

**McMillan, Acquanette (Netta)**

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**From:** Jessica Richards  
**Sent:** Thursday, February 5, 2026 10:40 PM  
**To:** PublicComment-AutoResponse  
**Cc:** Cole, Rick; cityclerk  
**Subject:** 2/9 city council public comment re agenda item 7  
**Attachments:** Pasadena-Altadena-ZZ-coalition-letter-final\_signed-logos adds.pdf

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Hello,

I am Jessica Richards, Vice President of Bungalow Heaven Neighborhood Association and commissioner of the Urban Forestry Advocacy Committee, though I am making a public comment in my personal capacity,

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. Los Angeles and Glendale were proactive. The *wait and see approach is not advisable*.

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. only 10 potted plants are allowed as long as they are 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. After months and hearing 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 and independent, double-peer reviewed science? I'll leave that for you to ponder but I'll mention that on a recent call Senator Sasha Renee Pérez 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 up to \$100k

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, not the rosebushes!

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. No need to reinvent the wheel - 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 portions of wood fences.

This is not about aesthetics, despite my earned reputation as a tree lover - I am reasonable and if the science unequivocally supported the blanket removal of all vegetation in zone zero I would submit but the independent research actually shows well-hydrated vegetation can provide a *landscape buffer* and protect homes. Escobedo et al 2025 revealed homes with bare ground around them are *more likely* to suffer a total loss in fire events.

**Please do what's reasonable, enforecable and research-backed. Stand up stand for Pasadena and stand up to the insurance industry.**

Respectfully,

**Jessica Richards**

P.S. please post and distribute the attached letter as well signed by 6 community organizations.



## McMillan, Acquanette (Netta)

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**From:** Anne Laforti  
**Sent:** Saturday, February 7, 2026 4:46 AM  
**To:** PublicComment-AutoResponse  
**Subject:** Protecting Our Foothills: Why Zone Zero Would Harm Pasadena and Altadena Ecosystems

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Dear Pasadena City Council,

As a Pasadena resident deeply connected to the Altadena community, I am writing to express my concern about the proposed Zone Zero regulations. These rules, which would require the removal of healthy, well-maintained vegetation within five feet of structures, threaten the unique ecosystems and vital services of our San Gabriel foothills—especially in the wake of last year's fire.

### Why Zone Zero Is Harmful for Our Communities:

- **Ecosystem Services at Risk:** The foothills of Altadena and Pasadena are not just scenic—they provide essential cooling, erosion control, and habitat for countless species. Removing living, low-water plants would force residents and businesses to pave over these natural assets, increasing runoff, erosion, and flooding risks. Science shows that healthy, hydrated vegetation is key to slowing fire spread and protecting homes from embers.
- **Loss of Habitat and Biodiversity:** Zone Zero would mean a drastic loss of habitat for birds, pollinators, and other wildlife. Trees and native plants are critical for biodiversity, and their removal would disrupt the ecological balance that makes our foothills so vibrant.
- **Heat Island Effect:** Replacing greenery with pavement or gravel would intensify the heat island effect, raising temperatures across Pasadena and Altadena. Trees and plants help mitigate heat and improve air quality—without them, our region becomes hotter and less resilient to climate change.
- **Financial Burden Without Insurance Guarantees:** The regulations impose costly, unfunded mandates on residents and local governments, with no guarantee of improved insurance coverage. Many homeowners would face significant expenses—averaging \$13,000—without assurance that insurers will provide protection.

### A Smarter, Science-Based Approach:

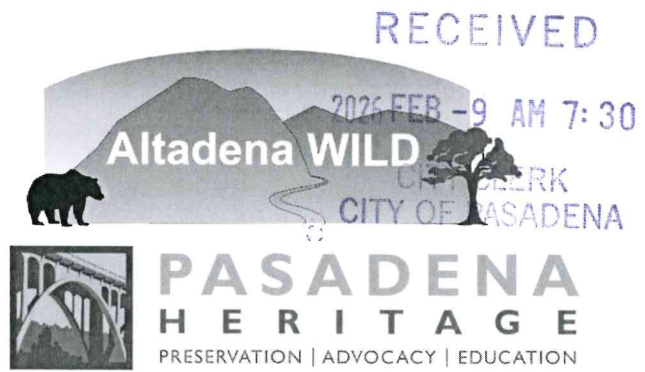
I urge decision-makers to adopt flexible, science-based options—such as Vegetation Option 4 and Tree Option 2—which allow for well-maintained, low-water plants and trees with appropriate clearances. These approaches balance safety with ecological stewardship, preserving the beauty and resilience of our foothills while protecting homes and businesses.

Local control and tailored compliance are essential. Our communities' unique geography and environmental needs must be respected, not overridden by one-size-fits-all mandates. Let's work together to create defensible space regulations that enhance wildfire resilience without sacrificing the natural assets that make Pasadena and Altadena special.

Thank you for considering the voices of residents, scientists, and local organizations in this critical decision. Please prioritize environmental protection, scientific integrity, and community consultation as we move forward.

Sincerely,  
Anne LaForti, MSc

Biomimic | Soil Nerd | Citizen Scientist  
Pasadena Resident & Altadena Community Advocate



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

## McMillan, Acquanette (Netta)

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**From:** Sam Berndt  
**Sent:** Monday, February 9, 2026 1:45 PM  
**To:** PublicComment-AutoResponse  
**Cc:** Hampton, Tyron; Cole, Rick; Jones, Justin; Masuda, Gene; Rivas, Jessica; Madison, Steve; Lyon, Jason; Gordo, Victor  
**Subject:** PASADENA 100 - Public Comment - Agenda Item 7: Federal and State Legislative Platforms for Calendar Year 2026

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Mayor and City Councilmembers,

On January 30, 2023, the City Council declared a climate emergency and set a goal to source 100% of Pasadena's electricity from carbon free sources by 2030. This goal was reaffirmed in the 2023 Integrated Resource Plan and the adopted 2025 Optimized Strategic Plan.

The State and Federal Legislative Platforms rightfully detail these ambitious and achievable goals and we applaud the platform positions including improving the availability of renewable energy, increasing energy efficiency, reducing greenhouse gas emissions, and including distributed generation resources in the renewable portfolio standards (RPS).

However, several platform positions fall in opposition of the council's climate & carbon-free policies, including: supporting energy derived from landfill gas (methane produced from decomposing waste), supporting the policy of administratively providing free emission allowances to retail electric utilities in proportion to their expected future emissions, advocating for legislation that decreases the burden of cap & invest regulations, advocating for changes to Net Energy Metering and Feed-In Tariff policy that decreases the incentive for solar customers, and advocating for limiting stranded fossil fuel investments.

In addition to the existing platform, several policy positions added to the platform would greatly enable the City's efforts in achieving its goals, including: supporting increased incentives for distributed energy generation (solar), supporting incentives for research & development and deployment of geothermal and long duration energy storage (LDES) projects, and advocating for incentives to meet state-mandated climate goals early.

In the wake of the Eaton Fire, an unmistakable reminder of the impacts of climate change in our community, it is paramount that as a city we build a united front to combat climate change and support the larger transition to carbon free electricity across the state and nation.

In solidarity,  
Sam Berndt  
On behalf of PASADENA 100

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February 9, 2026

Mayor Victor Gordo and Members of the City Council

City of Pasadena

100 N. Garfield Avenue

Pasadena, CA 91101

RE: Zone Zero (Item #07)

Dear Mayor Gordo and Council Members:

Pasadena Heritage shares the city'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

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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