



Board of Forestry and Fire Protection
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Adapting to Wildfire

Subject: Support for April 2026 Draft Zone 0 Regulation Language

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Dear Chair and Members of the Board,

Honorary Chair

Brian Colbert

On behalf of Fire Safe Marin’s Board of Directors, I am writing to express our strong support for the April 2026 draft Zone 0 regulations.

Executive Committee

President

Todd Lando

Fire Safe Marin, the nation’s first and longest-serving Fire Safe Council, works at the resident, neighborhood, and landscape scale to reduce wildfire risk in one of the most densely populated wildland urban interface regions in California. Our work focuses on home hardening and defensible space education, along with direct engagement with residents and local governments to support implementation of wildfire mitigation practices. We work closely with our partner fire agencies, who are responsible for inspections and defensible space enforcement.

Vice President

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We have been closely engaged in the development of Zone 0 policy for several years. In 2018, Marin’s fire agencies were the first in California to adopt local fire standards addressing the area immediately adjacent to structures, and the term “Zone 0” originated from Fire Safe Marin’s involvement in that work. This experience provides a direct, on-the-ground understanding of both the importance of this zone and the challenges associated with implementation.

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The April draft represents a meaningful step forward. Like the earlier drafts, it correctly identifies the first five feet around structures as the most critical area for reducing structure ignition and resulting community fire spread. This is consistent with post-fire investigations demonstrating the importance of wind-driven embers in home ignitions. Coupled with provisions in the building code, the near-home noncombustible zone will significantly reduce the number of direct ember ignitions. These provisions will also reduce the chance of indirect ember ignitions that result in radiant heat and direct flame contact with the home.

The draft regulation establishes several core provisions that we strongly support:

- A clear prohibition on combustible materials within Zone 0, including combustible mulch and stored wood
- Required vegetation-free buffer areas adjacent to walls, under eaves, and near windows, doors, and vents
- Restrictions on combustible attachments such as fences, including requirements to interrupt wood fencing where it meets a structure with a noncombustible section (for example, replacing the portion of fence attached to the home with a five-foot metal gate or panel)
- Maintenance requirements for trees that reduce ladder fuels and limit direct flame and ember pathways to the structure

These elements align with observed fire pathways in recent urban conflagrations, where ignition frequently occurs from ember accumulation and short-range flame contact at or immediately adjacent to the exterior wall.

We also support the inclusion of a phased implementation timeline. Providing up to five years for full compliance for existing structures, while requiring immediate compliance for new construction, is a practical approach that recognizes the scale of retrofitting needed across existing communities. The emphasis on education and assistance during this period is appropriate and will be necessary for successful adoption.

At the same time, we want to emphasize that the effectiveness of Zone 0 depends on clarity and consistency. The draft generally maintains this, but there are areas where implementation could drift if not carefully managed:

- The allowance of vegetation outside the immediate “safety zone” but within the five-foot area introduces variability that may be difficult to interpret and enforce consistently across jurisdictions.
- The provision for local alternative practices, while necessary, should be applied with clear guardrails to ensure that the “substantially similar practical effects” standard is upheld in practice, not just in intent.
- The success of this regulation will depend on avoiding gradual reintroduction of combustible materials into Zone 0 through interpretation, exemption, or inconsistent inspection practices.

From an implementation standpoint, the primary value of Zone 0 is that it is simple, observable, and directly tied to structure ignition, which makes it well-suited for consistent inspection and compliance. That clarity should be preserved.

Fire Safe Marin supports this regulation because it addresses the scale at which most structure loss occurs. In dense WUI communities, structure-to-structure fire spread becomes the dominant driver of loss once ignition begins. Reducing ignitions at the structure edge is one of the few interventions that can be applied consistently across entire neighborhoods and produce measurable reductions in loss.

We encourage the Board to move forward with adoption of a strong and clearly defined Zone 0 standard. The current draft provides a solid foundation. With careful attention to maintaining clarity and enforceability, it will materially improve structure survivability and community resilience in California’s fire-prone areas.

We appreciate the extensive outreach and engagement that has informed this draft and look forward to continued collaboration as the regulation is finalized and implemented.

Sincerely,



Todd Lando
President, Fire Safe Marin
Battalion Chief/Wildfire Mitigation Specialist, Central Marin Fire Department