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WILDLAND URBAN WILDFIRE COMMITTEE

March 16, 2021

Los Angeles Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, California 90012
VIA Email: hollywoodplan@lacity.org
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**Re: Hollywood Community Plan Update, CPC-2016-1450-CPU, ENV-2016-1451-EIR
Adopt Policies to Protect Very High Fire Hazard Severity Zones**

Honorable Planning Commissioners:

The Sierra Club Wildland Urban Wildfire Committee was formed to address land use planning and other issues related to the increasing intensity and frequency of wildfires in the Wildland-Urban Interface (WUI). Our mission is to assess the risks associated with building in the Very High Fire Hazard Severity Zones (VHFHSZs)ⁱ and influence policies to reduce those dangers while protecting the environment through education, organizing, and policy change.

Despite the fact that Hollywood hillsides represent more than half the land area of the Hollywood Community Plan (Plan) (see HCP Feb 2021 DRAFT, Figure 1-1),ⁱⁱ the Draft EIR concludes that impacts related to wildfire are “less than significant.” According to wildfire experts, “to stop the destruction”ⁱⁱⁱ of our communities by wildfire we must focus on strategies that will work in our rapidly changing environment: reduce the flammability of existing communities and prevent new ones from being built in very high fire hazard severity zones.” Ninety-five percent of all fires^{iv} in the Santa Monica Mountains are caused by human ignition sources. Combined with the impacts of climate change:^v prolonged drought, hotter temperatures, lower humidity, and more frequent, persistent, and stronger Santa Ana winds, these forces have extended the fire season into a year-round cycle and will continue to cause more destructive and deadly wildfires.

We urge the City Planning Commission to recommend that the City adopt strong policies, procedures, and goals to implement hardening strategies to apply to existing development, and to prohibit new development, in VHFHSZs as part of the Hollywood Community Plan update. These policies align with recently adopted resolutions by Sierra Club California and the Los Angeles County Democratic Party:

Sierra Club California: “supports policies that prohibit new building in Very High Fire Hazard Severity Zones, consistent with established Sierra Club infill policy, to respond to increasing intensity and frequency of devastating wildfires on lives, habitat, property, infrastructure, and the environment.” (Adopted: August 22, 2020)

Los Angeles County Democratic Party: “calls on our state leaders to reconsider the approval of increased developments in Very High Fire Hazard Severity Zones near or in wildland-urban interface areas, and seeks strong regulations and limits on new structures, as these buildings have been found to increase the size and destructive nature of our state’s worst fires.” (Adopted: September 22, 2020)

A 2019 report prepared by Governor Newsom’s Strike Force charged with examining California’s catastrophic wildfires, climate change and energy warns that wildfires are not only more frequent, but more devastating. The Strike Force’s report concludes that local governments must “begin to deprioritize” new development in areas of the most extreme fire risk, reduce the incidence and severity of wildfires, and step-up community resilience and the state’s response capabilities (“Wildfires and Climate Change: California’s Energy Future”).^{vi} To accomplish this, the report recommends that we must:

- Make communities more resilient;
- Strengthen evacuation;
- Improve land use practices to reduce damage to life and property;
- Encourage other emergency planning;
- Update codes that govern defensible space.

Local elected officials have also recognized the dangers associated with continuing to build in Very High Fire Hazard Severity Zones:

- Feb. 2020 (Reduce Damage to Life and Property from Wildfires): the Los Angeles County Board of Supervisors voted to amend^{vii} Title 21 and 22 to help prevent and reduce damage to life and property in the event of extreme, wind-driven wildfires by requiring that new developments pass strict tests for egress, setting new, higher standards for length of time for safe community evacuation, mandatory denial recommendation of any project shown to compromise public safety, and denial recommendation if plan amendments would increase allowed density/intensity within fire zones.
- Oct. 2020 (Very High Fire Hazard Severity Zones County Legislative Priority): the Los Angeles County Board of Supervisors voted to oppose^{viii} new proposals that would increase housing density in Very High Fire Hazard Severity Zones. This advances Newsom’s recommendation that local governments begin to deprioritize new development in areas of the most extreme fire risk and will address the growing number of legislative bills that would allow increased density in VHFHSZs.
- June 2020: San Diego County Supervisors rejected^{ix} the more than 1,700-home master-planned community in Lilac Hills Ranch over wildfire concerns. Fire officials and county staff said the project was especially dangerous because, among other things, residents would likely become trapped on the narrow winding, rural, two-lane roads during a wildfire evacuation.

- Sept. 2020 (Council Motion 20-1213): Councilmember Mike Bonin introduced^x a motion asking for a report on the capacity, safety, and viability of existing and potential evacuation routes in VHFHSZs, to identify the policies and development standards, including land use and building restrictions, necessary to support these evacuation routes and for the City Planning Commission to submit its report after reviewing the update to the Safety Element of the General Plan.
- Nov. 2018 (Council Motion 18-1120): Councilmember Mike Bonin introduced^{xi} a motion to strengthen the City's response to wildfires in the Wildland-Urban Interface, enhance coordination between City departments and outside agencies, and increase resiliency and recovery efforts after a major fire.
- Dec. 2019: Los Angeles City Councilmember Monica Rodriguez supported denial^{xii} of a large housing development in Verdugo Hills due to the risk of fire danger. Rodriguez said, "The subject's site topography and location within the city's very high fire hazard severity zone raises real questions about fire and life safety."
- Oct. 2018: Councilmember Paul Koretz opposed^{xiii} a plan to build a 99-room hotel/spa in Benedict Canyon on land zoned residential in the Santa Monica Mountains saying "I'm equally troubled by the potential environmental impacts... along with the possible impact of a project this size on fire safety."

California experienced the deadliest and most destructive wildfires in its history in 2017, 2018, and 2020. In 2017, nearly 9,000 wildfires tore through the state, burning 1.2 million acres of land, destroying more than 10,800 structures and killing at least 46 people. In 2018, a new record was set when 1.8 million acres burned. The Mendocino Complex fire earned the status as the state's largest fire on record, reaching 459,123 acres. The fire season in 2020, however, eclipsed both 2017 and 2018 and is by far the worst fire season recorded^{xiv} in California's modern history with approximately 8,200 individual fires and more than 4 million acres burned.

Los Angeles has seen its share of major fire events during the past decade. Community members have become increasingly accustomed to voluntary and mandatory evacuations. For example, the 2018 Woolsey Fire^{xv} swept from Simi Valley, jumped the 8-lane I-101 Freeway and Agoura Roads (an approximately 350' wide fire break), burned across the Santa Monica Mountains to the Pacific Ocean, destroying 1,600 structures, scorching almost 97,000 acres (88% of federally-owned parkland within the Santa Monica Mountains National Recreation Area burned), killing three people and prompting the evacuation of almost 300,000. The 2019 Getty Fire^{xvi} burned for seven days, destroying almost a dozen homes, threatening many more, and prompting the evacuation of approximately 10,000 people.

Inexplicably, the Hollywood Community Plan Draft EIR barely mentions fire prevention and safety measures. The City of Los Angeles must join with the state in adapting to this "new normal," by setting goals and policies to protect public safety. The Hollywood Community Plan update presents the perfect opportunity for Los Angeles to address critical issues facing the City's wildfire-prone areas starting with the Hollywood Hills. Adopting policies and implementation mechanisms to guide where and how we build to minimize the risk of loss of life, injury, damage to structures, and economic and social dislocations resulting from urban-area wildfires should be a *key* consideration of the Plan.

The Hollywood Community Plan must include current, science-based fire-prevention policy, new methods of minimizing damage to existing housing and other structures, and a policy that ***prohibits new building in the WUI in Hollywood***, namely the Plan's hillside areas. The Plan should also include a wildfire safety section to ensure a safe and healthy community for Hollywood residents as we combat climate change and ever-growing wildfire dangers. The Plan could then serve as an important model for other Los Angeles community plan updates with Very High Fire Hazard Severity Zone areas -- such as the Bel-Air Beverly Crest Community Plan and Brentwood-Pacific Palisades Community Plan.

The cost of not adopting sound wildfire prevention and safety policies is too great. Fires have already taken a devastating toll on:

- People: loss of life, property and pets; displacement and competition for affordable housing; public health impacts from exposure to airborne toxins and smoke; trauma to communities, and unequal vulnerability for communities of color;
- The economy: strain on resources; insurance; cleanup; collapse of infrastructure including utility lines, water storage systems, and roads;
- Ecosystems: impacts to the area's wildlife, wildlands, and habitat; climate goals setback: increases in greenhouse gases, release of toxic particles, carbon dioxide, black carbon, methane; and diminishment of air and water quality.

The Sierra Club Wildland Urban Wildfire Committee therefore urges the Los Angeles City Planning Commission to adopt explicit policies that limit new development within areas of extreme fire risk.

Sincerely,



Lynne Plambeck, Chair
Sierra Club, Angeles Chapter
Wildland Urban Wildfire Committee

cc:

CM Nithya Raman, CD-4

CM Paul Koretz, CD-5

CM Mitch O'Farrell, CD-13

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- ⁱ <https://data.lacity.org/Public-Safety/Very-High-Fire-Hazard-Severity-Zones/js76-xjtt>
- ⁱⁱ <https://planning.lacity.org/odocument/73938107-9332-404e-b2fa-75f8a0fe19ae.pdf>
- ⁱⁱⁱ https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/GovNewsom_Wildfires_2019.pdf
- ^{iv} <https://climatechangedispatch.com/study-humans-not-global-warming-sparked-almost-all-of-californias-wildfires/>
- ^v <https://www.edf.org/climate/heres-how-climate-change-affects-wildfires>
- ^{vi} <https://www.gov.ca.gov/wp-content/uploads/2019/04/Wildfires-and-Climate-Change-California%E2%80%99s-Energy-Future.pdf>
- ^{vii} <http://file.lacounty.gov/SDSInter/bos/supdocs/143863.pdf>
- ^{viii} <http://file.lacounty.gov/SDSInter/bos/supdocs/149574.pdf>
- ^{ix} <https://www.latimes.com/california/story/2020-06-24/san-diego-county-rejects-lilac-hills-ranch-housing-project>
- ^x http://clkrep.lacity.org/onlinedocs/2020/20-1213_mot_09-22-2020.pdf
- ^{xi} http://clkrep.lacity.org/onlinedocs/2018/18-1120_mot_11-20-2018.pdf
- ^{xii} <https://www.dailynews.com/2019/12/10/200-home-sunland-tujunga-development-rejected-by-la-city-council-committee/>
- ^{xiii} <https://saveourcanyon.la/9712-oak-pass-rd-position>
- ^{xiv} <https://www.latimes.com/california/story/2020-10-04/california-fire-season-record-4-million-acres-burned>
- ^{xv} <https://www.latimes.com/local/lanow/la-me-woolsey-resources-20190106-htmllstory.html>
- ^{xvi} <https://la.curbed.com/2019/10/28/20935984/getty-fire-mandatory-evacuations-map>