

June 14, 2025

VIA EMAIL (PublicComments@bof.ca.gov)

Zone Zero Regulatory Advisory Committee
California Board of Forestry and Fire Protection
Natural Resources Building
715 P Street
Sacramento, CA 95814

Re: Defensible Space Zone 0 and Vegetation/Trees

Dear Committee members:

This letter offers comments of the California Audubon Society dba San Fernando Valley Audubon Society (SFVAS) on the June 16, 2025 draft of the Zone 0 regulations proposed under Public Resources Code §4291. SFVAS appreciates the efforts of State Senator Friedman (AB 3074), Governor Newsom (Executive Order N-18-25), and the California Board of Forestry and Fire Protection (BOF) to develop thoughtful wildfire mitigation regulations.

SFVAS is a chapter of the National Audubon Society (NAS), and has been advocating for supporting biodiversity, nature education and bird conservation since 1906. Our territory encompasses the entire San Fernando Valley north of Mulholland Drive, and environs north to the Kern County line. The NAS represents millions of people nationwide. SFVAS has been very active in supporting restoration and preservation of native vegetation in our area, recognizing the tremendous benefit it provides our resident and migratory bird species alike.

Los Angeles County, including its dense urban areas, is a biodiversity hotspot, meaning it has a high concentration of unique and diverse plant and animal life, hosting over 4,000 species. The city's biodiversity provides innumerable benefits. However, Los Angeles also faces biodiversity threats from habitat loss and a particular threat in our dense urban area is loss of tree cover and understory. In the interest of expanding our local tree canopy, and providing habitat and water conservation, local agencies such as the Los Angeles Department of Water and Power (LADWP) are giving away trees and providing rebates for installing drought-resistant shrubs in place of turf. Many of our Southern California Audubon Chapters, including SFVAS, have promoted and facilitated installation of bird and bug-friendly native habitat surrounding structures.

Los Angeles is directly within the [Pacific Flyway](#) and is variously a crucial stopping point, breeding ground or wintering site for hundreds of avian species. North America has already experienced massive reductions in bird population due to habitat loss and climate change. Preservation of our urban forest is a crucial component of supporting avian life, and that is the reason SFVAS is commenting on the following rule-making process by the BOF.

The BOF is in the process of revising ember-resistant zone and structure hardening regulations to improve safety for firefighters and increase survivability of a building or structure. The rules will apply to areas the State is responsible for but they must be adopted by areas of local responsibility (for example, the Los Angeles City and County Fire Departments). Information regarding this process, including presentations, the Governor's executive order requesting rules be finalised in 2025, related legislation, and the draft regulations may be found at this BOF [site](#).

The intent is that the rules will apply to areas within the High and Very High Fire Hazard Severity Zones based on new proposed [Hazard Severity maps](#) released in 2025 by CalFire (Office of the State Fire Marshal). It is important to note that these maps reflect areas that might be subject to ember cast under suitable conditions, not actual risk. In many cases these maps have expanded Hazard Severity zones into dense urban and suburban communities.

It appears that the BOF, in developing the revised rules, is primarily considering parcels which abut the Wild-urban Interface (WUI), which often are relatively large and in coniferous-forested areas. Significantly for Southern California, new Hazard Severity maps extend the severity zones well into densely-developed urban areas with relatively small lots - for example 50' by 100', with many buildings within 20' or less of each other in addition to being less than 30' from adjoining streets. **The consequences of applying the new Zone 0-1-2 rules to such urban areas would lead to catastrophic loss of and irreversible harm to our already dwindling urban tree canopy and ecosystem.** This would include street trees, protected trees, and indeed most vegetation from closely-spaced structures. Needless to say, if habitat is eliminated, wildlife including birds will have no home and increased loss of birds will occur.

There is ample scientific evidence indicating that healthy living vegetation adjacent to structures either had no role in igniting structures, or was actually protective. Much evidence is cited in the April 26, 2025 letter to the BOF (Longcore, Rich, Scow and Ossola) . A recently-released study (Escobedo et al. 2025) found that healthy vegetation adjacent (Zone 0) to structures in the Thomas Fire was associated with increased structure survivability.

Regarding the rule-making process, SFVAS concurs with the analysis from the **MySafe LA** group , as follows:

“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.** “*

SFVAS certainly will support rational rules to protect our communities and its embedded habitat. SFVAS will gladly recommend plantings that tolerate summer water near structures, and discourage species known for flammability, but it opposes removal of healthy well-maintained tree canopy and understory. It will support proper hydration of plantings, and clearance of leaf litter and dead vegetation, but vigorously opposes elimination of urban habitat consisting of healthy vegetation. SFVAS objects to the proposed rule that plants in Zone 0 must be in pots - that makes no sense. SFVAS urges the BOF to adopt a science-based and region-density adjusted approach to this rule-making process.

Respectfully,

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Conservation Committee Co-Chair
San Fernando Valley Audubon Society
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Reference:

Escobedo, F.J., K. Yadav, O. Cappelluti, N. Johnson, 2025. Exploring urban vegetation type and defensible space's role in building loss during wildfire-driven events in California. *Landscape and Urban Planning* **262**: