

## Communication from Public

**Name:** Holmes

**Date Submitted:** 08/27/2021 04:54 PM

**Council File No:** 19-0603

**Comments for Public Posting:** IN OPPOSITION: Holmes opposes the City of Los Angeles Council File 19-0603, which proposes to expand Fire District 1 (FD1). By limiting heavy timber (Type IV) and wood-framed (Type V) construction, the measure would put Los Angeles out of touch with state and international building codes, reverse sustainability strides in the City, and exacerbate its affordable housing crisis. Holmes recommends the City vote “no” on this motion. As structural engineers and fire engineers, our designs influence the built world, not only in aesthetics and function but with a large impact on sustainability, safety and resiliency. Please see attached our letter in OPPOSITION.

August 27, 2021

Honorable Members of the Planning, Land Use, & Management Committee  
c/o Office of the City Clerk  
City Hall, Room 395  
Los Angeles, California 90012

**RE: CF 19-0603 / City Building Code Fire District 1 Expansion**

**Dear Honorable Members,**

Holmes opposes the City of Los Angeles Council File 19-0603, which proposes to expand Fire District 1 (FD1). By limiting heavy timber (Type IV) and wood-framed (Type V) construction, the measure would put Los Angeles out of touch with state and international building codes, reverse sustainability strides in the City, and exacerbate its affordable housing crisis. Holmes recommends the City vote “no” on this motion.

**Overlooking Current Code**

Council File 19-0603 does not recognize existing fire and life safety code requirements to heavy timber (e.g., mass timber). Current code protects Construction Types IV and V from uncontrolled fire by imposing limitations commensurate with the risks and exposure of each building type. For example, Type IV-HT (heavy timber) construction requires non-combustible exterior walls under current code. The limitations that an expanded FD1 would pose do not account for established safety measures that already safeguard these buildings. Curiously, Council File 19-0603 does not include further code restrictions to Type III construction, which has similar risks to Types IV and V construction. This omission points to larger contradictory issues within the measure.

Furthermore, concerns about the fire life-safety and viability of heavy timber have been continuously addressed and refuted by decades of research around the world. Heavy timber has proven to have reliable material properties, is recognized as an approved lateral system for earthquake loads, and has well-established performance in fire scenarios. This has led the California Building Standards Commission (CBSC), International Code Council (ICC), and Office of the State Fire Marshal (OSFM) to approve its usage throughout the state, including in Wildland Urban Interface (WUI) zones. Restricting its usage in the proposed FD1 expansion contradicts years of research, successful applications, and the discernment of the above regulatory entities.

**A Lapse in Progress**

Passing this measure would completely misalign the City of Los Angeles with state and national public policy. Chief among heavy timber’s many benefits is its ability to reduce the embodied CO<sub>2</sub> footprint of a building relative to more conventional building materials. Both Governors Jerry Brown and Gavin Newsom are proponents of heavy timber and have hailed the material as a viable, fire-resistant solution to help offset

California's carbon footprint. The Biden-Harris Administration has also indicated a desire to subsidize the material, thereby turning it into a cost-neutral tool that can reduce greenhouse gas emissions from new construction. In 2018, then-Governor Brown issued Executive Order B-52-18, which committed the state to supporting innovation in wood products to augment sustainable forestry practices. In April 2021, Los Angeles Mayor Eric Garcetti signed the international C40 Cities agreement, which holds Los Angeles accountable for meeting ambitious environmental goals. Council File 19-0603 directly contradicts these important initiatives and undermines the City's commitment to environmental protection by limiting the usage of a crucial and advantageous construction resource.

### **Hindering Affordable Housing Production**

An expansion of Fire District 1 could severely stall Los Angeles's affordable housing production. Amid the City's unprecedented housing crisis, Holmes recognizes the link between affordable building materials and affordable housing production. Heavy timber's prefabricated nature drastically accelerates construction schedules, reduces on-site labor, and minimizes material waste, thereby reducing the overall cost of construction. In addition, the Los Angeles Department of Building Safety (LADBS) warned the City Council in May 2021 that an expansion of Fire District 1 would increase construction costs by 15-47%. Moreover, a survey of 84 properties funded by the Housing and Community Investment Department of Los Angeles (HCIDLA) reveals that the majority of their affordable housing projects were constructed in the building types prohibited by Fire District 1. Limiting these construction types will impede upon the City's ability to produce affordable housing at the rate necessary to accommodate demands.

In summation, Holmes urges the City of Los Angeles to vote "no" on Council File 19-0603. If members of the City Council, elected or staff, seek additional information or technical clarifications, we are available to answer any questions. Holmes appreciates your attention to this matter. Thank you.

Sincerely,



Nina Mahjoub, PE, LEED AP  
PRINCIPAL  
HOLMES STRUCTURES



Bevan Jones, PE  
PRINCIPAL & CEO  
HOLMES FIRE



Katy Faix, AIA  
PRINCIPAL  
HOLMES US