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October 1, 2020

Councilman Marqueece Harris-Dawson
Planning and Land Use Management Committee
Los Angeles City Hall
200 N Spring St, Room 1010
Los Angeles, CA 90012

Re: Hillside Construction Regulation (HCR) Supplemental Use District (SUD) / Very High Fire Hazard Severity Zones (VHFSZ) / Council District 4 Hillsides / Citywide / Ordinance Amendment (Council File: 20-1101) – BIA-LAV COMMENT LETTER

Dear Chair Harris-Dawson,

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 comments on the Hillside Construction Regulation (HCR) Supplemental Use District (SUD) Motion before the Planning and Land Use Management (PLUM) Committee, today.

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; and the City of Los Angeles is at the forefront of fire protection. Aside from the HCR SUD Ordinance, the City of Los Angeles has a Fire Prevention Bureau tasked with the investigation of the cause, origin, and circumstances of fires, the City's Department of Building and Safety (LADBS) works with the City of Los Angeles Fire Department (LAFD) to ensure compliance and efficiencies with regulations and procedures, and the City has a robust fire inspection management system that enforces standards for new construction. These efforts work in tandem with State level regulations, including California Code of Regulations (CCR) includes Title 14, Natural Resources Department of Forestry & Fire Protection, Chapter 7: Fire Protection, Article 2: Emergency Access and Egress, and the Wildland-Urban Interface (WUI). As reflected, the State and City have made important strides to address the risks to reduce fire danger.



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With these fire safety practices in mind; we want to address some of the concerns referenced in the Motion. The Item is written in a way to allude that a reduction in construction hours, through the increase of HUD SUD areas, would result in better fire safety protection. This is worrisome because it suggests that being near construction presents some type of fire risk. We do not have data that day-time construction results in a higher fire threat, increases the risk of fire danger or results in fires. We would be interested to see the information that was used to make these determinations to better address the problems that are seeking to be remedied with this Motion. The Motion also suggests concerns related to ingress and egress. These challenges are already codified and being mitigated for through current construction practices, as described above.

Additionally, if this motion were to pass and extend itself beyond the current piloted areas it would limit the hours of exterior construction work, hindering project completion and hurting the homebuilding process. This would not only affect the production of severely needed housing, but it would hamper current construction jobs. An unplanned reduction in hours would have an adverse effect on employee incomes, resulting in a negative impact to the local economy. In the midst of a pandemic, the protection of housing opportunities and jobs should be considered.

The homebuilding and construction industries take fire safety responsibilities seriously, and we ask that relevant City departments weigh-in to provide insight on how this Motion would increase fire safety and what are the best strategies to reach that goal. BIA-LAV looks forward to working with the Council and City staff on this Motion. Should you have any questions, please contact Diana Coronado at dcoronado@bialav.org.

Sincerely,

Diana Victoria Coronado

Vice President

BIA-Los Angeles/Ventura

CC:

The Honorable Eric Garcetti, Mayor

The Honorable Nury Martinez, Council President

The Honorable Gil Cedillo, Councilmember, PLUM Committee

The Honorable Paul Krekorian, Councilmember

The Honorable Bob Blumenfield, Councilmember, PLUM Committee

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The Honorable Marqueece Harris-Dawson, Councilmember, PLUM Committee Chair

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The Honorable Jose Huizar, Councilmember
The Honorable Joe Buscaino, Councilmember
Holly L. Wolcott, Los Angeles City Clerk
Leyla Campos, Legislative Assistant

Sent via e-mail