BRENTWOOD HOMEOWNERS ASSOCIATION

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April 28, 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: Comments on Proposed Zone 0 Regulations

Dear Committee Members:

The Brentwood Homeowners Association (BHA) represents approximately 4,500 single family homes and condominiums north of San Vicente Blvd to the Santa Monica Mountains, west of the 405, and east of Canyon View Drive in the Los Angeles zip code of 90049. A majority of our members reside in a Very High Fire Hazard Severity Zone near the Santa Monica Mountains. Given our location in a wildland-urban interface and experience[1] with fires, BHA established the first California Fire Safe Council in Brentwood last year to educate our community on fire prevention and mitigation. BHA is committed to fire safety.

**Based on our experience and research into fire ecology, we object to the residential vegetation clearance mandates being developed under AB3074 regarding defensible space for Zones 0, 1 and a transition zone.** After attending the April 7 workshop and reviewing the Advisory Committee's Draft Rules, BHA opposes these proposed regulations governing defensible space for the following reasons:

- The very broad, one size fits all approach is not appropriate for the Southern California urban environment in which we live. According to the California Wildfire and Forest Resilience Task Force, S**outhern California is unique and requires carefully tailored management approaches for wildfire resilience.**
- Fire ecology shows that proper vegetation can help prevent fire risk, especially in wind-driven wildfires. According to Dr. Jon Keeley, once the embers reach the urban environment, the vegetation growing around the homes doesn't play a critical role. **Certain trees may help protect homes by catching embers, contrary to some conventional wisdom.[2]**
- The complete removal of vegetation around homes in a densely populated urban environment such as Los Angeles will increase rather than reduce the risk to our homes. **In a wind driven fire like the recent Palisades Fire where homes burned due to flying embers, totally clearing the area will carry embers right into the house.**

[1] In October 2019, the Getty wildfire burned 745 acres in Brentwood. 10 homes in BHA territory were destroyed and 15 damaged. In December 2017 our members were evacuated due to the Skirball Fire and again this year during the Palisades Fire.

[2] Presentation by Dr. Jon Keeley, a senior scientist with the U.S. Geological Survey, professor at the UCLA Institute of the Environment and Sustainability, and author on 400+ peer reviewed journal articles on fire ecology, at a February 18, 2025 virtual meeting of the Brentwood Homeowners Association.

- Implementation of the proposed regulations would cause irreparable harm to the environment as a whole and is not grounded in science.

**Fire Experts Agree—Southern California is Nothing Like the Rest of the State**
According to Dr. Jon Keeley, Southern California is nothing like Northern California when it comes to fire risk management. In fact, he went so far as to say that what is appropriate for the northern part of the state does not apply to the southern part. Applying defensible space standards that are effective in places like Paradise that experienced a wildfire fueled by vegetation does not make sense in our urban setting where houses are built close to one another on smaller lots. In addition, fires fueled by our unique Santa Ana winds have been known to cast embers miles into the environment. Homes not protected by vent coverings, dual paned glass windows and fire-resistant roofs are most at risk.

**Science Does Not Support the Proposed Guidelines**
The mandates that will be imposed on our homes in West Los Angeles do not take into account the fact that fires like we experienced locally in the Palisades were from flying embers. In discussing the recent Palisades Fire, Dr. Keeley concluded that it was an urban conflagration where the homes were the fuel, not the surrounding vegetation.

According to Dr. Keeley's research, once embers reach the urban environment, the vegetation growing around the homes does not play a critical role. In the case of the Eaton fire, homes were destroyed, not by fuels that carried the fire from one house to another, or wild land fuels, **but by the homes themselves.** "Once a home is ignited, it produces extremely intense fires, and those spread from house to house. Once the fire gets started in these areas, it's an urban fire. It's not a wildland fire, and it's spread by the fuels of the homes themselves in large part, because homes represent very dry fuels. Homes are made from dried material, and they are in equilibrium with the ambient conditions. When you have a Santa Ana Wind environment, 5% relative humidity, homes are extremely dry, and they ignite readily."[3]

**Proposed Guidelines Could Actually Increase the Risk to Our Homes in an Urban Environment**
In an area with small lots, if each neighbor is forced to clear Zone 0 and most of Zone 1 we will be left with very little greenery—anywhere. Consider the fact that the Los Angeles Municipal Code requires a five-foot setback for side yards. This would mean that there would be no vegetation at all between homes. And if it is all hardscape around homes, you run the risk of laminar flow, which Dr. Keeley described to us in February, "**There's actually a downside to totally clearing an area. And that is that when the winds are blowing embers blow in a laminar flow, and if there's nothing obstructing that laminar flow, embers can be carried right into the house. There is a downside to total clearance, and it has to be recognized that trees themselves can play a really critically important role."**

According to a University of California Agriculture and Natural Resources (UCANR) guidance document, fire-safe landscaping does not mean removing all vegetation but rather ensuring that plants are well-maintained, hydrated, and properly pruned. Similarly, the U.S. Geological Survey has found that lightly irrigated native shrubs can actually reduce fire hazard around homes. (We have examples from the Palisades fire where hedges and trees captured embers protecting the homes.) When properly maintained, trees play a crucial role in fire mitigation:

[3] Presentation by Dr. Jon Keeley at February 18, 2025, virtual meeting of the Brentwood Homeowners Association.

1. Moisture retention – Large trees increase humidity and reduce overall dryness, making landscapes less flammable.
2. Soil stability – Trees have deep roots that prevent erosion and mudslides, which are major post-fire hazards.
3. Wind and ember control – Tree canopies can catch and slow flying embers, preventing them from reaching homes.

**No Consideration of the Impact on the Environment of Removing 40% of the Urban Forest in our Area**
The loss of this expanse of urban forest would have significant adverse impacts on biological resources, greenhouse gas emissions, air quality, and hydrology/water quality. In addition, the proposed rules will deprive us of vegetation that is critically important, not only for our quality of life and well-being but for our safety. It is our understanding that there has not been any environmental review done under CEQA on this legislation. Please pause, do an environmental impact report and then listen to the science and the most impacted residents in fire zones to formulate more appropriate rules that make us truly safer.

**Conclusion**
Analysis of the Palisades and Eaton Fires has shown that the primary fuel was structures. Homes burned because embers ignited buildings, fences, and other flammable materials—not because of trees. A review of the Eaton Fire shows that the first night and into the morning of the Eaton fire, the fire had spread several miles in many directions from the ignition point, primarily from wind-driven embers and in some areas closely spaced, flammable homes, igniting each other through radiant heat and flame contact. It is evident that urban trees and plants did not cause the spread of this fire. The homes themselves, along with cars, were the most combustible part of the landscape.[4]

The most devastating Southern California fires have been Santa Ana fueled wind driven fires. Experts have concluded: **Removing all vegetation does not prevent embers from landing on the home. Data from past fires show while vegetation may be scorched during fires, the fire did not burn through to get to the home, rather embers blown onto the top of the home ignited the home, even though the adjacent landscape was relatively untouched.[5]**

If we really want to protect our homes and property, it starts with hardening our homes not with creating barren landscapes.

Sincerely,

Thelma Waxman

Thelma Waxman
President

[4] "With a Landscape Approach, We Can Reduce the Risk of Wildfire." By Ronnie Siegel, ASLA. THE DIRT. Uniting the Built and Natural Environments.
[5] Presentation by Dr. Jon Keeley at February 18, 2025, virtual meeting of the Brentwood Homeowners Association.