

Communication from Public

Name: Dennis Richardson
Date Submitted: 12/02/2019 03:31 PM
Council File No: 19-0603
Comments for Public Posting: Please letter dated December 2, 2019 and attachment dated May 22, 2018



AMERICAN WOOD COUNCIL

December 2, 2019

Honorable City Council
201 North Spring Street
Los Angeles, CA 90012

Attention: Planning and Land Use Management Committee

**RE: Motion (Blumenfield—Rodriguez) Relative to “Building a Safer Los Angeles”
a motion to expand the area of Fire District 1**

This letter is in response to the motion by Council Members Bob Blumenfield and Monica Rodriguez attempting to improve wildfire safety of multi-family residential construction by extending Fire District 1 practically Citywide.

The consequences of this motion would be no improvement of fire safety from Santa Ana wind driven fires with the embers and exposure they generate. The primary outcome of this ordinance would be both to limit material options of new environmentally preferred construction types and raise construction costs for most housing throughout the City of Los Angeles.

The American Wood Council (AWC) is the voice of the North American wood products manufacturing industry, providing information on wood design and regulations. AWC staff experts develop state-of-the-art engineering data, technology, and standards for wood products to assure their safe and efficient design. We are the developers and publishers of both the National Design Specification® (NDS®) and the Special Design Provisions for Wind and Seismic (SDPWS) that are adopted by reference and form the basis for wood structural design in both the International Building Code and the California Building Code.

In 2017 and 2018, AWC responded to a similar motion by Council Member Bob Blumenfield proposing to revise the LA Building Code to address a concern after the DaVinci fire over the potential for construction fires of large multi-family projects. A copy of our letter addressing that motion is attached. We applaud the LA Fire Department working to improve the enforcement of construction fire related regulations as was suggested instead of an ordinance restricting construction types.

Over the past several years the American Wood Council has participated with the International Code Council code process to develop three new types of mass timber construction that have a substantially greater fire resistance when compared to current wood construction recognized by the California Building Code. These three new types of construction (Type IVA, IVB and IVC) also have a fire resistance rating equal to or greater than the fire resistance rating of noncombustible buildings approved in Fire District 1 and Types IVA and IVB construction have been shown by full scale testing at the US Government Alcohol, Tobacco and Firearms test facility to burn themselves out

with multifamily residential configurations and fire loading when the sprinkler systems are turned off and there is no fire fighter intervention.

These three new types of construction were approved for inclusion in the 2021 International Building Code because of their fire performance and will allow multi-family mass timber residential construction from 9 stories up to 18 stories in height. Because these new types of mass timber constructions offer considerable improvement both to the environment and forest health, former Governor Brown issued executive order B-52-18 item 13 which requests the State Fire Marshal consider early adoption.

That process has begun with several stakeholder meetings and was recommended in a package of proposed state amendments published by the State Fire Marshal office to be considered by the California Building Standards Commission in December of 2020 for statewide adoption in July of 2021 after additional public comment and stakeholder input at the CA Building Standards Commission and Code Advisory Committee meetings.

In California, the State Fire Marshal regulates construction in Wildland Urban Interface (WUI) or Very High Fire Severity Zone (VHFSZ) areas. AWC supports recent legislation and efforts by the State Fire Marshal to make those regulations more effective and the City of LA Motion (Bonin-Koretz- O'Farrell-Ryu) to be more prepared with a WUI taskforce.

Expanding Fire District 1 in LA does nothing to address wildfire concerns and it will prohibit new innovative Type IV construction types citywide.

We request you consider modifying the Fire District 1 ordinance to include the new types of construction once they are approved to be adopted at a State level. These new types of construction have been vetted and approved through the International Code Council code development process and are in effect in Oregon and Washington State.

We hope this information is helpful and look forward to working with the LA Building and Safety and/or Fire Department staff if there is any desire to consider code changes before they are adopted by the State of California.

Sincerely,



Dennis Richardson PE, CBO, CASp
West Coast Regional Manager

Attachment: May 22, 2018 AWC Letter

Communication from Public

Name: Dennis Richardson
Date Submitted: 12/02/2019 03:34 PM
Council File No: 19-0603
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AMERICAN WOOD COUNCIL

May 22, 2018

Honorable City Council
201 North Spring Street
Los Angeles, CA 90012

Attention: Sharon Dickinson, Legislative Assistant, Planning and Land Use Management Committee

RE: PLUM Presentation Relative to DaVinci Apartment Complex Fire- Council File 16-1165

This letter is to transmit testimony regarding the May 22, 2018 PLUM meeting, item 6, a report by the Building and Safety Division regarding policy questions after the Da Vinci construction fire that occurred on December 7, 2014.

The American Wood Council (AWC) is the voice of the North American wood products manufacturing industry, providing information on wood design and regulations. AWC staff experts develop state-of-the-art engineering data, technology, and standards for wood products to assure their safe and efficient design. We are the developers and publishers of both the National Design Specification[®] (NDS[®]) and the Special Design Provisions for Wind and Seismic (SDPWS) that are adopted by reference and form the basis for wood structural design in both the International Building Code and the California Building Code.

This letter is in addition to our letter and testimony at the PLUM committee dated January 9, 2017.

American Wood Council participates in the code development process and is closely monitoring and participating in the International Code Council improvement of Construction Fire Safety related codes.

Summarizing the January 9, 2017, letter there were four code changes that have been incorporated into the 2018 IBC and IFC that we suggested the City of LA should consider adopting and enforcing early.

Since that time, there have been three additional construction fire safety code changes worthy of consideration for early adoption and enforcement that received initial committee approval for the 2021 IBC and IFC. These are:

- F263-18 - updates and strengthens the previously mentioned construction fire safety provisions regarding hot work and fire watch,

- F264-18 - further strengthens fire watch, site safety plan requirements and processing, and establishes a Site Safety Director position and responsibility,
- F268-18 – clarifies the requirement for fire flow at construction sites.

We believe all of these code changes offer an opportunity to improve the safety of construction sites in LA whether containing combustible material or not.

AWC wants to further bring your attention to State of California Executive Order B-52-18 recently issued by Governor Brown that directs the Office of the State Fire Marshal, Department of Housing and Community Development, The Division of State Architect, the California Building Standards Commission, and the Office of Statewide Health Planning and Development to review 14 recently approved Tall Wood Code Change proposals for the 2021 IBC and consider early adoption during the upcoming intervening code cycle. We believe these regulations offer great promise for increased fire safety while architects and the public push for taller housing development projects. An LA ordinance recently proposed for LA by steel and concrete proponents would prohibit such combustible materials even though they offer superior construction.

Finally with respect to that competing industry proposed ordinance, we suggest the Citizens of LA deserve a more thorough and deliberate process for education. The proposed ordinance, though not a part of this hearing, would potentially have the following effects for the Citizens of LA:

1. Reduce construction site safety.
2. Allow for some finished buildings to be less energy efficient.
3. More directly increase housing construction costs as energy costs increase.
4. Potentially decrease the seismic and fire performance of depending on building system.
5. Limit or preclude the opportunity to benefit in LA from technology advances touted in the Governor's Executive Order.

We look forward to the opportunity to closely work with City Council and Staff to educate and assist with work needed to advance and educate so that informed policy decisions can be made that benefit the Citizens of LA rather than narrow special interest groups. We feel it is important that potential solutions are vetted and approved through a public process rather than as drafted and pushed by special interests.

Sincerely,



Dennis Richardson PE, CBO, CASp
West Coast Regional Manager