

CORRESPONDENCE FROM
2/3/2026 and 4/7/2026
LEGISLATIVE POLICY COMMITTEE
MEETINGS

Sabha, Tamer

From: Annette Yasin -
Sent: Monday, February 2, 2026 5:21 PM
To: Sabha, Tamer
Subject: comment on agenda item #4 - zone zero

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Legislative Policy Committee Members,

Please seek reliable scientific research data on wildfire prevention and not rely on Home Insurance Companies' data that is using vegetation as a scapegoat in the Zone Zero proposals. I hope you endorse Option 4 for plants and Option 2 for trees. It is so important that Pasadena take a stand for local control just as City of LA and Glendale. What are we waiting for? We are a city of trees and this type of legislation can not be "one size fits all" in a state with such diverse topography and climate zones.
Thank you for your time and consideration,

Annette Yasin
President Bungalow Heaven Neighborhood Association

Sabha, Tamer

From: cityclerk
Sent: Tuesday, February 3, 2026 8:48 AM
To: Iraheta, Alba; Jomsky, Mark; Robles, Sandra; Sabha, Tamer; McMillan, Acquanette (Netta); Soo, Christine
Subject: FW: Public Comment - Pasadena Legislative Policy Committee Meeting 02/03/26
Attachments: Public Comment - Pasadena City Legislative Policy Committee 02-03-26 Zone Zero.pdf

From: Yadi <
Sent: Tuesday, February 3, 2026 8:47:53 AM (UTC-08:00) Pacific Time (US & Canada)
To: PublicComment-AutoResponse <correspondence@cityofpasadena.net>; cityclerk <CITYCLERK@cityofpasadena.net>
Subject: Public Comment - Pasadena Legislative Policy Committee Meeting 02/03/26

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Hi,

Please find attached my public comment for the February 3, 2026 Pasadena Legislative Policy Committee Meeting, agenda item 4. Zone Zero.

Thanks,

Yadi

4. Zone Zero

I support calling for evidence-based, science-backed measures for wildfire prevention and mitigation efforts.

To be clear, Zone Zero regulates (by the Board of Forestry) the creation of an “ember-resistant zone” in structures that are within designated high fire hazard areas by the State Fire Marshal. However, in reality these measures are being pushed by the insurance industry, including pushing residents to clear a defensible space around the perimeter of their homes – even if their homes are outside of high fire hazard zones. This means there is more wide-spread efforts to remove all vegetation, including trees across the city of Pasadena and the state. Moreover, this is at the cost of policyholders, and there is still no assurance from insurance companies that their properties will be insured or that wildfire related claims will be covered and paid out. All while insurance premiums continue to rise for those in and outside of fire hazard zones.

Therefore, in addition to the Board of Forestry, I encourage the Council to advocate for insurance reform and sound wildfire mitigation initiatives with 1. The Department of Insurance; 2. The California Governor; and 3. The State Legislature.

Communities such as mine that were in the direct path of a wildfire fire and did not lose any homes should be studied to examine to learn what factors helped protect homes and the community. Instead, we are now being pressured by insurance companies to clear away a defensible space – even though we are not in a designated high fire hazard zone (and on our own dime). Regulation should not come from the private industry, rather an independent body with sound evidence and facts.

Yadi

Pasadena Legislative Policy Committee

February 3, 2026

4. Zone Zero

Sabha, Tamer

From: Lauren Siegel <
Sent: Tuesday, February 3, 2026 1:34 PM
To: Sabha, Tamer; Jomsky, Mark; McCloy, Lindsey Paige; Airitam, Derrick
Subject: Legislative Committee, Zone 0 Letter from EAC
Attachments: EAC - Final Zone 0 Memorandum to City Council.pdf

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Hi Mark,

I just wanted to make sure the EAC Zone 0 Letter was part of the packet and posted for the Legislative Committee today, as it is agendaized. I don't see it but maybe I am missing something. It is attached as well.

Thanks,
Lauren

--

Lauren Siegel
MS Sustainable Development and Resource Management
Pasadena Environmental Advisory Commissioner

MEMORANDUM

From: Pasadena Environmental Advisory Commission
Date: October 25, 2025
To: Members of the Pasadena City Council and Municipal Services Committee
Subject: Zone 0 Recommendation

Executive Summary

The Pasadena Environmental Advisory Commission (EAC) recommends the following distinctions to the proposed State regulations, based on research conducted by the City of Los Angeles Forestry Commission:

1. Allow flexibility for the Pasadena Fire Department and its inspectors to implement fire severity zones based on local conditions.
 2. Exempt all well-maintained vegetation and trees from mandatory removal, and establish an appeal process.
 3. Recommend regionally appropriate vegetation management practices that preserve and restore native species, prioritize fire-adapted natives where appropriate, and emphasize maintenance and irrigation.
 4. Explicitly exempt locally protected native trees and shrubs from all new regulations.
 5. Explicitly exempt well-maintained historic gardens and heritage trees.
 6. Prohibit the use of artificial turf within defensible space areas, as artificial turf generates extreme heat and emits toxic fumes when ignited, posing health risks to first responders.
-

Background

On June 23, the Pasadena City Council adopted Fire Hazard Severity Zone maps that empower the Pasadena Fire Department to mitigate wildfire risks while maintaining ecological health. The maps establish zones with increasing levels of protection and spacing requirements to prevent wind-driven fires from spreading between buildings, as seen during the Eaton Fire on January 7.

The California Board of Forestry now proposes adding a new “Zone 0,” which would prohibit nearly all trees, shrubs, lawns, ground vegetation, and artificial turf within five feet of any structure, with limited exceptions. This shifts the focus from an “ember-resistant zone” to a “non-combustible zone,” a change that has generated significant concern. The statewide

regulation would override local ordinances and fail to account for local vegetation, housing density, and wind conditions.

Public and Regional Response

The Board of Forestry has held statewide hearings on Zone 0, including a September 18 meeting at the Pasadena Civic Auditorium where hundreds of residents expressed concern following the Eaton Fire. Commissioners from the EAC have attended these sessions and consulted with fire prevention and sustainability experts, including Nurit Katz of UCLA, to evaluate the scientific basis of the proposal.

On October 7, the Los Angeles City Council, supported by the Los Angeles Fire Department and Los Angeles Urban Forest Advisory Committee (UFAC), voted unanimously to oppose Zone 0, citing the loss of local control and negative impacts on urban canopy, heat mitigation, and environmental health. On October 21, the Ventura County Board of Supervisors also unanimously opposed the proposal, urging restoration of local control and funding for regionally adaptable implementation.

Pasadena EAC Position

The EAC recommends that the Pasadena City Council take a similar position opposing the proposed Zone 0 regulation and maintaining local control under the Pasadena Fire Department to preserve well-managed trees and vegetation and uphold existing local ordinances.

Key Impacts of Zone 0

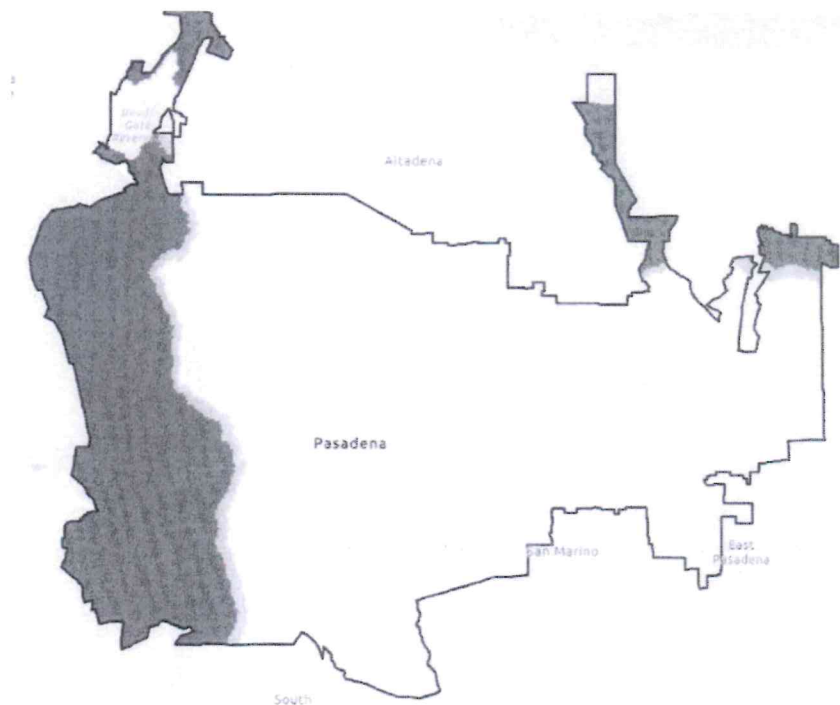
- **Loss of Natural Protections:** Trees reduce wind, capture embers, retain soil moisture, and stabilize hillsides which are critical protections against post-fire erosion, landslides and drought.
- **Loss of Tree Canopy and Increased Heat:** Removing all vegetation within five feet of structures would significantly reduce Pasadena's tree canopy, increase temperatures, energy use, and urban heat island effects.
- **Environmental Justice Impacts:** Low-income neighborhoods with smaller lots and closely spaced buildings would be disproportionately affected by increased heat and reduced shade.
- **Loss of Biodiversity and Habitat:** Vegetation removal would diminish biodiversity and wildlife habitat, weakening ecological resilience.

- **Scientific Evidence:** Research from the LA UFAC shows structure separation—not vegetation separation—is the key factor in preventing structure-to-structure wildfire spread.
- **Heritage and Identity:** Pasadena’s “Tree City” status and its historic landscapes, including the Tournament of Roses, La Casita Del Arroyo, and the Gamble House, would be at risk.
- **Financial Burden:** Removal of trees and vegetation across municipal, residential, and commercial properties would impose significant costs on property owners and the City.

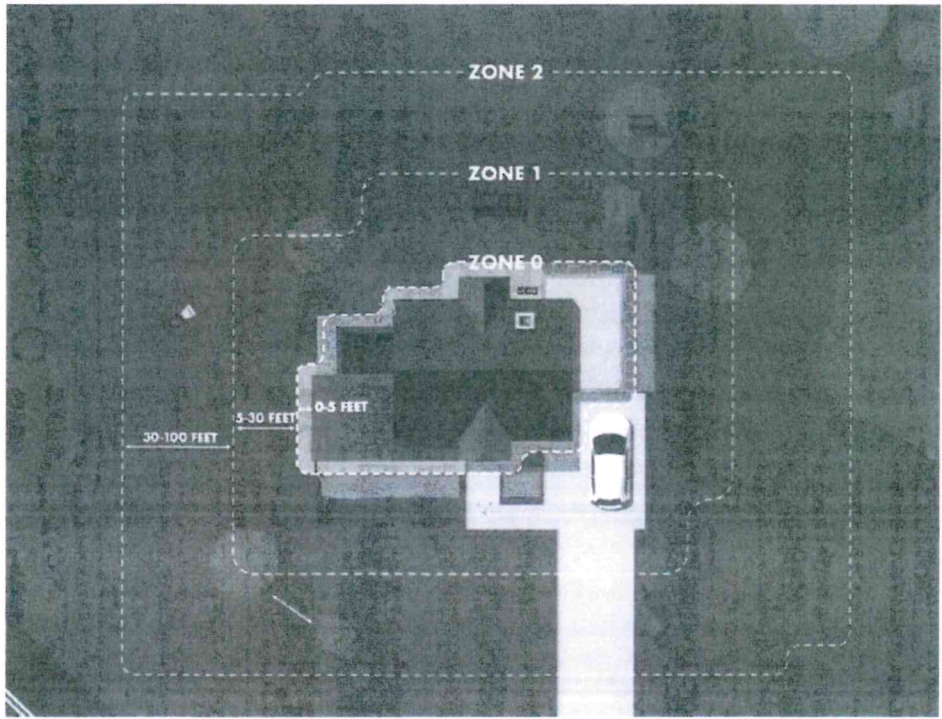
The Pasadena Environmental Advisory Commission urges the City Council to support a locally adaptive approach to wildfire resilience that safeguards public safety while preserving Pasadena’s ecological and cultural heritage. The proposed statewide “Zone 0” regulation imposes a one-size-fits-all standard that overlooks local conditions and proven fire management practices. By maintaining local authority, Pasadena can continue applying science-based strategies that reduce fire risk, protect its tree canopy, and uphold the city’s identity as a leader in sustainable urban stewardship.

Appendices:

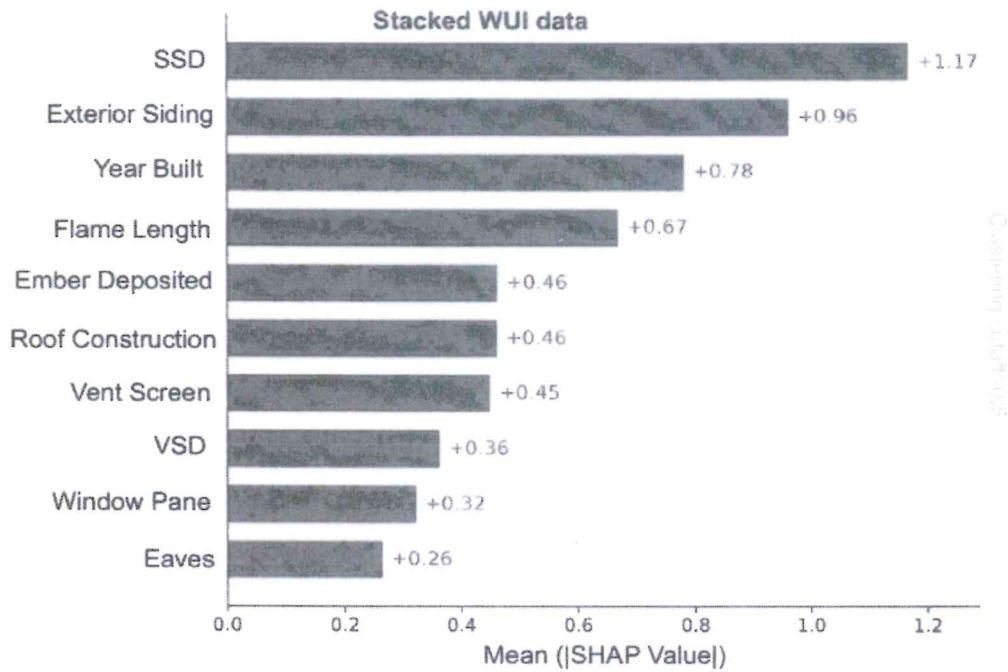
The new Fire Hazard Severity Maps are divided into zones with increasing levels of protection and distance from buildings:



The new Zone 0 is proposed to prohibit trees (with limited exceptions) and all ground vegetation, shrubs, lawns, and artificial turf within a five-foot buffer of every building:



SHAP aggregation results characterizing the contribution of features for the entire (stacked) WUI data from five fires. SSD is short for Structure Separation Defense. VSD is short for Vegetation Separation Defense



Sabha, Tamer

From: Jessica Richards < >
Sent: Tuesday, February 3, 2026 1:35 PM
To: Sabha, Tamer
Subject: EAC letter re Zone Zero for 2/3 legislative meeting
Attachments: EAC - Final Zone 0 Memorandum to City Council.pdf

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Please distribute this letter written by Pasadena's EAC as well. Thank you,

Jessica Richards

MEMORANDUM

From: Pasadena Environmental Advisory Commission
Date: October 25, 2025
To: Members of the Pasadena City Council and Municipal Services Committee
Subject: Zone 0 Recommendation

Executive Summary

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The California Board of Forestry now proposes adding a new “Zone 0,” which would prohibit nearly all trees, shrubs, lawns, ground vegetation, and artificial turf within five feet of any structure, with limited exceptions. This shifts the focus from an “ember-resistant zone” to a “non-combustible zone,” a change that has generated significant concern. The statewide

regulation would override local ordinances and fail to account for local vegetation, housing density, and wind conditions.

Public and Regional Response

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Key Impacts of Zone 0

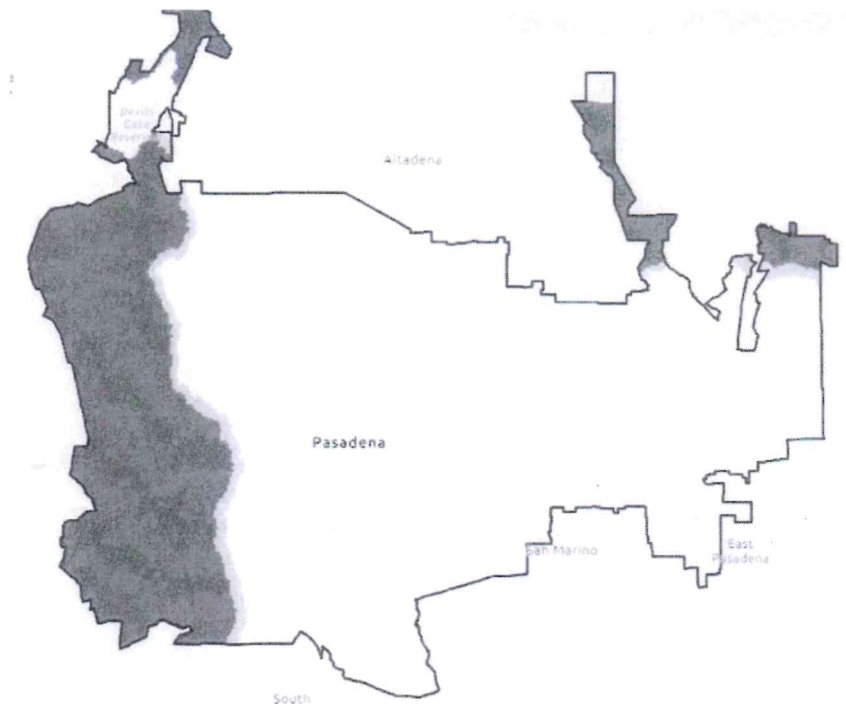
- **Loss of Natural Protections:** Trees reduce wind, capture embers, retain soil moisture, and stabilize hillsides which are critical protections against post-fire erosion, landslides and drought.
- **Loss of Tree Canopy and Increased Heat:** Removing all vegetation within five feet of structures would significantly reduce Pasadena's tree canopy, increase temperatures, energy use, and urban heat island effects.
- **Environmental Justice Impacts:** Low-income neighborhoods with smaller lots and closely spaced buildings would be disproportionately affected by increased heat and reduced shade.
- **Loss of Biodiversity and Habitat:** Vegetation removal would diminish biodiversity and wildlife habitat, weakening ecological resilience.

- **Scientific Evidence:** Research from the LA UFAC shows structure separation—not vegetation separation—is the key factor in preventing structure-to-structure wildfire spread.
- **Heritage and Identity:** Pasadena’s “Tree City” status and its historic landscapes, including the Tournament of Roses, La Casita Del Arroyo, and the Gamble House, would be at risk.
- **Financial Burden:** Removal of trees and vegetation across municipal, residential, and commercial properties would impose significant costs on property owners and the City.

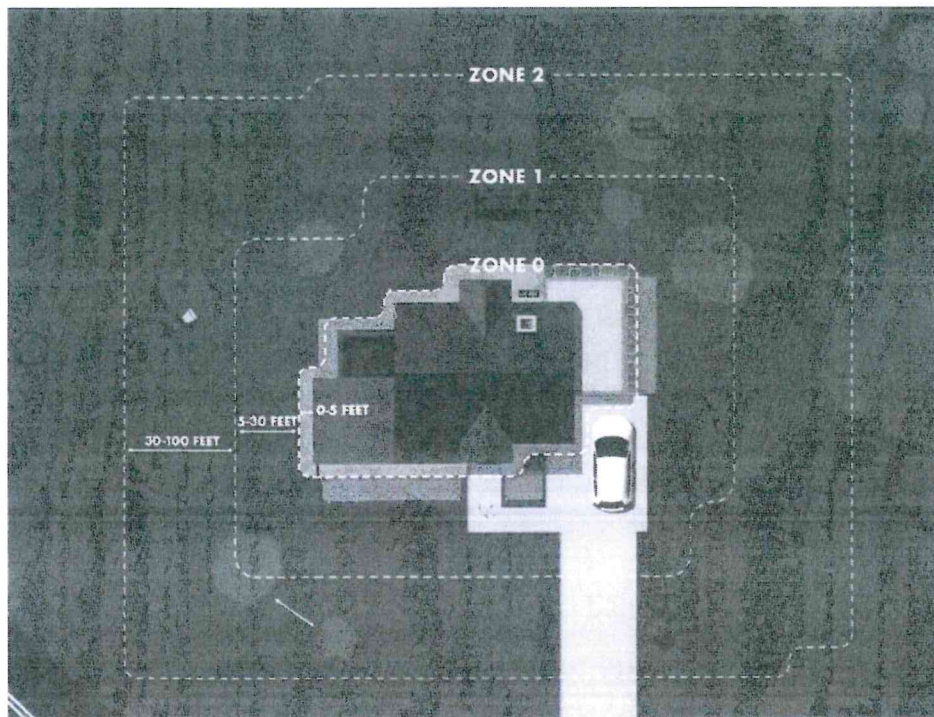
The Pasadena Environmental Advisory Commission urges the City Council to support a locally adaptive approach to wildfire resilience that safeguards public safety while preserving Pasadena’s ecological and cultural heritage. The proposed statewide “Zone 0” regulation imposes a one-size-fits-all standard that overlooks local conditions and proven fire management practices. By maintaining local authority, Pasadena can continue applying science-based strategies that reduce fire risk, protect its tree canopy, and uphold the city’s identity as a leader in sustainable urban stewardship.

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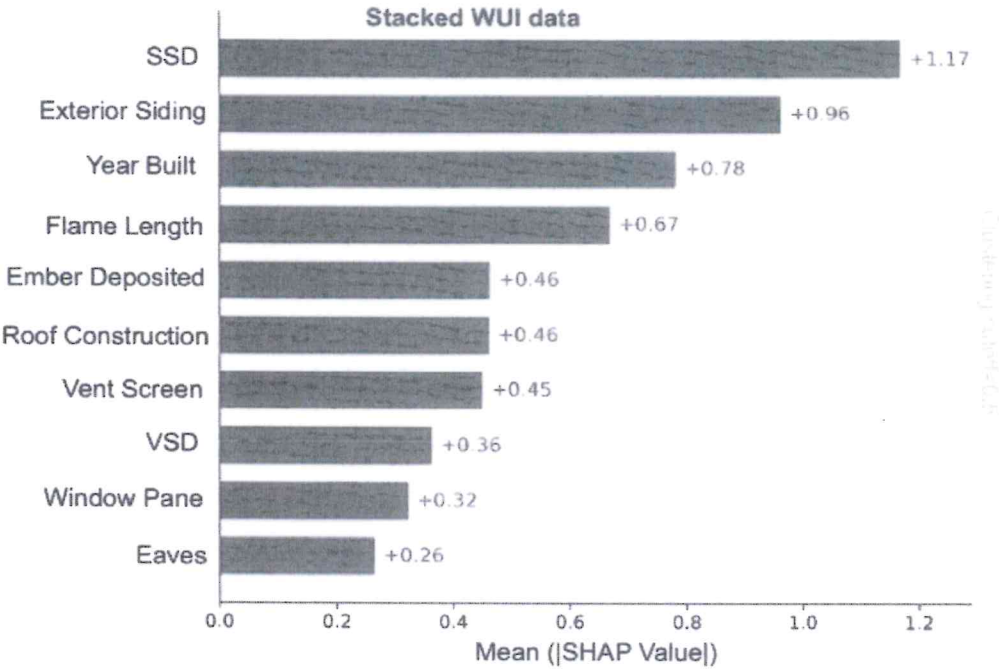
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SHAP aggregation results characterizing the contribution of features for the entire (stacked) WUI data from five fires. SSD is short for Structure Separation Defense. VSD is short for Vegetation Separation Defense



Sabha, Tamer

From: Jessica Richards
Sent: Tuesday, February 3, 2026 1:33 PM
To: Sabha, Tamer
Subject: Legislative committee written comment 2/3 Zone Zero - please distribute
Attachments: Pasadena-Altadena-ZZ-coalition-letter-final_signed-logos adds.pdf

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Thank you for taking up this critical issue. Yes, we want to mitigate fire risk and we need to follow independent research to guide those policies.

The Board of Forestry is poised to handover more power to the private insurance industry that is already wrecking havoc on the lives of Californians. I am hoping you will stand up for the residents of Pasadena. The Board strongly favors the insurance industry crafted option 1 for plants requiring all vegetation be removed in the area immediately around one's home and replace it with gravel, concrete, pavers, etc. 10 potted plants in 5 gallon or less noncombustible pots with plants less than 18" tall and separated by a distance of at least 18" and kept away from doors, vents and windows. So what do the relevant, independent experts say about this?

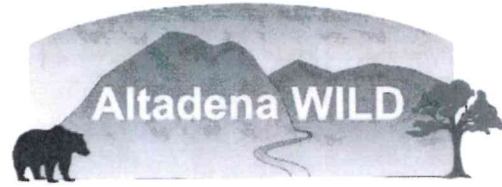
Each week, Nurit Katz, Director of Sustainability for UCLA hosts a call featuring a diverse array of experts from across the state. I have been listening to these calls. After months and dozens of experts sharing research and testimony what is clear is that the most stringent Option 1 is not supported by the experts. In fact, it is unanimous. So why then would the Board of Forestry ignore California's own expertise, independent, double-peer reviewed science? I'll leave that for you to ponder but I'll mention that on a recent call Sasha Renee Perez shared the insurance lobby is the most powerful in Sacramento. They argue these regulations are necessary but provide no assurance that homeowners will be insured if they rip out all vegetation (the estimated cost is over \$15k per home). These draconian regulations, if enacted, will make homes in the very high risk fire severity zone hotter, drier, destabilize hillside slopes, decrease habitat, and increase energy costs. The insurance industry is scapegoating plants and creating a justification to deny claims and drop coverage if a single potted plant is out of place. Research shows other factors such as home hardening and proximity to the next structure are the most significant risk factors.

I implore you, like Los Angeles and Glendale, to codify Option 4 for plants allowing for healthy vegetation but removing the most risky components and Option 2 for trees to protect our iconic urban canopy while pruning away from chimneys. These options are consistent with what I've heard from dozens of experts and reduce risk by removing the agreed upon and research-backed factors such as wood piles and attached wood fences.

Thank you.

Jessica Richards

P.S. I'm attaching a coalition letter signed by six community associations regarding Zone Zero please distribute as well to the committee.



4 December 2025
 State Board of Forestry and Fire Protection
 715 P Street, 10th Floor
 Sacramento, California

Re: Zone 0 Regulation

Dear Chair and Members,

Our neighborhood organizations represent thousands of Pasadena and Altadena households living in residential neighborhoods designated as Very High Fire Hazard Severity Zones and allied neighborhoods who strongly oppose the blanket removal of healthy, maintained, and hydrated vegetation within five feet of structures.

We appreciate the opportunity to provide formal comment on the California Board of Forestry and Fire Protection’s proposed regulations for the “Zone 0” ember-resistant zone within five feet of structures in fire-prone areas.

We strongly support the State’s goal of enhancing community wildfire resilience. However, we urge the Board to adopt an approach that allows flexibility for local jurisdictions and reflects regional differences unique to Southern California’s urban Wildland-Urban Interface (WUI).

We strongly urge that the Board adopt **Vegetation Option 4** and **Tree Option 2** as presented in the October 23, 2025 draft rule package.

Vegetation Option 4 – Well-Maintained Plants Allowed

Option 4 provides the appropriate balance between safety and ecological stewardship. This approach allows potted and in-ground vegetation that is well-maintained and hydrated while prohibiting dead or combustible materials, such as dry weeds or wood mulches.

This method aligns with science-based research (Escobedo et al, 2025) showing that plant health and moisture content—not the mere presence of greenery—are key predictors of fire spread. Healthy vegetation can also provide cooling benefits, erosion control, and protection against wind-driven embers, which are especially relevant in Pasadena’s and Altadena’s hillside communities.

Tree Option 2 – Well-Maintained Trees with Clearances

Tree Option 2 provides a reasonable standard that maintains appropriate clearance from chimneys and roofs while recognizing the importance of trees in urban areas. Trees play a critical role in heat mitigation, erosion control, air quality, and the provision of habitat. Our community supports this approach as it maintains safety without imposing unnecessary removals that could harm biodiversity or conflict with local tree ordinances.

Preserve Local Authority within the Local Responsibility Area (LRA)

We also strongly urge the Board to allow local control within LRAs, consistent with the “alternatives” language included in the draft rule.

Local discretion ensures that defensible space policies are effective, enforceable, and compatible with existing municipal codes, environmental protections, historic preservation ordinances and community expectations.

If the Boards finds that a single set of regulations is desired, then the least restrictive options (options 4 and 2) are advisable to prevent ecologically and financially costly regulatory overreach.

Financial burden and Insurability

Many homes were only recently added to Very High Fire Hazard Severity Zones. Zone 0 imposes costly, unfunded mandates on residents and local governments. Risk of mandatory clearances, fines and liens presented by these regulations are a burden to local municipalities and homeowners.

These regulations, while framed as boosting insurability, do not guarantee coverage. After thousands of dollars (\$13,000 average cited by BOF) are spent to comply, there is no assurance that insurance carriers will provide coverage. These regulations will increase insurance challenges for homeowners who will face additional, costly hurdles to *potentially* gain coverage. The challenges related to insurance coverage in California are very real and complex but should be navigated through separate legislation.

Conclusion

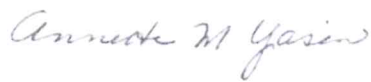
As residents in the Very High Risk Fire Severity Zones and adjacent areas, we share the goal of wildfire risk reduction through home hardening, vegetation management, and community education. We respectfully request that the Board of Forestry:

1. Adopt **Vegetation Option 4** and **Tree Option 2** as part of the final Zone 0 rule; and
2. Preserve **local control and flexibility for LRA jurisdictions** to apply tailored compliance approaches through local fire departments.
3. Ensure any further regulations or guidelines shall have **full, statewide representation**. Only having a northern California technical advisor minimizes the significant differences of Southern California neighborhoods and further discounts the geographic, and

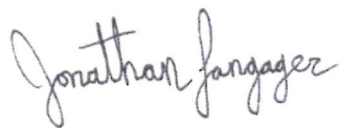
environmental differences across our great state. A technical advisory committee that is representative of the whole state with scientists from more than one county is essential to developing a comprehensive and well-crafted policy to address the challenges we face.

We urge the Board to prioritize scientific integrity and local consultation over speed, ensuring that regulatory deadlines do not override the call for a more thoughtful, locally informed approach. Additionally, passage of AB 1455 must not impose a rushed implementation with costly consequences.

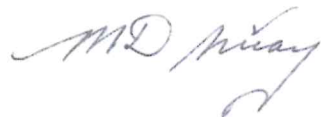
Thank you for considering our feedback on this critical matter. We appreciate the Board's continued collaboration with local municipalities and local fire agencies in developing practical, balanced, science-informed defensible space regulations that improve safety while protecting the environment.



Annette Yasin
President, Bungalow Heaven Neighborhood Association



Jonathan Langager
Chair, Garfield Heights Neighborhood Association



Michael D. Bicay, Ph.D.
President, Altadena WILD Inc.



Eric Kern
President, LVAA Linda Vista/Annandale Association



David Quigg
President, San Rafeal Hills



Bridget Lawlor, Ph.D.
Executive Director, Pasadena Heritage

Sabha, Tamer

From: cityclerk
Sent: Tuesday, February 3, 2026 3:48 PM
To: Iraheta, Alba; Jomsky, Mark; Robles, Sandra; Sabha, Tamer; McMillan, Acquanette (Netta); Soo, Christine
Subject: FW: Zone Zero
Attachments: ZoneZero_PH.pdf

From: Bridget Lawlor <
Sent: Tuesday, February 3, 2026 3:47:32 PM (UTC-08:00) Pacific Time (US & Canada)
To: cityclerk <cityclerk@cityofpasadena.net>
Subject: Zone Zero

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Please see our attached letter.

Best,
Bridget

--



Bridget Lawlor, Ph.D.
Executive Director



160 N. Oakland Avenue Pasadena, CA 91101

www.pasadenaheritage.org



Dear Members of the Legislative Committee,

Pasadena Heritage shares the Legislature's commitment to protecting lives and communities from wildfire risk, particularly in the wake of recent devastating fires across California. We write to express concern about the pending implementation of Zone Zero legislation as it is currently proposed, and to urge a more nuanced, science-based approach that reflects the realities of fire behavior in urban and historic communities such as Pasadena and Altadena.

Zone Zero was developed in response to catastrophic wildland fires, including the Tubbs Fire (2017) and the Paradise Fire (2018). However, its current framework relies on assumptions about fire spread that do not consistently align with conditions in built, suburban, and urban neighborhoods. Increasingly, research and on-the-ground experience show that fires in these settings are largely structure- and ember-driven rather than vegetation-driven. As articulated by Altadena Green through public education efforts and community discussions, treating developed neighborhoods as if they were wildlands overlooks critical differences in ignition sources, fuel loads, and fire dynamics.

Evidence from the January 2025 Eaton Fire in Altadena underscores the need for this distinction. Aerial imagery demonstrates that healthy, well-maintained trees and vegetation often survived while adjacent structures burned. Large, high-moisture trees, including oaks, pines, and deodar cedars, frequently resisted ignition and likely reduced fire intensity by acting as windbreaks against ember showers. In many instances, vegetation that did burn appears to have been ignited by nearby buildings, which burn hotter and provide significantly greater fuel loads than landscaping. Notably, many homes that had already removed surrounding vegetation still burned.

Pasadena Heritage supports common-sense fire safety measures, including the removal of combustible debris such as dead leaves and pine needles from yards and gutters, as well as the maintenance of defensible space. However, consistent with the position advanced by Altadena Green and other fire-ecology advocates, healthy, well-watered vegetation presents far less risk than is often assumed and provides substantial protective and environmental benefits. Fire mitigation policies should therefore prioritize strategies that directly address how fires spread in urban settings, including ember-resistant venting, fire-resistant roofing, non-combustible siding, double-pane windows, and targeted home hardening measures.

The widespread removal of vegetation adjacent to buildings would also create cascading environmental and public health impacts. Loss of tree canopy and plantings, particularly those that shade walls and windows, would intensify urban heat islands, increase reliance on energy-intensive air conditioning, degrade air quality, and heighten flood risk through reduced water absorption and soil stabilization. These impacts would fall most heavily on communities already

facing disproportionate climate burdens, undermining goals of environmental equity and climate resilience.

Zone Zero, as currently drafted, also conflicts with existing environmental standards, including CALGreen shade requirements for schools, and runs counter to broader climate adaptation strategies that recognize trees as essential infrastructure. Mature urban trees play a critical role in cooling neighborhoods, improving air quality, supporting biodiversity, and strengthening community resilience in the face of climate change.

Pasadena Heritage does not oppose defensible space requirements in principle. Rather, we urge an approach that reflects local conditions, scientific evidence, and the unique characteristics of mature, developed communities. Presently, the Board of Forestry has options within the proposed regulation that would better achieve these goals. Option 4 for vegetation and Option 2 for trees would provide meaningful defensible space while preserving the character, environmental benefits, and climate resilience of historic urban neighborhoods. Hydration and maintenance are essential components of risk reduction, and local knowledge and control are more appropriate than a blanket statewide standard.

The devastating fires of recent years demand thoughtful, evidence-based responses that protect lives while strengthening ecological and community resilience. Pasadena Heritage respectfully urges policymakers to advance fire mitigation strategies that align with climate adaptation principles, prioritize home hardening in urban areas, and recognize trees and healthy landscapes as essential components of safe, livable communities.

Thank you for your time and thoughtful consideration of this important issue.

Respectfully,

Bridget Lawlor

Bridget Lawlor, Ph.D.
Executive Director
Pasadena Heritage

Sabha, Tamer

From: Harvey-Williams, Brenda
Sent: Monday, March 2, 2026 5:29 PM
To: Jomsky, Mark; Martinez, Ruben
Cc: Sabha, Tamer
Subject: FW: Pasadena Beautiful weighs in on Zone Zero
Attachments: PBF position on Zone Zero.pdf

Hi Ruben, please include this with public comment for the April Leg. Policy meeting.

Thanks,

Brenda E. Harvey-Williams

Assistant City Manager

626-744-3718

bharvey-williams@cityofpasadena.net



From: Sara Edwards ·
Sent: Monday, March 2, 2026 4:07 PM
To: Harvey-Williams, Brenda <bharvey-williams@cityofpasadena.net>
Subject: Pasadena Beautiful weighs in on Zone Zero

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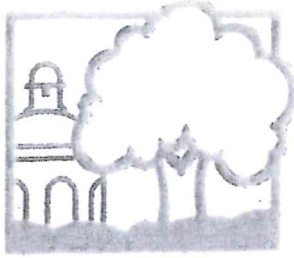
Attention office of the City Manager:

Attached is our position paper on Zone Zero. Please read. We will be at the legislative meeting Tuesday March 3.

Regards,
Sara Edwards
PBF President

--

Sara Edwards



Pasadena Beautiful Foundation

"Protecting Our Trees"

March 3, 2026

The Honorable Victor Gordo and Members of the City Council
Pasadena City Council
City of Pasadena
100 N. Garfield Ave.
Pasadena, CA 91101

Re: Zone Zero Implementation

Dear Mayor Gordo and Council Members:

As you know, the Pasadena Beautiful Foundation has long championed the protection and expansion of trees and green space throughout our city. We have valued the opportunity to work alongside many of you, as well as our dedicated Parks and Recreation staff, to strengthen and sustain Pasadena's urban canopy. In keeping with our mission, we write to express serious concerns regarding the pending implementation of the proposed Zone Zero legislation as it is currently drafted.

We fully share the City's commitment to protecting lives and neighborhoods from wildfire risk. The devastating fires of January 2025, which destroyed thousands of homes and claimed multiple lives, underscore the urgency of thoughtful and effective fire prevention policy. Public safety must remain paramount.

However, as currently written, the proposed Zone Zero standards are overly restrictive and risk unintended consequences for Pasadena's urban forest. Research on fire behavior in residential areas consistently shows that structure ignition and wind-driven embers are the primary drivers of home loss, rather than well-maintained vegetation. Policies that focus narrowly on vegetation removal, without equal emphasis on structure hardening and ember resistance, may fail to address the most significant risks.

Pasadena Beautiful respectfully urges the Council to consider local amendments that reflect both fire science and Pasadena's unique urban character. We support practical, evidence-based fire safety measures, including:

- Removal of dead or highly combustible vegetation
- Routine clearing of debris from yards, roofs, and gutters

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Vice President -- Susan Osen
Secretary -- Patricia Lyon &
Joyce McGilvray
Treasurer -- John Poer
Past President
Greg King
Nominating
Brad Hanson
Ex Officio At Large
Chuck Livingstone

Tree Program Chair
Emina Darakjy

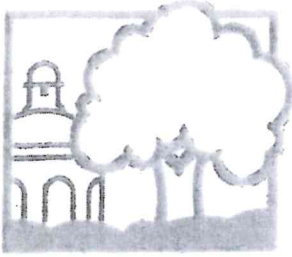
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Teri Weeks
Polly Wheaton



Pasadena Beautiful Foundation

"Protecting Our Trees"

- Elimination of flammable materials such as dry weeds and combustible mulch near structures
- Realistic, defensible space standards that prioritize maintenance over wholesale vegetation and tree removal

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 Betsy Tyler
 Teri Weeks
 Polly Wheaton

We also encourage alignment with the more balanced regulatory approaches under consideration by the Board of Forestry. In particular, options that allow for well-maintained, hydrated vegetation while requiring the removal of combustible debris represent a reasonable path forward. These approaches maintain safety standards—such as appropriate clearance from roofs and chimneys—while recognizing the critical role that mature trees play in urban environments.

Healthy trees provide shade, reduce extreme heat, improve air quality, manage stormwater, and contribute significantly to neighborhood character and property values. In a city increasingly vulnerable to rising temperatures, preserving canopy cover is not merely aesthetic—it is a public health and climate resilience strategy.

Fire prevention and tree preservation are not mutually exclusive goals. With careful drafting and science-based standards, Pasadena can protect residents from wildfire risk while safeguarding the environmental and community benefits that define our city.

Pasadena Beautiful respectfully urges the Council to advance fire prevention policies that recognize trees and healthy landscapes as essential components of safe, resilient, and liveable communities.

Thank you for your time and thoughtful consideration of this important matter.

Respectfully,

 Sara Edwards
 President
 Pasadena Beautiful Foundation

Sabha, Tamer

From: Jessica Richards
Sent: Monday, April 6, 2026 9:13 AM
To: Harvey-Williams, Brenda; cityclerk; Sabha, Tamer
Subject: Legislative committee written comment 4/7 Zone Zero - please distribute
Attachments: Pasadena-Altadena-ZZ-coalition-letter-final_signed-logos adds.pdf; EAC - Final Zone 0 Memorandum to City Council.pdf

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Thank you for taking up this critical issue. Yes, we want to mitigate fire risk and we need to follow independent research to guide those policies.

The Board of Forestry is poised to handover more power to the private insurance industry that is already wrecking havoc on the lives of Californians. I am hoping you will stand up for the residents of Pasadena. The Board strongly favors the insurance industry crafted option 1 for plants requiring all vegetation be removed in the area immediately around one's home and replace it with gravel, concrete, pavers, etc. 10 potted plants in 5 gallon or less noncombustible pots with plants less than 18" tall and separated by a distance of at least 18" and kept away from doors, vents and windows. So what do the relevant, independent experts say about this?

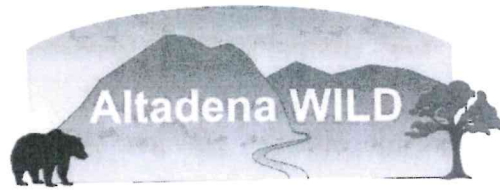
Each week, Nurit Katz, Director of Sustainability for UCLA hosts a call featuring a diverse array of experts from across the state. I have been listening to these calls. After months and dozens of experts sharing research and testimony what is clear is that the most stringent Option 1 is not supported by the experts. In fact, it is unanimous. So why then would the Board of Forestry ignore California's own expertise, independent, double-peer reviewed science? I'll leave that for you to ponder but I'll mention that on a recent call Sasha Renee Perez shared the insurance lobby is the most powerful in Sacramento. They argue these regulations are necessary but provide no assurance that homeowners will be insured if they rip out all vegetation (the estimated cost is over \$15k per home). These draconian regulations, if enacted, will make homes in the very high risk fire severity zone hotter, drier, destabilize hillside slopes, decrease habitat, and increase energy costs. The insurance industry is scapegoating plants and creating a justification to deny claims and drop coverage if a single potted plant is out of place. Research shows other factors such as home hardening and proximity to the next structure are the most significant risk factors.

I implore you, like Los Angeles and Glendale, to codify Option 4 for plants allowing for healthy vegetation but removing the most risky components and Option 2 for trees to protect our iconic urban canopy while pruning away from chimneys. These options enforceable and consistent with what I've heard from dozens of experts and reduce risk by removing the agreed upon and research-backed factors such as dead vegetation, wood piles and attached wood fences.

Thank you.

Jessica Richards,
Vice President of Bungalow Heaven Neighborhood Association and Urban Forestry Advisory
Commissioner
(Writing in my personal capacity)

P.S. I'm attaching a coalition letter signed by six community associations regarding Zone Zero as well as the EAC'd advisory letter please distribute as well to the committee.



PASADENA
HERITAGE
PRESERVATION | ADVOCACY | EDUCATION

4 December 2025
State Board of Forestry and Fire Protection
715 P Street, 10th Floor
Sacramento, California

Re: Zone 0 Regulation

Dear Chair and Members,

Our neighborhood organizations represent thousands of Pasadena and Altadena households living in residential neighborhoods designated as Very High Fire Hazard Severity Zones and allied neighborhoods who strongly oppose the blanket removal of healthy, maintained, and hydrated vegetation within five feet of structures.

We appreciate the opportunity to provide formal comment on the California Board of Forestry and Fire Protection’s proposed regulations for the “Zone 0” ember-resistant zone within five feet of structures in fire-prone areas.

We strongly support the State’s goal of enhancing community wildfire resilience. However, we urge the Board to adopt an approach that allows flexibility for local jurisdictions and reflects regional differences unique to Southern California’s urban Wildland-Urban Interface (WUI).

We strongly urge that the Board adopt **Vegetation Option 4** and **Tree Option 2** as presented in the October 23, 2025 draft rule package.

Vegetation Option 4 – Well-Maintained Plants Allowed

Option 4 provides the appropriate balance between safety and ecological stewardship. This approach allows potted and in-ground vegetation that is well-maintained and hydrated while prohibiting dead or combustible materials, such as dry weeds or wood mulches.

This method aligns with science-based research (Escobedo et al, 2025) showing that plant health and moisture content—not the mere presence of greenery—are key predictors of fire spread. Healthy vegetation can also provide cooling benefits, erosion control, and protection against wind-driven embers, which are especially relevant in Pasadena’s and Altadena’s hillside communities.

Tree Option 2 – Well-Maintained Trees with Clearances

Tree Option 2 provides a reasonable standard that maintains appropriate clearance from chimneys and roofs while recognizing the importance of trees in urban areas. Trees play a critical role in heat mitigation, erosion control, air quality, and the provision of habitat. Our community supports this approach as it maintains safety without imposing unnecessary removals that could harm biodiversity or conflict with local tree ordinances.

Preserve Local Authority within the Local Responsibility Area (LRA)

We also strongly urge the Board to allow local control within LRAs, consistent with the “alternatives” language included in the draft rule.

Local discretion ensures that defensible space policies are effective, enforceable, and compatible with existing municipal codes, environmental protections, historic preservation ordinances and community expectations.

If the Boards finds that a single set of regulations is desired, then the least restrictive options (options 4 and 2) are advisable to prevent ecologically and financially costly regulatory overreach.

Financial burden and Insurability

Many homes were only recently added to Very High Fire Hazard Severity Zones. Zone 0 imposes costly, unfunded mandates on residents and local governments. Risk of mandatory clearances, fines and liens presented by these regulations are a burden to local municipalities and homeowners.

These regulations, while framed as boosting insurability, do not guarantee coverage. After thousands of dollars (\$13,000 average cited by BOF) are spent to comply, there is no assurance that insurance carriers will provide coverage. These regulations will increase insurance challenges for homeowners who will face additional, costly hurdles to *potentially* gain coverage. The challenges related to insurance coverage in California are very real and complex but should be navigated through separate legislation.

Conclusion

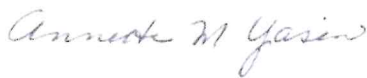
As residents in the Very High Risk Fire Severity Zones and adjacent areas, we share the goal of wildfire risk reduction through home hardening, vegetation management, and community education. We respectfully request that the Board of Forestry:

1. Adopt **Vegetation Option 4** and **Tree Option 2** as part of the final Zone 0 rule; and
2. Preserve **local control and flexibility for LRA jurisdictions** to apply tailored compliance approaches through local fire departments.
3. Ensure any further regulations or guidelines shall have **full, statewide representation**. Only having a northern California technical advisor minimizes the significant differences of Southern California neighborhoods and further discounts the geographic, and

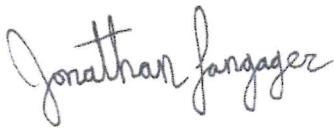
environmental differences across our great state. A technical advisory committee that is representative of the whole state with scientists from more than one county is essential to developing a comprehensive and well-crafted policy to address the challenges we face.

We urge the Board to prioritize scientific integrity and local consultation over speed, ensuring that regulatory deadlines do not override the call for a more thoughtful, locally informed approach. Additionally, passage of AB 1455 must not impose a rushed implementation with costly consequences.

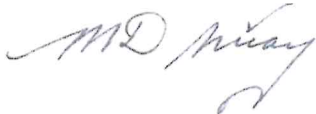
Thank you for considering our feedback on this critical matter. We appreciate the Board's continued collaboration with local municipalities and local fire agencies in developing practical, balanced, science-informed defensible space regulations that improve safety while protecting the environment.



Annette Yasin
President, Bungalow Heaven Neighborhood Association



Jonathan Langager
Chair, Garfield Heights Neighborhood Association



Michael D. Bicay, Ph.D.
President, Altadena WILD Inc.



Eric Kern
President, LVAA Linda Vista/Annandale Association



David Quigg
President, San Rafael Hills



Bridget Lawlor, Ph.D.
Executive Director, Pasadena Heritage

MEMORANDUM

From: Pasadena Environmental Advisory Commission
Date: October 25, 2025
To: Members of the Pasadena City Council and Municipal Services Committee
Subject: Zone 0 Recommendation

Executive Summary

The Pasadena Environmental Advisory Commission (EAC) recommends the following distinctions to the proposed State regulations, based on research conducted by the City of Los Angeles Forestry Commission:

1. Allow flexibility for the Pasadena Fire Department and its inspectors to implement fire severity zones based on local conditions.
 2. Exempt all well-maintained vegetation and trees from mandatory removal, and establish an appeal process.
 3. Recommend regionally appropriate vegetation management practices that preserve and restore native species, prioritize fire-adapted natives where appropriate, and emphasize maintenance and irrigation.
 4. Explicitly exempt locally protected native trees and shrubs from all new regulations.
 5. Explicitly exempt well-maintained historic gardens and heritage trees.
 6. Prohibit the use of artificial turf within defensible space areas, as artificial turf generates extreme heat and emits toxic fumes when ignited, posing health risks to first responders.
-

Background

On June 23, the Pasadena City Council adopted Fire Hazard Severity Zone maps that empower the Pasadena Fire Department to mitigate wildfire risks while maintaining ecological health. The maps establish zones with increasing levels of protection and spacing requirements to prevent wind-driven fires from spreading between buildings, as seen during the Eaton Fire on January 7.

The California Board of Forestry now proposes adding a new “Zone 0,” which would prohibit nearly all trees, shrubs, lawns, ground vegetation, and artificial turf within five feet of any structure, with limited exceptions. This shifts the focus from an “ember-resistant zone” to a “non-combustible zone,” a change that has generated significant concern. The statewide

regulation would override local ordinances and fail to account for local vegetation, housing density, and wind conditions.

Public and Regional Response

The Board of Forestry has held statewide hearings on Zone 0, including a September 18 meeting at the Pasadena Civic Auditorium where hundreds of residents expressed concern following the Eaton Fire. Commissioners from the EAC have attended these sessions and consulted with fire prevention and sustainability experts, including Nurit Katz of UCLA, to evaluate the scientific basis of the proposal.

On October 7, the Los Angeles City Council, supported by the Los Angeles Fire Department and Los Angeles Urban Forest Advisory Committee (UFAC), voted unanimously to oppose Zone 0, citing the loss of local control and negative impacts on urban canopy, heat mitigation, and environmental health. On October 21, the Ventura County Board of Supervisors also unanimously opposed the proposal, urging restoration of local control and funding for regionally adaptable implementation.

Pasadena EAC Position

The EAC recommends that the Pasadena City Council take a similar position opposing the proposed Zone 0 regulation and maintaining local control under the Pasadena Fire Department to preserve well-managed trees and vegetation and uphold existing local ordinances.

Key Impacts of Zone 0

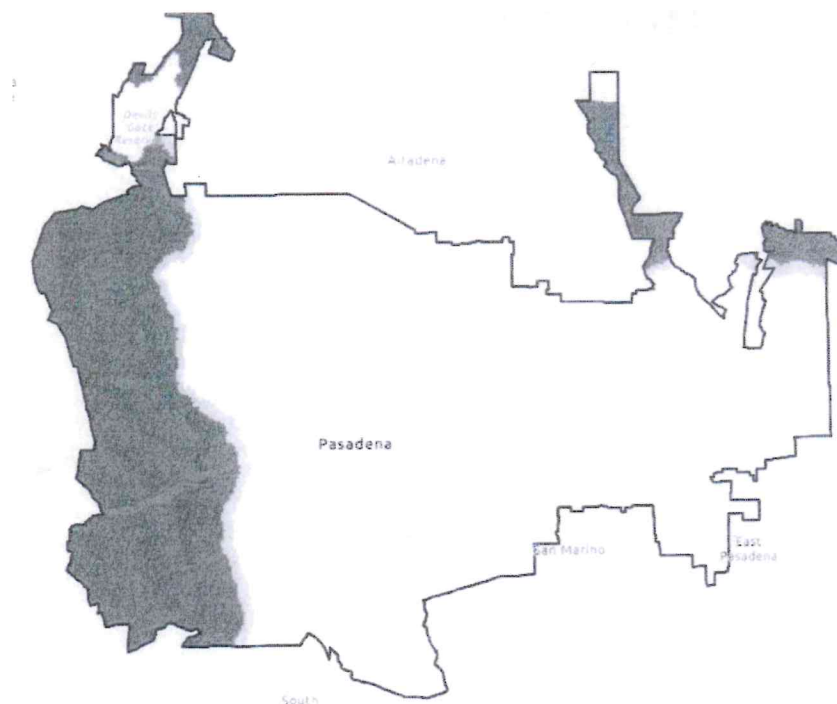
- **Loss of Natural Protections:** Trees reduce wind, capture embers, retain soil moisture, and stabilize hillsides which are critical protections against post-fire erosion, landslides and drought.
- **Loss of Tree Canopy and Increased Heat:** Removing all vegetation within five feet of structures would significantly reduce Pasadena's tree canopy, increase temperatures, energy use, and urban heat island effects.
- **Environmental Justice Impacts:** Low-income neighborhoods with smaller lots and closely spaced buildings would be disproportionately affected by increased heat and reduced shade.
- **Loss of Biodiversity and Habitat:** Vegetation removal would diminish biodiversity and wildlife habitat, weakening ecological resilience.

- **Scientific Evidence:** Research from the LA UFAC shows structure separation—not vegetation separation—is the key factor in preventing structure-to-structure wildfire spread.
- **Heritage and Identity:** Pasadena’s “Tree City” status and its historic landscapes, including the Tournament of Roses, La Casita Del Arroyo, and the Gamble House, would be at risk.
- **Financial Burden:** Removal of trees and vegetation across municipal, residential, and commercial properties would impose significant costs on property owners and the City.

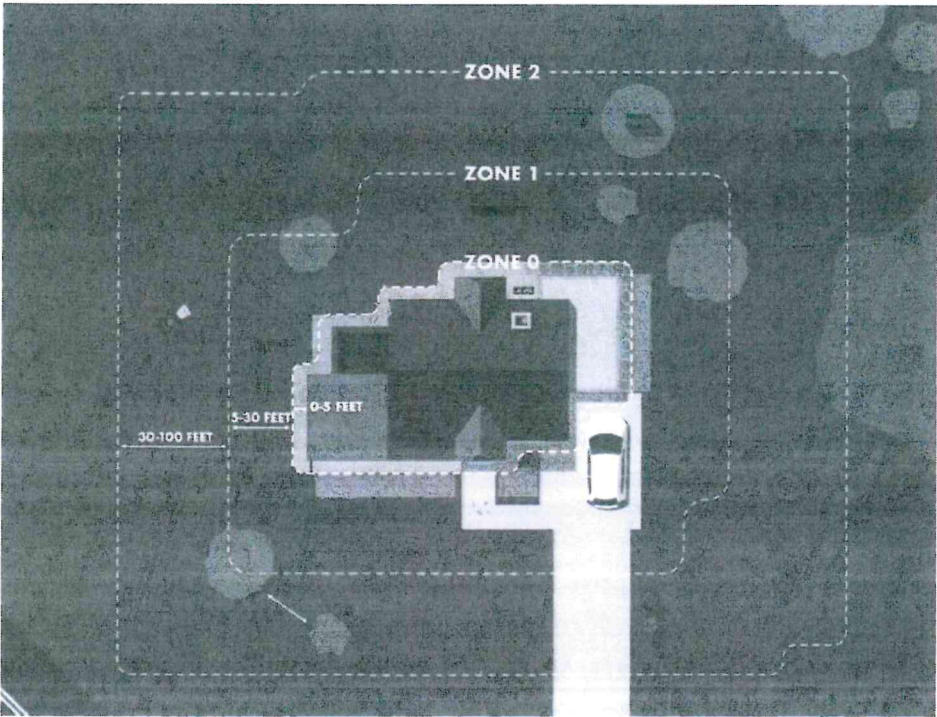
The Pasadena Environmental Advisory Commission urges the City Council to support a locally adaptive approach to wildfire resilience that safeguards public safety while preserving Pasadena’s ecological and cultural heritage. The proposed statewide “Zone 0” regulation imposes a one-size-fits-all standard that overlooks local conditions and proven fire management practices. By maintaining local authority, Pasadena can continue applying science-based strategies that reduce fire risk, protect its tree canopy, and uphold the city’s identity as a leader in sustainable urban stewardship.

Appendices:

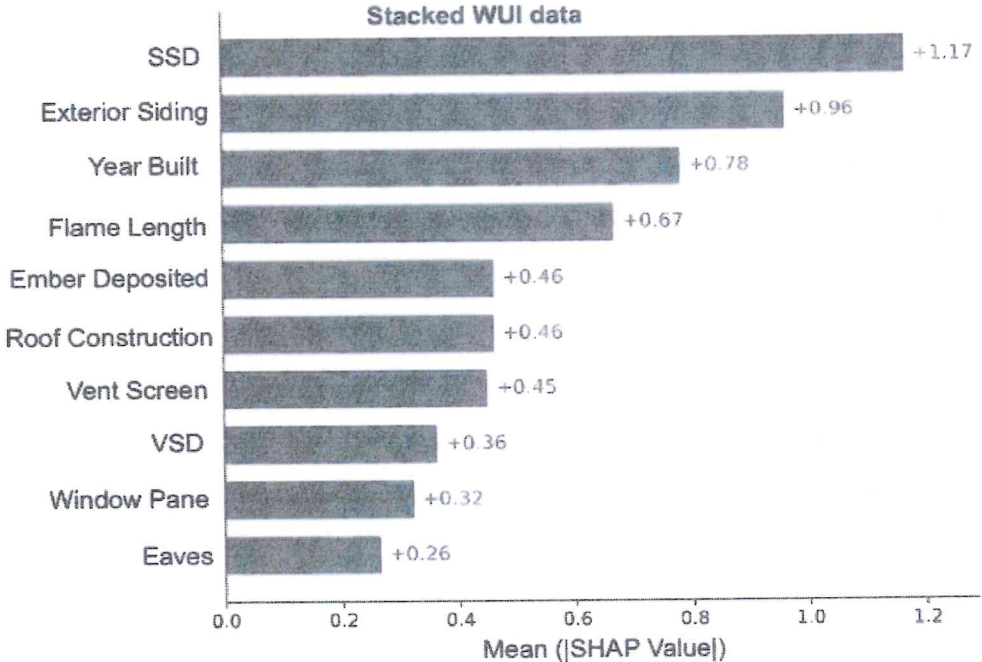
The new Fire Hazard Severity Maps are divided into zones with increasing levels of protection and distance from buildings:



The new Zone 0 is proposed to prohibit trees (with limited exceptions) and all ground vegetation, shrubs, lawns, and artificial turf within a five-foot buffer of every building:



SHAP aggregation results characterizing the contribution of features for the entire (stacked) WUI data from five fires. SSD is short for Structure Separation Defense. VSD is short for Vegetation Separation Defense



Sabha, Tamer

From: cityclerk
Sent: Tuesday, April 7, 2026 1:15 PM
To: Iraheta, Alba; Jomsky, Mark; Robles, Sandra; Sabha, Tamer; McMillan, Acquanelle (Netta); Soo, Christine
Subject: FW: Public Comment - Pasadena Legislative Policy Committee Meeting 04/07/26
Attachments: Public Comment - Pasadena Legislative Policy Committee 04-07-26 Zone Zero.pdf

From: Yadi <
Sent: Tuesday, April 7, 2026 1:14:48 PM (UTC-08:00) Pacific Time (US & Canada)
To: cityclerk <CITYCLERK@cityofpasadena.net>; PublicComment-AutoResponse <correspondence@cityofpasadena.net>
Subject: Public Comment - Pasadena Legislative Policy Committee Meeting 04/07/26

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Hi,

Please find attached my public comment for the April 7, 2026 Pasadena Legislative Policy Committee Meeting, agenda item 2. Zone Zero.

Thanks,

Yadi

2. Zone Zero

Thank you for addressing Zone Zero regulations. I support calling for evidence-based, science-backed measures for wildfire prevention and mitigation efforts. Options 2 for trees and 4 for vegetation will provide Pasadena with flexibility to implement more tailored solutions for the various regions (and hazard levels) of the city.

Zone Zero has trickle effects for communities outside of the fire hazard zones. Communities such as mine that were in the direct path of a wildfire yet did not lose any homes should be examined to learn what factors helped protect homes and the community.

We are now being pressured by insurance companies to do “home hardening” and clear away a “defensible space” – even though we are not in a designated high fire hazard zone. We are left to comply on our own dime or risk being dropped by insurance carriers altogether. In the context of having survived the Kinneloa and the Eaton fires, this is heavy-handed and excessive. These measures will not guarantee we’ll survive future wildfires, and will not guarantee we’ll remain insured – much less have affordable insurance. Moreover, implementing the strictest Zone Zero regulations will be ecologically devastating, and does not strike a balance or permit finding measured and meaningful alternative solutions.

Yadi

Pasadena Legislative Policy Committee

April 7 2026

2. Zone Zero