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Draft 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

The Woodland Hills – Warner Center Neighborhood Council [WHWCNC] strongly opposes Council File 19-0603. The expansion of Fire District 1 will increase the cost of housing in Los Angeles when there is a shortage of housing already. Instead, WHWCNC recommends that the City of Los Angeles take action against this directive and eliminate the outdated Fire District 1. Los Angeles created Fire Districts in 1943, but Los Angeles eliminated Fire Districts 2, 3, and 4 as unnecessary. It's time to end Fire District #1 and rely on more modern superior building codes instead.

The recent report back from the Department of Building and Safety found that building costs would increase 10.6% to 47.1% if the City enacted the ordinance. It also concluded that an expansion of Fire District 1 would likely reduce the financial feasibility of affordable housing projects and may result in fewer affordable housing units in the City. Fire District 1 is a relic of the era before modern building standards and offers no known fire safety benefit beyond the current standards of the International Building Code. This change in acceptable building materials does not align with the direction of the statewide California Building Code, which is both frequently updated and seen as the benchmark for California building standards.

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 the cost of housing. WHWCNC applauds careful and well-thought-out fire safety measures. Still, we find the density rules in this directive would significantly affect the Warner Center Specific Plan's housing goals. They make it much more expensive to build and invest in Warner Center with little to no additional safety benefit for our community against "wildfires." In truth, promoting tall-timber construction using cross-laminated timber products would improve the feasibility of building taller residential units in Warner Center than are currently proposed. A recent project approval in Warner Center reduced the minimum required height in exchange for some affordable housing due to the costs of hi-rise construction. By not facilitating hi-rise residential, the City inevitably forces the expansion of density outside of Warner Center.

Now that Woodland Hills has increasing temperatures and the City has a severe housing shortage, it makes no sense to make multi-story construction in our communities take longer to build, more expensive, and less ecologically friendly. It also makes no sense that this policy targets Regional Centers and Commercial Corridors that do not have nearby grasslands and woodlands that might represent a wildfire risk.

However, by forcing building construction to use building materials whose production is more CO_2 intensive, this City Council directive potentially contributes to more frequent future wildfires. Assuming that our intent is reducing our risks of wildfires, the City should be looking at ways to encourage construction techniques that involve less CO_2 emissions, not mandating construction methods that are more CO_2 intensive.

Suppose the City enacts the original proposed ordinance. Consequently, the City favors concrete and steel industries that contribute 15% of greenhouse gases toward climate warming. At the same time, it disfavors the competing mass-timber sector, which uses fast-growing timber to sequester more carbon than is produced in housing production. One metric ton of wood sequesters one-and-a-half metric tons of CO_2. The best that cement can do is a net-zero production of carbon. A reverse initiative

should be the legislative goal. A better code requires concrete and steel construction only for building heights and uses that are not feasible using mass-timber technology?

Looking at major California cities, the Fire District 1 designation is unique to Los Angeles, created about 80 years ago to address insurability issues for buildings constructed before the advent of modern construction techniques and sprinkler systems. Simply put, a Fire District 1 designation severely restricts the type of construction, limits building materials, and mandates minimum lot setbacks that apply to properties within the designated zones. The motion, as initially proposed, prohibits residential buildings over 30-feet tall from using Type IV and V (stick) construction. Also, many proponents do not realize that these requirements would directly conflict with the setback allowances of Transit Oriented Communities under Measure JJJ for building new affordable units and would consequently disincentivize builders from offering affordable units.

It's misleading to justify these new Fire District 1 building codes as helping our community mitigate "wildfire" risk based on the recent "Woolsey" "wildfire" that affected primarily single-family homes. Instead, without adequate justification of the need, the hidden purpose is to ostensibly mitigate the risk of arson-related multi-family construction fires like the DaVinci fire and "high-density urban fires by subverting the International Building Code. The DaVinci fire was in Fire District 1.

The proposed Blumenfield/Rodriguez ordinance expanding Fire District 1 designations tries to equate residential high-density with "wildfire risk." It would give any neighborhood with a residential density above 5000 people per square mile the Fire District 1 designation. Reseda, Canoga Park, and Winnetka, located miles from grasslands and woodlands, have population densities well above the limit. Warner Center, a Regional Center, has many times the limit. Yet, due to its lower density, Tarzana would essentially not be affected by these restrictions, despite having a much higher wildfire risk from adjacent grasslands and woodlands and not subject to Fire District 1 requirements.

Mass-timber has already demonstrated extreme fire resistance and earthquake resistance. Notably, it takes significantly less time to build with mass-timber. Compared to concrete and steel construction, mass-timber buildings have as little as 20% of the mass, reducing construction and transportation costs while improving earthquake resistance. Because of the reduced mass, concrete foundations can be smaller. Wood is the only wholly renewable building material. Wood products have less embodied energy, are responsible for less air and water pollution, and have a lighter carbon footprint compared to other building materials.

Mass-timber (Tall-timber) hi-rise buildings have already been built in Europe and built or approved in major cities across this nation. The 2021 International Building Code includes three new construction types—Type IV-A, IV-B, and IV-C — which allow mass timber or noncombustible materials in buildings up to 18, 12, and nine stories (respectively). Architects and engineers conduct design research toward increasing the limits. California will soon add this innovative construction material to the statewide building code.

To be a vibrant and thriving city, we must expand our access to affordable housing built around mass transit. Why is Los Angeles marching in the opposite direction as the rest of the world? Milwaukee approved the construction of a 25-story, 284-ft-tall building (consisting of a six-story concrete podium, 19 stories of mass-timber multi-family units, and 25 stories of concrete core walls). Such a building would fit well in Warner Center.

Instead, the effect of the Blumenfield/Rodriguez motion is to ban type IV (heavy timber) and V (wood-frame) construction for larger projects in areas with 5,000 or more residents per square mile. These areas represent a large part of the City, including many of Los Angeles' most walkable and transit-rich communities, where we should be encouraging new housing.

Why doesn't this motion focus on the actual safety risk of fires in parts of the City exposed to real wildfires as it claims? New type IV and type V structures, including multi-family residential buildings,

utilizing mass-timber are fire-safe under current building codes. They are also less costly to build than structure Types I, II, and III required under Fire District 1.

So, we ask, is this proposal, introduced in 2019, nothing more than a cynical attempt by the concrete and steel industries to prevent the proliferation of mass timber? Public records show a public relations representative (lobbyist) has contributed for Build with Strength over $650,000 since the beginning of 2017; over $134,000 just in 2021. Build with Strength promotes using concrete for buildings over wood construction.

To reiterate, the use of concrete and steel for construction is the source of about 15% or more of the world's CO_2 emissions. In contrast, responsibly-farmed timber used in mass-timber is a carbon sink (removing more carbon from the atmosphere than it adds).

The Woodland Hills – Warner Center Neighborhood Council urges the City Council **to stop work** on this measure and focus on implementing mass-timber in the municipal code as permissible for structures within the limits of mass-timber technology.