

Your Community Impact Statement has been successfully submitted to City Council and Committees.

If you have questions and/or concerns, please contact the Department of Neighborhood Empowerment at NCsupport@lacity.org.

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Contact Information

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The Board approved this CIS by a vote of: Yea(16) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 12/21/2021

Type of NC Board Action: Against

Impact Information

Date: 01/05/2022

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 19-0603

Agenda Date:

Item Number:

Summary: [SEE ATTACHED .PDF FOR FULL CIS] This proposal would restrict the use of wood frame construction, including newly allowed mass timber construction, in parts of the city that are most suitable to construction of apartments, both affordable and market rate. The purported reason for the proposal is protection against fires in general and wildfires in particular. However, the proposal is being pushed not by fire agencies, but by the concrete industry, apparently to outlaw competition. City staff has prepared a report concerning FD1, concluding: Historically, Fire District 1, which covers the densest parts of Los Angeles, was created in the early years of the last century to address urban conflagrations (no longer a major concern), not wildfires, the purported reason behind this council file. Existing fire regulations are adequate to deal with fire risk in the proposed expanded Fire District 1. Construction costs will increase greatly. This CF would also prohibit in FD1 the newly allowed mass timber construction, potentially much cheaper than concrete or steel. No other California jurisdiction has adopted anything like Fire District 1. This CF would require a finding that it is necessary to address “local climatic, geological, or topographical conditions.” (Such a finding would be strained to mendacious.) Moreover, this proposal would have an adverse environmental impact, as concrete and steel construction have a much greater carbon footprint than wood. In fact, development may be pushed to remote locations (“sprawl”), most subject to wildfire risk. Therefore, the Los Feliz Neighborhood Council urges the City Council to reject this proposal and also urges it to consider doing away with Fire District 1 altogether



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- COMMUNITY IMPACT STATEMENT -

Council File: 19-0603

Title: City Building Code Fire District 1 Expansion / California Department of Forestry / Fire Protection Very High Severity Zone / City High Wind Velocity Zone / Ordinance

Position: Oppose

This proposal would restrict the use of wood frame construction, including mass timber construction, in parts of the city that are most suitable to construction of apartments, both affordable and market rate. The purported reason for the proposal is protection against fires in general and wildfires in particular. However, the proposal is being pushed not by fire agencies, but by the concrete industry, with all the appearances that it is a naked attempt to restrict competing, cheaper building products.

City staff has prepared a report in response to a City Council request examining several issues concerning this proposal. Its conclusions negate rather than support the proposal. Historically, Fire District 1 was created in the early years of the last century, when conflagrations such as that resulting from the 1906 San Francisco earthquake and fire were still a significant hazard. Its present configuration covers the densest parts of the city rather than those bordering potential wildfire areas, and this proposed expansion would not change that. Nonetheless, this proposal is being pushed as a way of addressing wildfires. As the staff report makes clear, existing fire regulations are adequate to deal with fire risk in the proposed expanded Fire District 1.

As the staff report also makes clear, construction costs will increase greatly if this proposal is adopted. Los Angeles needs to greatly expand its housing stock, and anything that increases the cost of housing construction should be considered only where there are countervailing and compelling benefits. In theory, there could be a trade off between fire safety and housing needs, but in this case there isn't one since the fire benefits of this proposal are minimal to nonexistent.

As the staff report also notes, a survey of other jurisdictions in California shows that no other jurisdiction has felt it necessary to adopt anything similar to Fire District 1.

Newly enacted changes to the building code for the first time allow mass timber construction, which has the potential to greatly reduce the costs for certain types of buildings by substituting mass timber structural elements for concrete or steel. The benefits of mass timber construction would be unavailable in significant parts of the city if this proposal is adopted.

Moreover, this proposal would have an adverse environmental impact. Best case, a building that could be built with wood frame construction would still be built, but with concrete and steel, which have a much greater carbon footprint than wood. Worst case, the building does not get built in Los Angeles at all, resulting in substitute housing being constructed, if at all, at remote locations ("sprawl"). Ironically, this construction would be more likely to take place in exactly those areas subject to wildfire risk.

As the staff report establishes, the expansion of Fire District 1 would require a finding that is necessary to address "local climatic, geological, or topographical conditions." Since such conditions do not exist, any findings to the contrary would be strained to mendacious.

Therefore, the Los Feliz Neighborhood Council urges City Council to reject this proposal and also urges it to consider doing away with Fire District 1 altogether.

-APPROVED-

December 21, 2021

Yay: 16. Nay: 0