

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](mailto:NCsupport@lacity.org).

This is an automated response, please do not reply to this email.

#### Contact Information

Neighborhood Council: Eagle Rock Neighborhood Council

Name: Richard

Phone Number:

Email: [richard.loew@ernc.la](mailto:richard.loew@ernc.la)

The Board approved this CIS by a vote of: Yea(17) Nay(0) Abstain(0) Ineligible(0) Recusal(0)

Date of NC Board Action: 08/03/2021

Type of NC Board Action: Against

#### Impact Information

Date: 08/04/2021

Update to a Previous Input: No

Directed To: City Council and Committees

Council File Number: 19-0603

Agenda Date:

Item Number:

Summary: The Eagle Rock Neighborhood Council strongly opposes Council File 19-0603 and the expansion of Fire District 1. We strongly recommend that the City of Los Angeles vote down this proposed expansion and instead use this opportunity to repeal the entire outdated and archaic Fire District 1 classification. Significant portions of our neighborhood are with the Very High Fire Hazard Severity Zones (VHFHSZ) and while this measure originally was proposed as a mechanism to increase safety in these areas, as currently proposed it would only increase the cost of housing production with no fundamental safety improvements to our community.

**EAGLE ROCK  
NEIGHBORHOOD COUNCIL**

**Executive Committee**

Richard Loew, President  
Michael Sweeney, Vice President  
Lindsay Kiesling, Treasurer  
Wade Harpootlian, Communications  
Laura Gonzalez, Secretary  
Jesse Saucedo, Immediate Past President

**CITY OF  
LOS ANGELES  
CALIFORNIA**



P.O. Box 41652  
Los Angeles, CA 90041

[www.ernc.la](http://www.ernc.la)  
[info@ernc.la](mailto:info@ernc.la)

August 3, 2021

Los Angeles City Council  
200 N. Spring St.  
Los Angeles, CA 90012

**RE:** Community Impact Statement - [Council File: 19-0603](#) - City Building Code Fire District 1 Expansion / California Department of Forestry / Fire Protection Very High Fire Severity Zone / City High Wind Velocity Zone / Ordinance

On August 3, 2021 a Brown Act noticed public meeting was held with a quorum of board members present and that by a vote of 17 yes, 0 no, and 0 abstentions, the Eagle Rock Neighborhood Council (ERNC) adopted the following Community Impact Statement concerning [CF 19-0603](#).

**The Eagle Rock Neighborhood Council strongly opposes Council File 19-0603 and the expansion of Fire District 1. We strongly recommend that the City of Los Angeles vote down this proposed expansion and instead use this opportunity to repeal the entire outdated and archaic Fire District 1 classification. Significant portions of our neighborhood are with the Very High Fire Hazard Severity Zones (VHFHSZ) and while this measure originally was proposed as a mechanism to increase safety in these areas, as currently proposed it would only increase the cost of housing production with no fundamental safety improvements to our community. The Department of Building & Safety's [report to Council on the proposed ordinance](#) estimates that *this one change would increase the per-unit construction cost between 10.6% to 47.1%*. Expanding Fire District 1 will reduce the financial feasibility of affordable housing projects and result either in less affordable housing built in the City, or will require increasing the public subsidies for these projects.**

The Blumenfield-Rodriguez measure seeks to expand the [Fire District 1](#) which severely restricts the type of construction, building materials, and lot setbacks that can be applied to properties within those zones. This is an outdated legal and land-use relic that (as per the Department of

Building and Safety's own report on the subject) has no corollary in other comparable jurisdictions and that exists outside of the normal mechanism of code-updates (the triennial California Building Standards Commission update cycle). This an outdated designation created over 100 years ago and that ignores decades of technological and infrastructural improvements and which includes duplicative and (in the case of its rated opening requirements) outmoded fire-safety mechanisms that do little to make our city safer, but (as documented by LADBS) can and do increase the construction cost of housing.

As a neighborhood with many, many homes in the VHFHSZ and wildland-interface, we are deeply troubled that the effects of banning wood-construction elsewhere with further exacerbate the severity of climate-change-magnified wildfires. By forcing building construction to be more CO2 intensive through use of building materials rather than less will make our our neighborhood more imperilled. This limitation of acceptable building materials does not align with the statewide California Building Code (CBC/Title 24), which updated every three years, nor is it justified by the CBC which is seen as the benchmark for building safety and energy-use standards nationwide. The use of concrete is the source of about 8% of the world's CO2 emissions, whereas responsibly farmed timber is a carbon sink. Our City is *already being ravaged by wildfires whose severity is directly magnified by wildfires* and the City should be looking at ways to mandate construction that involves less CO2 emissions (such as mass-timber), not mandating construction that is more CO2 intensive (such as reinforced concrete and steel).

In order to be a vibrant and thriving community, we must expand our access to affordable housing built around mass transit while also maintaining the uniqueness and specificity of our various neighborhoods. It is these transit-rich corridors which are precisely the portions of the city which will be most adversely affected by expanding Fire District 1 since the proposed ordinance uses density as a proxy for wildfire risk, and would give any neighborhood with a density above 5000 people per square mile the Fire District 1 designation. Those are precisely the portions of the city where cost-effective housing is most urgently needed and the Fire District 1 ban on Type-IV (heavy timber) and Type-V (wood-frame) construction would eliminate one of the main mechanisms by which we are currently able to produce low- and mid-rise housing. If these construction types are banned, the only projects that will pencil in these corridors will be much taller, much denser towers which can amortize the increased construction cost over more units and more-expensive units. New type IV and type V structures, including multi-family residential buildings, are fire-safe under current building codes and can be built more efficiently and flexibly within our existing neighborhoods as opposed to Type I, II, and III structures.

The cost to build new homes in Los Angeles is already too high, which has reduced the amount of permanent supportive, affordable, and market-rate housing constructed in recent years and contributed to a severe increase in homelessness and housing costs. The last thing any member

of our City Council should be proposing is even larger costs and ever larger deficits between the demand for housing in our City and its supply.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Loew', with a stylized flourish at the end.

Richard Loew  
President  
Eagle Rock Neighborhood Council