

March 11, 2026

San Diego City Council
202 C Street, 10th Floor
San Diego, CA 92101

Re: Zone Zero Fire Policy

Dear Council President LaCava and City Councilmembers,

Representing the council and mayoral appointed City Forest Advisory Board, we are writing to request the City Council repeal its adoption of the Zone Zero policy in its current draft form.

The policy is still under development by the California Board of Forestry and Fire Protection and remains in draft form. **The City's adoption of the policy while in draft form is premature, poses significant impacts to the City's tree canopy, and creates ambiguity of the policy's specific requirements and enforcement.**

Of specific concern is the impact to the City's urban tree canopy under the new policy. The policy states:

"Trees are allowed in Zone 0 as long as they are properly maintained and regularly pruned. Healthy branches must be kept at least five feet from roofs and exterior walls. At maturity, the tree canopy (drip line) must be maintained at least ten feet from roofs and other structures, including chimneys and stovepipes. Dead or dying branches must be removed regularly."

Providing a five-foot clearance between tree branches and structures will **require the removal of many existing trees within the City limits and result in the omission of tree planting on new projects.** Due to the current and increasing density of San Diego, many properties simply do not have space for trees if branches cannot be located within five feet of structures.

Recent policies adopted by the City have encouraged urban infill and increased urban density while requiring developers to prioritize the creation of affordable housing units. Infill projects have especially little tree planting area, as priority is given to maximizing building size, particularly for housing. Often the only planting area provided is a small landscape strip between the building and public sidewalk. Zone Zero requirements will effectively eliminate these planting areas and tree planting locations. Future projects will have significantly fewer trees and will deprive our communities of the benefits trees offer; this is particularly troublesome for affordable housing communities.

In addition to the negative impact our communities will suffer under Zone Zero, **the restrictions on trees plantings have not been scientifically documented to improve fire safety.** Scientific evidence from wildfire research and post-fire assessments demonstrates that mature, hydrated trees do not pose an inherent ignition risk to structures. Large-diameter trunks and primary branches contain substantial internal moisture and require prolonged, high-intensity heat to ignite, conditions not typically produced by wind-borne embers alone. Observations from recent California wildfire events consistently show that trees are more often damaged by burning structures rather than serving as ignition sources for homes. Some studies suggest that tree canopies may intercept or deflect embers, reducing ember deposition on roofs, vents, and other vulnerable building components.

The Zone Zero policy is also problematic due to its ambiguous interpretation of what trees may be “exempted.” This creates the opportunity for insurance companies to become de facto interpreters and enforcers of Zone Zero regulations. This has already been experienced on development projects under way in San Diego, resulting in tree planting omissions.

A clear exemption for healthy, well-maintained, and irrigated trees is essential in “zone zero” regulations. **Tree removals and restrictions on new tree plantings would result in massive losses in the many valued and familiar benefits of trees,** including shade, cooling, lower energy use, wildlife, property value, aesthetics, social pleasures, and canopy goals identified in the City’s Climate Action Plan.

We urge the City Council to repeal its adoption of Zone Zero policy in its current draft form to avoid the unintended impacts to the City’s tree canopy, putting the enforceable CAP goals in question. We encourage the City to work with the California Board of Forestry and Fire Protection to review the policy from a multidisciplinary lens, rather than the myopic view of fire safety alone. We all seek the benefits of improved fire safety but believe these benefits can be reached without sacrificing the tree canopy of San Diego.

Thank you for your continuing support for planting and protecting trees and their benefits for our communities, residents, and visitors.

Sincerely,

City of San Diego’s Community Forest Advisory Board