

PARK LA BREA
APARTMENTS

December 5, 2018

The Honorable Mitchell Englander
Los Angeles City Council, District 12
Public Safety Committee Chair
200 N. Spring Street, Room 405
Los Angeles, CA 90012

Date: 12/05/2018
Submitted in Public Safety Committee
Council File No: 04-1672-51
Item No.: 2
~~Deputy~~ Communication from Public

Dear Chairman Englander:

On behalf of Park La Brea, the largest multi-family residential development west of the Mississippi River with 4,255 rent-stabilized units on 160 acres in Council District Four, I want to express concern over Item #2 on today's Public Safety Committee agenda which could prove to be an overreaching mandate requiring that all residential high-rise buildings built between 1943 and 1974 must install fire sprinklers.

While the Koretz-Ryu motion cites recent fires such as the July 2017 Marco Polo fire in a Honolulu, HI high-rise, comparisons to Los Angeles-area buildings and structures such as those that exist at Park La Brea, are incompatible with the facts:

The Marco Polo fire resulted from a combination of factors that caused the fire to spread rapidly, including a unique set of unsafe conditions and building features, and a lack of the modern fire safety measures that are common in most Los Angeles structures and required by existing Los Angeles regulations.

Our review shows that the 2017 tragedy in Honolulu ultimately has little in common with Los Angeles's existing regulatory environment or area structures like the towers at Park La Brea. By contrast, **Park La Brea has broad fire safety measures and significant structural differences that would not allow the similar spread of a fire.**

Further, **Los Angeles already has sprinkler retrofit ordinances for residential fire safety** - the Dorothy Mae ordinance and the High Rise Retrofit ordinances of 1988 and 1989.

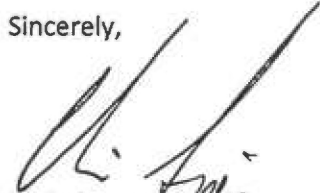
Interestingly, this same debate over requiring residential high-rises to be sprinklered occurred in 1993 and was opposed by a 14-0 vote of the City Council following extensive debate and public protest. The arguments remain the same: the high costs for apartment owners, and unaffordability for condominiums, especially smaller associations, as well as the sufficiency of existing fire safety measures. Rent control and non-ductile concrete retrofit requirements further exacerbate the impact on buildings affected. **And, the already sky-high rents would not withstand another pass-through that has not been shown to be necessary.**

Additionally, since the 1993 effort, general fire prevention, DBS Code Enforcement and Housing Department practices have improved, and the LAFD Regulation 4 program has become significantly

more stringent. Additionally, NFIRS data indicates deaths in multi-family residential structures have shown a national 10-year 3.1% downward trend.

I understand that you would like to vet this issue again and in so doing, I request to be included in the conversation as Park La Brea is a significant housing provider and member of the California Apartment Association, Los Angeles Chapter and the Apartment Association of Greater Los Angeles, as well as other notable business and civic organizations.

Sincerely,



Chris Scroggin ^{CPM}[®]
Senior Vice President of Operations
Prime Group

cc: The Honorable Paul Koretz
The Honorable David Ryu



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Date: 12/05/2018

Submitted in Public Safety Committee

Council File No: 04-1672-S1

Item No.: 2

Deputy: Communication from Public

December 5, 2018

The Honorable Mitchell Englander
Los Angeles City Council, District 12
Public Safety Committee Chair
200 N. Spring Street, Room 405
Los Angeles, CA 90012

RE: Opposition to 04-1672-S1

Dear Chairman Englander:

On behalf of the California Apartment Association - Los Angeles Chapter (CAA-LA), I would like to submit this letter of opposition to Councilman Koretz's motion, item #2 on today's Public Safety Committee agenda, calling for all high-rise apartment buildings built between 1943 and 1974 to install fire sprinklers.

While CAA-LA is committed to sound safety ethics and practices, we know that a one-size-fits-all approach is not the answer. The LAFD Fire Prevention Bureau report identifies 55 buildings that fall into this category, but not all of those buildings are identical. In fact, some of those buildings are constructed with concrete and steel, materials well-known to deter fires because of their noncombustible properties.

In reviewing the report's estimated costs associated with sprinkler retrofits, we believe the estimates are low and unrealistic.

Additionally, some of these buildings are already being required to undergo seismic retrofits due to their non-ductile concrete construction, a price tag that most property owners can't afford and others can barely manage to finance.

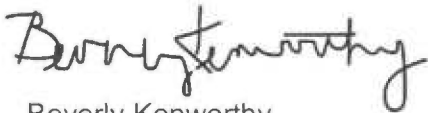
Not only is this detrimental to property owners, but it's a hardship to tenants given that the property owner will be forced to pass through the cost to the tenant and will impact rents that are already at all-time highs.

As a reminder, the City Council already considered this policy change and after hours of public discourse, voted unanimously to abort the idea.

For the reasons stated above, we urge you to study each of the 55 identified apartment buildings as individual case studies given their unique characteristics, construction materials, fire life safety precautions and geography.

Thank you for considering our request. Please let us know if we can answer any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly Kenworthy".

Beverly Kenworthy

Vice President, Public Affairs