



## AMERICAN WOOD COUNCIL

March 3, 2021

Los Angeles City Council  
200 North Main Street  
Los Angeles, CA 90012

RE: OPPOSE Council File #19-0603 (Blumenfield)

The American Wood Council joins the coalition of builders, affordable housing developers, environmental groups and wood product manufacturers who respectfully opposes [Council File #19-0603](#).

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.

While the "Building A Safer Los Angeles" motion may be well intended, the impact of restricting wood frame construction in a City that is facing an unprecedented housing shortage, a homelessness crisis and a global pandemic will do nothing to prevent urban wildfires. Moreover, the State of California has recently adopted building code standards that reflect the increasingly supportive and beneficial nature of mass timber construction, not only from a cost and materials perspective, but also due to environmental benefits.

### **FACT: Certain Types Of Wood Construction Are Prohibited In Fire District One**

Fire District 1 has been in place at least since 1913 and is an antiquated restriction on some types of wood construction that is left over from the days of no sprinkler systems and lack of modern building construction.

The City's Building Code prohibits the use of Type IV and V construction materials in Fire District One.

- Type IV materials include heavy timber, a that type of construction in which currently the [exterior walls](#) are of [noncombustible](#) materials, Fire Retardant Treated Wood (FRTW) or Cross Laminated Timber (CLT) and the interior [building elements](#) are of [solid](#) or laminated wood without concealed [spaces](#).

## **Fact: Measure HHH Projects Are Largely Wood Framed Construction**

Based on recent reports from the [Prop HHH Administrative Oversight Committee](#), as of [December 2020](#), the City has already allocated well over \$400 million dollars to fund affordable housing projects within the City of Los Angeles. By expanding Fire District One, the City will effectively prevent the continued development and construction of affordable housing projects.

Even a cursory view of the December 2020 updated [project list](#) from the Housing and Community Investment Department clearly illustrates the vast number of wood frame construction projects that the City has already approved. Adopting the motion as drafted will have a substantially negative impact on housing in the City of Los Angeles.

## **FACT: Built To Code Is Safe, Including The Use Of Mass Timber**

The City of Los Angeles currently allows for wood frame construction materials to be used because it has been deemed safe for construction and for fire safety. There is no need for the proposed changes because the City follows both State and International Building Code, which supersede and compliment the City code.

- In accordance with the International Code Council (ICC) International Building Code (IBC), which is reviewed and adopted in the state every three years, in California, light wood frame and mass timber can be used to construct certain non-residential buildings up to 270 feet tall or eighteen stories, such as a business use, in the 2021 edition of the IBC.
- Currently, multi-family residential Buildings can be built currently up to 5 stories using wood exclusively.

## **FACT: The State has already approved the use of mass timber products in the recent update of the CA Building Code (CBC):**

The California Building Standards Commission has approved the inclusion of Tall Wood criteria from the 2021 International Building Code. Tall wood is generally Type IV materials, which would be prohibited in the proposed motion. The criteria will be included in the July 2021 Supplement to the CBC with an effective date of July 1, 2021. The California State Fire Marshal has also indicated their support of the Tall Wood criteria. This approval does not have any limitations for use in Wildland Urban Interface areas.

## **FACT: The Department of Building and Safety are already on the record supporting wood frame construction for residential construction**

In 2016, the Department of Building and Safety [responded the questions](#) in CF# [16-1165](#) from Councilmember Blumenfield specifically regarding wood framed construction. When asked about the dangers of wood in residential construction, the department responded:

“Unprotected wood is fire hazard. However, the code requires wood to be treated with fire retardant chemicals and wrapped into fire resistance drywalls when wood is

used in more than three-story high building. This construction type has been in use for many years.”

**FACT: Governors Newsome and Brown understand wood construction benefits the environment.**

New Type IV A, B and C construction is being supported by the CA Governor’s office initially through Executive Order B52-18 for early adoption because the new types of construction promote forest health and result in carbon sequestration as an alternate to concrete and steel construction which requires more embodied energy to construct while liberating more CO2 into the atmosphere.

The American Wood Council understands the ongoing concerns and dangers posed by wildfires and appreciates the continued opportunity to dialogue with the City on how together we can create a safer environment for residential construction. It is our goal to partner with the City to convene and discuss how our experience can integrate with the City’s overarching policy goals of preventing wildfires.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Dodson', with a long horizontal stroke extending to the right.

Andrew Dodson  
Vice president, government affairs