



PUBLIC WORKS COMMISSION
CITY AND COUNTY OF SAN FRANCISCO

Daniel Lurie, Mayor

Correspondence Log

July 16 through September 3, 2026

Date Received	From	Subject
August 24, 2026	Denise Louie	Draft Cal Fire regulations regarding trees

Fuller, Bob (DPW)

From: Denise Louie <denise_louie_sf@yahoo.com>
Sent: Monday, August 24, 2026 2:48 PM
To: Lurie, Daniel (MYR); DPW-Public Works Commission; Short, Carla (DPW); Moore, David (DPW); Strong, Brian (ADM); Crispen, Dean (FIR)
Cc: Villarreal, Fernando (MYR); Chu, Carmen (ADM)
Subject: Draft Cal Fire regulations regarding trees

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Hi Mayor Lurie, Public Works Commission Chair Zoubi, Commissioners, Director Short, BUF Superintendent Moore, Fire Chief Crispen, and Climate Resilience and Capital Planning Director Strong,

As you may be aware, August 2026 draft regulations that apply to San Francisco's very high wildfire hazard severity zones require Zone 0 considerations. Zone 0 is the area around a building that poses the greatest danger for igniting the building. I urge PW to stop planting street trees that at maturity would encroach upon a building's Zone 0, to prioritize trimming existing trees that do encroach upon a building's Zone 0, and to follow Cal Fire guidelines to space existing trees and trees to be planted up to 30' apart, branch tip to branch tip, depending on slope.

Following are excerpts from the draft statewide regulations.

"§ 1298.04. Zone 0 Requirements. (a) Zone 0 is the area within five (5) feet around each Occupied Structure, beginning at the exterior surface of the exterior wall, roof, attached deck, stairs, or pergola and extending five (5) feet out, or to the property line, whichever comes first. For the purposes of compliance with Defensible Space requirements, the addition of any Occupied Structure, including an accessory dwelling unit as defined in Government Code section 66313, on a neighboring property shall not require a landowner to create additional defensible space on their own property and shall not result in that landowner being found to be out of compliance with defensible space regulations. (b) Zone 0 Requirements are as follows: (1) Except as set forth herein, **no Combustible materials are permitted within the full 5 feet of Zone 0**. This includes but is not limited to: fallen leaves and tree needles...." * [emphasis added]

Further, "[N]o new trees can be planted in Zone 0." and "Dead wood should be removed (immediately)." * (See p. 3)

While the regulations refer to very high wildfire hazard severity zones in Local Responsibility Areas like San Francisco, the principle is that trees in Zone 0 represent fire danger. And while the regulations are still in draft form, I strongly urge PW to adopt the principles immediately for the entire city.

Consider San Francisco's vulnerabilities. We are at risk of both wildfire and a post-quake conflagration. The CA Dept. of Forestry's 2007 map of SF showed many very high wildfire hazard severity zones around the city, mostly on the west side of the city. Most of the west side lacks the Emergency Firefighting Water System pipelines. A full buildout of the EFWS would cost at least \$3 b. The NWS issued unprecedented wildfire warnings for SF in 2024. There are 127 acres of unirrigated, highly flammable eucalyptus on the slopes of Mt. Davidson (our highest hill), Mt. Sutro

(where there were wildfires in 1899 and 1934) and Glen Canyon Park (where there are no fire hydrants for a mile along the O'Shaughnessy border), all of which put the entire city at risk of fire. Remember the 1906 post-quake conflagration, the 1991 Oakland and Berkeley Hills wildfires, and the 2025 LA County structure-to-structure firestorms.

For the sake of public safety, I urge PW to immediately stop planting street trees that at maturity would encroach upon a building's Zone 0, to prioritize trimming existing trees that do encroach upon a building's Zone 0, and to follow Cal Fire guidelines to space existing trees and trees to be planted up to 30' apart, branch tip to branch tip, depending on slope. Removing eucalyptus and dead wood from PW parcels would also help mitigate wildfire risk.

PW resources dedicated to planting street trees can be redirected to remove highly flammable vegetation, to train local native shrubs to tree standards, and to ensuring that the majority of planting focus on local native plants--in support of rapidly declining populations of native bees, butterflies and birds.

I look forward to your response. I'd be happy to discuss these issues with you further or to help craft a citywide regulation based on statewide regulations.

Respectfully,
Denise Louie

Advocate for fire prevention and preparedness and for native biodiversity in San Francisco

The California Native Plant Society, Yerba Buena Chapter (of SF) supports my advocacy regarding fire safety and biodiversity. The link is proper ecology!

* <https://34c031f8-c9fd-4018-8c5a-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/bof-website/board-meeting-information/monthly-board-binder-materials/archive/2026-monthly-board-binder-materials-workshop-archives/august-2026/full/full-8a-zone-0-regulation-summary--rule-plead-august-2026.pdf?rev=61084bcd20c94b9e9ece954da2c656f1&hash=6995E1441E12F3A819EE0167DD33306C>