

Communication from Public

Name: Pro-Housing Coalition

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Council File No: 19-0603

Comments for Public Posting: The Southern California Association of NonProfit Housing, in collaboration with several organizations representing the building industry, pro-housing advocates, and business interests of Los Angeles, respectfully submits this letter of opposition to the motion from Councilmember Bob Blumenfield's office to expand Fire District 1. As the attached letter details, the motion proposes to utilize an obsolete tool which will harm the production of affordable housing and contradicts existing City sustainability policies, all while providing virtually no increase in fire/life safety for our City's residents. We implore your offices to heed our coalition's position as well as that of several neighborhood councils which have already submitted opposing Community Impact Statements on this issue. We sincerely believe this motion will cause unnecessary stress on the affordable housing industry and hope for your "no" vote. Sincerely, Francisco Martinez Policy Director Southern California Association of NonProfit Housing (SCANPH) Carlo Caccavale Executive Director American Institute of Architects, Los Angeles Diana Victoria Coronado Vice President Building Industry Association of Southern California Ben Stapleton Executive Director U.S. Green Building Council, Los Angeles Jessica Lall President and CEO Central City Association of Los Angeles Mary Leslie President Los Angeles Business Council Leonora Camner Executive Director Abundant Housing LA



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July 29, 2021

Los Angeles City Council
Planning and Land Use Management Committee
200 N. Spring Street
Los Angeles, CA 9012

Re: Expansion of Fire District 1, Council File 19-0603 (Blumenfield)

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

The Southern California Association of NonProfit Housing, in collaboration with several organizations representing the building industry, pro-housing advocates, and business interests of Los Angeles, respectfully submits this letter of opposition to the motion from Councilmember Bob Blumenfield’s office to expand Fire District 1. The motion proposes to utilize an obsolete tool which will harm the production of affordable housing and contradicts existing City sustainability policies, all while providing virtually no increase in fire/life safety for our City’s residents.

The Motion Would Harm Housing Production

Between 2014 and 2021, our city missed its affordable housing production goals by five-figure shortfalls for very low, low-, and moderate-income brackets. Going forward, our production goals will be much higher: the 2021-2029 Regional Housing Needs Assessment [demands a four-fold increase](#) in all housing production from Los Angeles over the next seven years. Meanwhile, the effects of our shortcomings become more palpable daily, with an average of four unhoused people dying on the streets of Los Angeles County every day.

In the midst of this crisis, the expansion of Fire District 1 would have a cooling effect on market-rate and affordable housing production. LADBS’ own report back to City Council on this issue

argued that the expansion of Fire District 1 would increase construction costs by 15-47%. Moreover, a survey of 84 properties funded by HCIDLA reveals that the majority were constructed in the building types disallowed by Fire District 1. The report also argues that because of these limitations, an expansion of the district would “likely reduce the financial feasibility of affordable housing projects.”

Proponents in favor of expanding Fire District 1 point out that the current proposal would impact only 4% of the City’s land area, but this ignores the fact that these areas of the City are responsible for a disproportionate share of housing production. With three quarters of the city being zoned for single-family residences, these regions are some of the few areas where developers can construct the dense, multi-family housing we need. This means that the proposed expansion would have a far greater effect on the multi-family housing industry than the 4% figure indicates.

Fire District 1’s restrictions also preclude mass timber buildings in dense, mid- and high-rise urban areas where they are most appropriately located, which is harmful for new housing production. For example, the District’s requirements have placed an award-winning, 100% rent-restricted, 14-story mass timber building on Skid Row on hold.¹ At a time of great humanitarian crisis in our city around the issue of homelessness, this antiquated tool is preventing unhoused residents from accessing 150 units of permanent supportive housing, simply because its structure is built in mass timber. The District’s requirements hold our City back from this innovative and sustainable new construction type that uses renewable materials and sequesters carbon.² Rather than embrace this new building approach and the new units it promises, this motion would further expand the restrictions which are actively preventing the construction of this housing.

Hard data from the City’s own departments show that this motion will increase costs and restrict the flexibility developers need to create housing on each unique site. The measure would also push the construction of affordable housing away from the expanded District area, exacerbating the already inequitable distribution of subsidized housing in our City. In short, imposing further restrictions on the construction of housing during an urgent crisis is a waste of political energy which will have significant negative effects on local affordable housing builders.

The Motion Contradicts Los Angeles’ Sustainability Goals

Aside from increasing costs, the expansion of Fire District 1 would force builders to rely on more environmentally exhaustive materials. Together, [concrete](#) and [steel](#) production account for 16% of the world’s CO2 emissions, while farmed timber is typically carbon negative.

Increasing the land area in which the City mandates concrete and steel construction goes directly against Los Angeles’ sustainability goals. In particular, any future ordinance on this issue would run counter to the City’s membership in the [C40 Cities Climate Leadership Group](#), an organization that Mayor Garcetti chaired in 2019. Moreover, because the District’s expansion would increase building costs and effectively create a disincentive to build in its area, this motion could negate hard-won programs which dovetail with the City’s sustainability goals, such as the Transit Oriented Communities Incentive Program.

¹ <https://urbanize.city/la/post/skid-row-housing-trust-plans-mass-timber-high-rise-dtla>

² https://www.ccala.org/clientuploads/directory/whitepapers/CCA_Mass_Timber_White_Paper_final.pdf

The Motion will not Improve Fire/Life Safety

Initially created to increase safety from wildfires, this motion would unnecessarily expand Fire District 1 into densely developed areas with low wildfire risk. The proposed expansion of this obsolete tool undermines the existing state building code and establishes a dangerous precedent of politicizing fire safety. Fire districts are an outdated approach to building safety used in no other major city in California, according to the report from LADBS and LAFD. Rather than rely on such an antiquated tool, this coalition recommends that the City place its faith in building experts and established, trusted processes for updating the building code, rather than piecemeal changes.

Alternatives for Producing Housing More Effectively

In summary, this motion would restrict the production of housing at great detriment to the environment, and leave fire safety in Los Angeles unchanged. This coalition would be grateful for the opportunity to engage with officials about how to increase safety for all Angelenos, particularly in existing building stock in need of updates. However, we believe that the brunt of our political capital should be expended toward solving our most pressing crises: housing and homelessness.

With this in mind, we recommend shifting the City Council's energy toward breaking barriers in affordable housing production and the building industry generally. This can be done by raising the unit threshold for Site Plan Review, allowing Type IV mass timber construction in Fire District 1, and eliminating red tape within the City's bureaucracy through Delegated Authority and the creation of an Affordable Housing Division. A summary of these proposals is [located here](#).

We implore your offices to heed our coalition's position as well as that of several neighborhood councils which have already submitted opposing Community Impact Statements on this issue. We sincerely believe this motion will cause unnecessary stress on the affordable housing industry and hope for your "no" vote.

Sincerely,

Francisco Martinez

Policy Director

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