

## Communication from Public

**Name:** Southern California Association of Nonprofit Housing

**Date Submitted:** 06/16/2021 12:42 PM

**Council File No:** 19-0603

**Comments for Public Posting:** Dear members of the Planning and Land Use Mgmt. Committee: SCANPH is a nonprofit membership association representing dozens of affordable housing developers throughout the City of Los Angeles and the greater Southern California region. Our members develop permanent, high quality, below market rate homes for low and extremely low income residents. Our organization wishes to voice respectful opposition to Councilmember Blumenfield's motion to explore the expansion of Fire District 1, which the committee will be considering in the coming weeks. The report submitted to the committee from the Fire Department (LAFD) and Department of Building and Safety (LADBS) details the harm the expansion of Fire District 1 would have on affordable housing production. Cost analyses from LADBS data show that buildings constructed in Type I, II, and III (the only permitted in Fire District 1) cost 15-47% more than those constructed in Type IV and V. A survey of 84 properties funded by HCIDLA showed that the majority were constructed in the buildings types disallowed by Fire District 1. The report also argues that because of these limitations "there are very few HCIDLA-financed projects located in Fire District 1 areas" and that an expansion of the district would "likely reduce the financial feasibility of affordable housing projects." SCANPH corroborated this information by polling its own members, the majority of which rely heavily on Type IV and Type V construction to produce the affordable housing our city so desperately needs. The report also argues that the California Building Code, along with Los Angeles' own fire code, provide ample protection for our City's residents as is. When clad in fire retardant material such as stucco, wood framing used in Type IV is a safe building material. Additionally, mass timber is also a new building material which offers an efficient and sustainable building approach for developers of affordable housing. These developers rely on these buildings methods throughout the City outside of Fire District 1 without trouble. It is also important to note that out of ten other jurisdictions surveyed in the report (including San Diego, San Francisco, and cities in Los Angeles and Orange Counties) none used fire districts in addition to the state building code. This demonstrates that this district is an outdated tool for fire control, and an expansion of its boundaries is not a viable approach for

increasing safety in the City of Los Angeles. To be clear, SCANPH does not stand against public safety and is thankful that the City is interested in responding to our area's increasingly deadly wildfire seasons. However, we believe that the report submitted to the Committee clearly demonstrates that the expansion of Fire District 1 is not the best way to keep Angelinos safe. This expansion will limit access to land and increase building costs for the builders of affordable housing in our region. SCANPH implores the committee members to send a "no" recommendation to Council regarding this motion, and explore other options for increasing fire safety in our city without exacerbating our housing crisis. We thank you for the work you do to help abate our housing crisis. Sincerely, Francisco Martinez  
Policy Director Southern California Association of NonProfit Housing (SCANPH)

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June 16, 2021

Los Angeles City Council  
Planning and Land Use Management Committee  
200 N Spring Street  
Los Angeles, CA 90012

**Re: Expansion of Fire District 1, Council File 19-0603**

Dear members of the Planning and Land Use Mgmt. Committee:

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A survey of 84 properties funded by HCIDLA showed that the majority were constructed in the buildings types disallowed by Fire District 1. The report also argues that because of these limitations "there are very few HCIDLA-financed projects located in Fire District 1 areas" and that an expansion of the district would "likely reduce the financial feasibility of affordable housing projects." SCANPH corroborated this information by polling its own members, the majority of which rely heavily on Type IV and Type V construction to produce the affordable housing our city so desperately needs.

The report also argues that the California Building Code, along with Los Angeles' own fire code, provide ample protection for our City's residents as is. When clad in fire retardant material such as stucco, wood framing used in Type IV is a safe building material. Additionally, mass timber is also a new building material which offers an efficient and sustainable building approach for developers of affordable housing. These developers rely on these buildings methods throughout the City outside of Fire District 1 without trouble.

It is also important to note that out of ten other jurisdictions surveyed in the report (including San Diego, San Francisco, and cities in Los Angeles and Orange Counties) none used fire districts in addition to the state building code. This demonstrates that this district is an outdated tool for fire control, and an expansion of its boundaries is not a viable approach for increasing safety in the City of Los Angeles.

To be clear, SCANPH does not stand against public safety and is thankful that the City is interested in responding to our area's increasingly deadly wildfire seasons. However, we believe that the report submitted to the Committee clearly demonstrates that the expansion of Fire District 1 is not the best way to keep Angelinos safe.

This expansion will limit access to land and increase building costs for the builders of affordable housing in our region. SCANPH implores the committee members to send a "no" recommendation to Council regarding this motion, and explore other options for increasing fire safety in our city without exacerbating our housing crisis.

We thank you for the work you do to help abate our housing crisis.

Sincerely,

A handwritten signature in cursive script that reads "Francisco Martinez".

Francisco Martinez

Policy Director

Southern California Association of NonProfit Housing (SCANPH)