar. Local councils and targeted education campaigns are leading to increased compliance with defensible space standards and home hardening upgrades—even in topographically and demographically complex neighborhoods.

MySafe:LA believes that effective wildfire mitigation policy must be evidence-based, regionally adaptable, and publicly accessible. *We support the Committee's efforts and remain ready to assist with public education, implementation strategies, and community engagement.*

Thank you again for your leadership on this essential issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Barrett', with a stylized flourish extending from the end.

David Barrett
Executive Director

Additional signatures are attached.

DB/cs