

# MEMORANDUM



**To:**

California State Fire Marshal  
CAL FIRE / CNRA Leadership

**From:**

David Barrett  
Executive Director  
Safe Community Project  
(MySafe:LA and MySafe:Riverside Divisions)

**Date:**

March 27, 20206

**Subject:**

Zone 0 (AB 3074) – Field Observations, Community Response, and Policy Considerations from Southern California

## EXECUTIVE SUMMARY

This memorandum provides field-based observations and policy recommendations regarding the implementation of Zone 0 under AB 3074 (Public Resources Code §4291).

Based on extensive engagement across Southern California, the following conclusions are clear:

- Public resistance to the current Zone 0 framework is significant and persistent
- A statewide, uniform approach is not viable in dense Southern California WUI environments
- The proposed 2-foot / 3-foot subdivision of Zone 0 may increase confusion and reduce public trust
- Zone 0 alone cannot materially address structure loss in wind-driven, ember-dominant fire events
- Home hardening must be advanced separately (via CAL FIRE leadership) as a core component of true wildfire defense
- Local governments must play a central role in implementation, enforcement, and adaptation

The Safe Community Project will support the State’s final framework to the extent it is practical, implementable, and aligned with real-world conditions. However, refinement is necessary to ensure the policy achieves meaningful outcomes.

## **1. PURPOSE AND CONTEXT**

This memorandum reflects extensive field engagement, including direct interaction with more than 100 communities across Southern California, the development and activation of Fire Safe Councils and NFPA Firewise USA® sites, CAL FIRE QE-certified home assessments, wildfire recovery work in burn scar areas, and ongoing coordination with local fire departments, including the Los Angeles *City* Fire Department. The observations contained herein represent field intelligence derived from real-world conditions, not theoretical modeling.

## **2. STATUTORY AND POLICY FRAMEWORK**

Zone 0 is being developed under AB 3074 (2020), which directed the creation of an ember-resistant zone under Public Resources Code §4291. The Board of Forestry’s jurisdiction is limited to defensible space and does not extend to structural requirements such as home hardening. Related regulatory frameworks include California Building Code Chapter 7A and the California Wildland-Urban Interface Code (Title 24, Part 7), effective January 1, 2026.

**Key Constraint:** *The Board of Forestry cannot regulate structural hardening.*

**Policy Gap:** *Structural vulnerability remains the primary driver of structure loss in wildfire events.*

## **3. FOUNDATIONAL POSITION**

The Safe Community Project supports the Board of Forestry’s efforts and will support the final Zone 0 framework to the extent that it is reasonable, implementable, and aligned with real-world conditions. However, based on extensive field experience, refinement is required to ensure feasibility, clarity, and public acceptance.

## **4. CRITICAL FIELD OBSERVATIONS (KEY ISSUES)**

**A. Public Sentiment:** There is consistent and significant pushback from homeowners. A recurring concern is that feedback has been acknowledged but not meaningfully incorporated. The term “tone deaf” has been used in multiple community discussions.

**B. One Size Does NOT Fit All:** Southern California conditions include dense development, limited setbacks, and non-forested fuels. A uniform statewide approach is not viable.

**C. Structural Reality:** Homes built between 1960 and 2000 often integrate vegetation into design and are highly vulnerable to ember ignition. These represent wildfire blind spots.

**D. Policy Risk – 2-Foot / 3-Foot Split:** While legally structured, this approach risks increasing complexity and reinforcing perceptions of state overreach.

**E. Case Study – Pacific Palisades Fire (January 2025):** Over 6,500 structures were destroyed due to ember cast and structure-to-structure ignition. These conditions mirror those observed in the 1961 Bel Air Fire and demonstrate that Zone 0 alone would have had limited impact.

## **5. WHAT HOMEOWNERS ALREADY UNDERSTAND**

Homeowners understand that reducing combustible material reduces risk, that ember storms are a primary threat, and that vegetation condition matters. However, they strongly resist prescriptive, one-size mandates imposed at the state level and value both autonomy and aesthetics.

## **6. POLICY OPPORTUNITY: REFRAME THE APPROACH**

*There is an opportunity to shift from a compliance-based model toward a broader concept of 'Home Fire Defense,' integrating defensible space, home hardening, and community-level mitigation into a unified framework.*

## **7. RECOMMENDED POLICY DIRECTION**

**1. Local Implementation Authority:** The State should provide a framework while directing local jurisdictions to define and enforce Zone 0 based on geographic realities.

**2. CAL FIRE Leadership on Home Hardening:** CAL FIRE should lead statewide efforts to promote retrofitting and structural resilience, particularly for pre-2008 homes.

**3. Education First:** Prioritize education and voluntary compliance over immediate enforcement in dense communities.

**4. Expand Home Assessment Programs:** Scale CAL FIRE QE-certified inspections statewide.

**5. Community-Based Risk Model:** Promote Fire Safe Councils and Firewise USA® programs.

**6. Insurance Alignment:** Align policy with increasing insurance focus on community-level mitigation.

**7. Clear Vegetation Guidance:** Develop species-specific guidance and risk classifications.

**8. Core Principle:** *What burns matters.*

## **8. CWPP AND IMPLEMENTATION URGENCY**

MySafe:LA is authoring the first-ever Community Wildfire Protection Plan (CWPP) for the City of Los Angeles, including both a master plan and localized ancillary plans. Los Angeles County is also renewing its CWPP. Zone 0 guidance will *directly influence these documents,*

affecting public education, funding, and long-term policy decisions. Clarity is urgently required.

## **9. APRIL 2026 SOUTHERN CALIFORNIA ENGAGEMENT**

If the Board of Forestry conducts a public engagement in Southern California, we hope it will demonstrate clear evidence of progress and regional adaptation. Without this, the effort risks being perceived as a *negotiation over homeowner rights* and will likely generate significant public pushback.

## **10. ONGOING FIELD WORK AND DATA SHARING**

MySafe:LA and MySafe:Riverside continue to expand Fire Safe Councils and Firewise USA® sites while actively engaged in wildfire recovery within burn scar areas. This work provides real-time insights into vulnerabilities and mitigation gaps, which are shared with local fire departments, including the Los Angeles *City* Fire Department, creating a continuous feedback loop between community experience, fire operations, and policy development.

## **11. CONCLUSION**

A successful Zone 0 policy must be scientifically grounded, regionally adaptable, operationally feasible, and clearly understood by the public. The Safe Community Project remains committed to supporting the State through data sharing, implementation support, and continued community engagement.

A handwritten signature in black ink, appearing to read 'D. Barrett', written over a horizontal line.

David Barrett  
Executive Director

CC: Directors, Wildfire Members