

Your Community Impact Statement has been successfully submitted to City Council and Committees.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at NCsupport@lacity.org.

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The Board approved this CIS by a vote of: Yea(13) Nay(1) Abstain(1) Ineligible(0) Recusal(0)

Date of NC Board Action: 05/10/2021

Type of NC Board Action: Against

Impact Information

Date: 06/14/2021

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 19-0603

Agenda Date:

Item Number:

Summary: At a Brown Act Compliant Meeting on May 10, 2021, NoHo NC voted 13-1-1 to oppose any expansion of Fire District 1 and any ban on the use of timber in construction in high-density areas. Please see the attached statement for further details.



Community Impact Statement

[Council File: 19-0603](#)

City Building Code Fire District 1 Expansion / California Department of Forestry / Fire Protection Very High Fire Severity Zone / City High Wind Velocity Zone / Ordinance

The NoHo Neighborhood Council strongly opposes Council File 19-0603 and any expansion of Fire District 1. We recommend that the City of Los Angeles vote against this measure. While the NoHo Neighborhood Council applauds careful and well thought out fire safety measures, the density rules in this measure would affect the entirety of NoHo and make it much more expensive to build in and invest in NoHo with little to no additional safety benefit for our community that reflects our real risk from wildfire.

The Blumenfield-Rodriguez measure seeks to expand the [Fire District 1](#) designation to many areas of the city. The Fire District 1 designation was first created over 100 years ago to address issues of insurability in buildings constructed before the advent of modern construction techniques and sprinkler systems. Simply put, a Fire District 1 designation severely restricts the type of construction, building materials, and lot setbacks that can be applied to properties within those zones. Part of the proposed ordinance uses density as a proxy for wildfire risk, and would give any neighborhood with a density above 5000 people per square mile the Fire District 1 designation.

Far too often density is simply another measure for the economic means of a neighborhood. This measure is far too simplistic in how it relies on population density as a marker for wildfire risk, despite NoHo and other similarly dense communities having no woodlands. While Councilmembers have discounted the amount of land that would be affected, it is worth noting that NoHo has a population density well above 5000 people per square mile. How does our wildfire risk significantly differ from that of our neighboring communities in the city which would not be affected by these restrictions due to their lower density? These new building codes would not significantly help our community mitigate wildfire risk, but it would have the effect of making construction in our communities more expensive and less ecologically friendly.

The irony is that this policy, when enacted in communities that do not have woodlands, would help contribute to future wildfires by forcing building construction to be more CO2 intensive in their use of building materials rather than less. The change in acceptable building materials does not align with the statewide California Building Code, which is both frequently updated and seen as the benchmark for California building standards. The use of concrete is the source of about 8% of the world's CO2 emissions, whereas responsibly farmed timber is a carbon sink. If the concern is reducing our risk of wildfire, then the City should be looking at

ways to encourage construction that involves less CO2 emissions, not mandating construction that is more CO2 intensive.

In addition, it is widely believed that the use of a new innovative construction material called [mass timber](#) will be added to the building code statewide. Mass timber has already demonstrated [extreme fire resistance](#) and [earthquake resistance](#). This is nothing more than a cynical attempt by the concrete industry to prevent the proliferation of mass timber through the use of regulatory capture. Lobbying groups representing the concrete industry do not care about the future of affordable units in NoHo or Los Angeles as a whole; they care about protecting their profits first and foremost. NoHo and other similarly dense communities should not have to pay for their profits through disinvestment in our communities and increased housing prices. The construction of new commercial and multifamily housing would be significantly harmed by this measure through increased costs, and the resulting displacement and increase in sprawl will increase fire risk for Los Angeles and the cities on our Urban Wildland Interface.

In order to be a vibrant and thriving community, we must expand our access to affordable housing built around mass transit. This motion does not focus on the real safety risk of fires in parts of the city exposed to wildfires. It would ban type IV (heavy timber) and V (wood-frame) construction of larger projects in areas with 5,000 or more residents per square mile - which includes a large majority of the city, including many of Los Angeles' most walkable and transit-rich communities, where we should be encouraging new housing. It would directly conflict with the setback allowances [Transit Oriented Communities](#) are given by Measure JJJ when building new affordable units and would disincentivize builders from offering affordable units. New type IV and type V structures, including multi-family residential buildings, are fire-safe under current building codes. They are also less costly to build than type I, II, and III structures. The cost to build new homes in Los Angeles is already too high, which has reduced the amount of permanent supportive, affordable, and market-rate housing constructed in recent years and contributed to a severe increase in homelessness and housing costs.

The recent [report back](#) from the Department of Building and Safety reiterates that building costs would increase 10.6% to 47.1%. It also concluded that an expansion of Fire District 1 would likely reduce the financial feasibility of affordable housing projects and may result in fewer affordable housing units in the City.

The NoHo Neighborhood Council urges the City Council **to vote no** on this measure.