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October 12, 2020

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County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple St. Ste 383
Los Angeles, CA 90012

Re: 10/13/20 BOS Agenda Item #8 OPPOSE – Very High Fire Hazard Severity Zones (VHFSZ) County Legislative Priority

Dear Supervisor Barger,

The Los Angeles/Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIA-LAV), is a non-profit trade association focused on building housing for all. On behalf of our membership, we would like to express our concerns and opposition to the Very High Fire Hazard Severity Zones (VHFSZ) County Legislative Priority. The County of Los Angeles has been facing a historic housing crisis, made worse by the crippling pandemic induced recession. Now, more than ever, it is imperative that housing be built and planned for safely, using our meticulously prepared, tested and proven fire safety guidelines.

We are deeply concerned that this Motion introduces an uneven solution to fire safety, through the reduction of much needed housing. This motion fails to address on-going County enforcement and monitoring of defensible space. We have the right tools and mitigations in place, and we should reinforce those life and property saving tactics with assurance that enforcement is happening regularly. Due to these concerns, we are asking that County staff be directed to review all the strategies found in the Governor's wildfire and climate change document. This will more adequately meet the needs of the County to comprehensively increase fire safety and protection.

BIA-LAV and its members are deeply committed to fire safety and mitigation throughout the entirety of the homebuilding process. In fact, new construction has led the way in the adoption of natural resource



resiliency and fire safety. California and Los Angeles County have some of the highest fire mitigation standards in the Country. California's Building Standards Code (Title 24, Parts 1-12) has been updated every 18 months with new editions of the codes published every three years to dictate fire safety compliance. In 2008, homebuilding fire safety standards were further enhanced when the California Code of Regulations (CCR) was updated to include Title 14, Natural Resources Department of Forestry & Fire Protection, Chapter 7: Fire Protection, Article 2: Emergency Access and Egress. During that same time, the first full iteration of the Wildland-Urban Interface (WUI) fire safety standards also took effect. When reviewing the State building code, experts agree that California is on the forefront of fire safety.

Fire safety and mitigation regulations aren't limited to State implementation. The County of Los Angeles has a [Fire Prevention Division](#) focused on educating the community about the benefits of proper safety practices and identifying and eliminating all types of hazardous conditions. The Division is also responsible for conducting new construction field inspections, plan checks for building, processes and fire extinguishing, and attend meetings with Building and Safety officials, Federal, State, City and County officials. The County ensures compliance and efficiencies with regulations and procedures, such as retrofitting, fireproofing, sprinkler installation, fire alarm, and fire life safety standards. Additionally, the County of Los Angeles' Department of Public Works - Building and Safety Division has an entirely [separate process](#) for buildings and infrastructure in high fire severity zones. This robust fire inspection management system enforces strict standards to ensure fire safety and is codified within the County's code. The codes are regularly updated to address new risks and changes to State law. The County has gone even further to ensure that Significant Ecological Areas (SEA) and other VHFSZ, such as the Santa Monica Mountains, have limited development activity enforced by strict building codes. The objective of these ordinances is to increase biodiversity and resiliency. These limited development standards are guided through goals and policies of the General Plan's Title 22 zoning regulations.

Furthermore, we know that the homebuilding processes and the homes built under the State's strict building codes help to mitigate fire danger. Even in the worst fires, like the Camp Fire in the City of Paradise, new homes and new construction are at a much lower risk and better protected, due to compliance with State level regulations. According to a [Sacramento Bee](#) investigative report, fewer than three percent of the homes in the path of the Camp Fire were built after 2008. This means that homes built under the State's current WUI and Title 14 fire regulations had a significantly better chance of survival. Today, new housing construction is better equipped for California's wildfire threat because of the success of our State Building Codes when combined with defensible space maintenance.

We understand that wildfires are dangerous, and the homebuilding and construction industries take fire safety responsibilities seriously. As previously described, all new, production-housing development is continually inspected for compliance throughout the land prep/development and construction processes. The Motion cites the Governor's "[Wildfires and Climate Change: California's](#)



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[Energy Future](#)” document as a guide for what type of local legislation to support. There are many recommendations found in this document, including the State partnering with local government to encourage updates to local emergency plans, the increase of resident awareness of those plans, and improvements to emergency prevention and response efforts. There is also an emphasis to encourage local governments to adopt recently issued guidelines to improve communications during an emergency, the creation of a methodology to better assess communities at-risk, the development of a forest management task force, and climate and energy updates. These outline ways that the County can address fire safety through a true multipronged approach. The recommendations related to land use do not go as far as this Motion seeks to move and focuses on a balanced approach for the production of housing.

For the many reasons outlined in this letter, we urge you, your colleagues and City staff to consider our concerns, and review all the strategies for fire prevention. Relevant County departments can help to identify alternative solutions to meet the goals sought through this Motion. BIA-LAV looks forward to working with the Supervisors and County staff on this item. Should you have any questions, please contact BIA-LAV Vice President, Diana Coronado, at dcoronado@bialav.org.

Sincerely,

Diana Victoria Coronado
Vice President
BIA-Los Angeles/Ventura

CC:

County of Los Angeles CEO
County of Los Angeles Fire Department
County of Los Angeles Regional Planning Department
County of Los Angeles Public Works Department

Sent via e-mail