

Communication from Public

Name: Jillian Hegedus
Date Submitted: 03/01/2021 04:26 PM
Council File No: 19-0603
Comments for Public Posting: Build With Strength Los Angeles, in support of Building A Safer Los Angeles, submits to the Los Angeles Council a rebuttal letter to Abundant Housing's opposing letter.



February 25, 2021
Los Angeles City Council
200 North Spring Street
Los Angeles, CA 90012

CF 19-0603 - City Building Code Fire District 1 Expansion - SUPPORT

Dear Councilmembers,

Build with Strength, a coalition consisting of local community-based organizations, fire safety professionals, engineers, architects and industry experts is committed to strengthening the nation's building codes and ensuring greater access to secure housing.

The Los Angeles coalition is proud to support the "Building A Safer Los Angeles" motion that currently sits before the Los Angeles City Council, sponsored by City Councilmembers Bob Blumenfield and Monica Rodriguez. We respectfully urge you to reject the recent baseless claims outlined in a letter published by LA Abundant Housing. The claims that the language is overly restrictive, will negatively impact the housing crisis, cost more, and will have an adverse effect on climate change are simply incorrect and provide no data as evidence for these claims.

Below are rebuttals to those claims and the reasons why the Los Angeles City Council should move forward in support of this motion as soon as possible.

Claim: Overly Restrictive of Building Materials

The proposed ordinance language does not restrict wood-frame construction. The ordinance adopts an already existing zoning overlay called Fire District No 1. Type III construction allows for fire treated wood-frame construction and is unrestricted in the Fire District No 1 overlay.

Fire Retardant Treated Wood (FRTW) matches the definition of "noncombustible" requirements in the International Building Code. Pressure impregnated fire retardant treatments do not prevent wood from being destroyed by fire, but when added to wood, provide passive protection and slow down the decomposition during actual fire conditions. The exterior walls of Type III are required to be of either noncombustible materials or fire-retardant-treated wood (FRTW) while other building elements are allowed to be combustible.

Moreover, the expansion of Fire District No. 1 does not apply to all of the city of Los Angeles. Only areas of high fire, high wind and dense population where people are more at risk as outlined in the motion.

Claim: Negative Impact on Housing Crisis

The devastating 2018 Woolsey Fire that burned more than 96,000 acres in Los Angeles and Ventura Counties killed at least 3 people and destroyed more than 1,600 buildings and other structures. Which is worse - having unsafe housing that burns down (and rebuilt by taxpayers) or resilient housing which will last the test of time?

Housing should not only be affordable but designed and operated to keep residents safe and healthy for the long term. The City's mandate to encourage new housing for its growing population must also encourage housing that is safe by anticipating the impact of potential hazards and the fire risk we are experiencing year after year.

We should not sacrifice safety in any situation and the availability of resources is not an issue that would negatively impact our current housing crisis.

Claim: Increase in Housing Cost

According to all [reports](#), wood prices are at an all-time high. As such, using abundant, affordable materials is something the city should welcome – particularly given the added benefits of safety, resilience, and sustainability.

Moreover, the proponents of a new untested material outlined in the letter neglected to mention that mass timber is the most expensive form of construction. Just one example is the Portland, OR Frameworks "affordable" housing project that was cancelled due to a financial shortfall even with a \$1.5 million grant from the USDA. The building, which was slated to include 60 affordable apartments, was projected to cost \$651.43 per square foot! More on that project can be found [here](#).

The bottom line is that the requirements in the motion will not have a dramatic impact on cost and in fact it is cheaper today to build with non-combustible materials.

Claim: Non-combustible materials will have a negative impact on climate change

Structural fires are actually major contributors to greenhouse gas emissions, something that this motion will help prevent. On average, the total material burned in a structure fire is 1.15 tons (CARB). During the 2015-20 five-year period, US fire departments responded to an estimated average of 353,100 home structure fires per year. These fires caused an annual average of 2,620 civilian deaths; 11,030 civilian fire injuries; and \$7.2 billion in direct property damage. Again, the proposed ordinance language does not restrict wood-frame construction. The ordinance adopts an already existing zoning overlay called Fire District No 1. Type III construction which allows for fire-treated wood is unrestricted in the Fire District No 1 overlay.

The primary basis of the claims outlined in the letter are that trees sequester carbon and thus do not contribute to greenhouse gas emissions the way steel and cement production do. This is true, at least to the extent that the trees stay in the ground doing their work providing habitat, stabilizing soils, sequestering carbon, and providing us with oxygen and breathtaking landscapes. Once the trees are harvested of course those benefits end.

Industrial logging such as clearcutting practices transfers most of the carbon in the forest to the atmosphere as logging slash, mill waste, and processing emissions. Only 15-33% of carbon is actually sequestered in the wood product itself, the rest is emitted as greenhouse gas emissions. See reference reports [here](#) and [here](#).

The fact is, all material industries have fully invested to the fight against climate change. The concrete industry as the leader in material transparency have reduced their CO2 footprint by 13% in the last 5 years. Energy efficiency improvements spurred significant reduction in recent years for the steel industry. Among other commitments, both industries are aggressively adopting rigorous environmental management systems to meet and exceed environmental regulations, using energy-efficient plant equipment and delivery vehicles, and increasing the use of recycled materials and using renewable energy.

We are fully supportive of Councilmembers Blumenfield and Rodriguez in their pursuit to improve mid-rise construction practices, including for those in need of housing across our city. This motion will make future housing safer, more resilient, and sustainable and will not negatively impact cost to do so.

Sincerely,

Build with Strength Los Angeles

THE ROW CHURCH



TARZANA
NEIGHBORHOOD
COUNCIL
TARZANANC.ORG



Los Angeles
Urban League



CALIFORNIA
BLACK
CHAMBER OF COMMERCE



NaLEC
National Latino Evangelical Coalition

