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June 9, 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: Opposition to Zone 0 Fire Safe Regulations

Dear Advisory Committee,

The Hillside Federation, representing 46 resident and homeowner associations with approximately 250,000 constituents spanning the Santa Monica Mountains, has a long history of promoting policies and regulations that help to preserve and provide a safe environment for our hillside communities.

Consistent with the Hillside Federation's mission to encourage and promote those policies and programs which will best preserve the natural topography and wildlife of the mountains and hillsides for the benefit of all the people of Los Angeles, we stand opposed to the draconian fire-safe practices being considered by the State of California. What scientific studies were used to develop these policies?

We believe there should be a more balanced, science-based approach to fire safety policies rather than the Zone 0 concept being considered by State legislators. We have been briefed by Dr. Travis Longcore and think his suggestions should be considered when providing guidance on fire safety, specifically:

- **Exempt healthy vegetation** and focus on dangerous plant species and their characteristics
- **Exempt locally protected native tree species** (e.g., oaks, sycamores, walnuts)
- **Exempt municipal street trees**, because they are now at risk of removal
- **Reject the increased offset required for tree limbs** from the "ridgeline" — this is covered by the maintenance requirements
- **Give flexibility to local fire departments** — California is too diverse for a single rule to make sense from Chinatown to Chico

Argyle Civic Assn.
Beachwood Canyon NA
Bel-Air Assn.
Bel-Air Hills Assn.
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Dixie Canyon Assn.
Doheny-Sunset Plaza NA
Encino Property Owners
Franklin/Hollywood West Res.
Franklin Hills Residents Assn.
Friends of Walnut Canyon
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland HOA
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
LFIA (Los Feliz)
Mountaingate
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon NA
Oak Forest Canyon HOA
Oaks Neighborhood Assn.
Outpost Neighborhood Assn.
Pacific Palisades Res. Assn.
Residents of Beverly Glen
Save Coldwater Canyon!
Save LA River Open Space
Save Our Canyon
Shadow Hills POA
Sherman Oaks HOA
Studio City Residents Assn.
Sunset Hills HOA
Sunshine Hills Residents Assn.
Upper Mandeville Canyon Assn.
Upper Nichols Canyon NA
Whitley Heights Civic Assn.

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Most of our Hillside Federation members reside in the Very High Fire Hazard Severity Zone and nearly no properties comply. It will eliminate privacy and the valuable tree canopy which will increase temperatures and associated cooling costs. People will lose their trees and vegetation, including protected species and potentially be driven out of their homes due to the cost of compliance.

We therefore encourage the creation of a more balanced approach to ensure adequate fire safety in our communities while not destroying the very nature of those communities.

Sincerely,

A handwritten signature in cursive script that reads "Charley Mims". The signature is written in dark ink and is positioned above the printed name and title.

Charley Mims
President

Cc:

CA Senator Ben Allen
CA Assemblymember Jacqui Irwin
CA Assemblymember Rick Zbur