

## Communication from Public

**Name:** Jerome R  
**Date Submitted:** 11/20/2021 09:14 PM  
**Council File No:** 19-0603  
**Comments for Public Posting:** Another attempt at making the building of housing in LA exorbanantly expensive? What the hell is wrong with you all?

## Communication from Public

**Name:** Timothy OConnor  
**Date Submitted:** 11/19/2021 02:52 PM  
**Council File No:** 19-0603  
**Comments for Public Posting:** Please see attached letter from EDF.



Finding the ways that work

November 17, 2021

Councilmember Bob Blumenfield  
Los Angeles City Hall  
200 N. Spring Street #465  
Los Angeles, CA 90012

**Subject: Motion CF# 19-0603**

Dear Councilmember Blumenfield,

***We are writing in response to CF# 19-0603 to express concerns over the potential unintended environmental consequences that run contrary to the City's response to Climate Change. We urge you to pursue alternatives.***

Environmental Defense Fund is an environmental Not-for-profit Organization with over 70,000 members in California, over 14,000 of whom live in Los Angeles area. For years we have worked toward reducing emissions of greenhouse gases (GHG) that destabilize the climate, including as a participant in working groups related to the development of LA's Sustainability pLAN, and in efforts at the county, state and national level.

It is in pursuit of this objective that we write about concern over your motion, CF# 19-0603, that could prevent use of certain wood framed building materials in most of downtown and in many height districts throughout the City. The alternative to wood material use, building materials such as steel and concrete, would result in increased environmental impact from construction with little proven safety benefit. As a result, we are concerned that the motion is contrary to the strong environmental commitments and policies of the City and County of Los Angeles, including the Sustainability pLAN, the Green New Deal and carbon reduction goals.

**Our primary concern, on behalf of our own informed interest and that of our members living in the City of Los Angeles, is that passage and implementation of CF# 19-0603 could undermine progress on climate when it is needed most, and with little to no benefit.**

As documented by the World Green Building Council, buildings are currently responsible for 39% of global energy related carbon emissions: 28% from operational emissions, from energy needed to heat, cool and power them, and the remaining 11% from materials and construction. Accordingly, nearly 30% of the GHG emissions associated with the building sector are attributable to so-called embodied carbon – the emissions associated with the manufacturing, delivery and assembly of building materials including steel, concrete, and wood. Wood, due to its role in carbon dioxide uptake and sequestration in the growing process is generally considered the least carbon intensive of the commercially available building

materials. As a result, use of managed harvesting of timber for use in construction, especially when that timber is cultivated using certified sustainable sources and put into reuse or recycling programs when no longer needed can serve a critical strategy for overall decarbonization efforts.

Based on observations of the benefit of wood construction as compared to other materials from a climate standpoint, it reasons that the prohibition of wood construction would have the practical effect of increasing the embodied emissions associated with construction in the city, thereby increasing the overall greenhouse gas footprint of the local building industry.

While this letter focuses on the climate impacts of a change in the use of timber in local construction, we of course recognize that there may be instances when competing priorities necessitate practices that may otherwise result in increases in GHGs. However, in this instance, the California State Board of Forestry and Fire Protection has called for an [increase in markets for innovative wood products](#), in part to help reduce fire risk in California's forests and enhance the public safety of all Californians. Further, in 2020 the California Building Standards Commission unanimously approved the use of wood in buildings ranging from nine to 18 stories tall – standards which went into effect in July 2021 and which reflect the overall safety of the practice.

In furtherance of the observations above, we urge your office and the broader City Council to revisit and rescind the current proposal and instead more deeply explore the combined public safety, climate and environmental benefits associated with emerging wood construction materials. If fire safety is the true motivation behind the motion, we support and encourage the city to reevaluate the findings of the report from Department of Building and Safety, the Fire Department and the Department of City Planning that say the City's Fire Code imposes more restrictive requirements for buildings and structures within the City of Los Angeles than the State – to determine whether other changes are warranted.

Please feel free to contact us if you have any questions or would like to discuss this further.

Sincerely,

Eric Holst  
Associate Vice President, Working Lands  
Environmental Defense Fund

Tim O'Connor  
Senior Director, Energy Decarbonization Strategy  
Environmental Defense Fund