



## PACIFIC PALISADES COMMUNITY COUNCIL

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August 16, 2020

Via CA Legislature Submission Letter Portal

Hon. Lorena Gonzalez (AD 80)  
Chair, Assembly Local Government Committee

Hon. Frank Bigelow (AD 05)  
Vice-Chair, Assembly Local Government Committee

Hon. Rebecca Bauer-Kahan (AD 16), Richard Bloom (AD 50), Hon. Rob Bonta (AD 18), Hon. Ian C. Calderon (AD 57), Hon. Wendy Carillo (AD 51), Hon. Ed Chau (AD 49), Hon. Megan Dahle (AD 01), Hon. Tyler Diep (AD 72), Hon. Susan Talamantes Eggman (AD 13), Hon. Vince Fong (AD 34), Hon. Jesse Gabriel (AD 45), Hon. Eduardo Garcia (AD 56), Hon. Cottie Petrie-Norris (AD 74), Hon. Bill Quirk (AD 20), Hon. Robert Rivas (AD 20)  
Members, Assembly Local Government Committee

Re: Housing Density Bills in Assembly Appropriations Committee: SB 902 & 1120 (hearing August 18); OPPOSED (serious public safety issue/failure to include unconditional VHFHSZ exemption)

Dear Chair Gonzalez, Vice-Chair Bigelow and Members Bauer-Kahan, Bloom, Bonta, Calderon, Carillo, Chau, Dahle, Diep, Talamantes Eggman, Fong, Gabriel, Garcia, Petrie-Norris, Quirk and Rivas:

Pacific Palisades Community Council (PPCC) is the most broad-based organization in Pacific Palisades – a community within the City of Los Angeles, **entirely located in the Very High Fire Hazard Severity Zone (VHFHSZ)**. PPCC has been the voice of the Palisades community since 1973.

Attached below is the PPCC Policy Statement regarding the above-referenced housing density bills and public safety (originally submitted to the Senate Appropriations Committee). Our position is similar to that of the League of California Cities, which recently stated in a letter to the bills' author (Senate President pro Tempore Atkins) that in order to gain the League's support for SB 1120, the bill must be amended to **"prohibit developers from using SB 1120 in very high fire hazard zones."** See League of California Cities 8/5/20 Letter: <http://blob.capitoltrack.com/19blobs/00be30fa-1cbd-4143-a962-667313d5e6cb>.

We respectfully urge you to consider the **risk of harm to life and safety** posed by greater density in our VHFHSZ areas, as explained in our Policy Statement, and we accordingly request that the Appropriations Committee decline to move these bills forward unless each bill is amended to add an *unconditional exemption* for all parcels within VHFHSZ areas.

Thank you for your consideration and attention to this important matter of public safety.

Sincerely,

  
David Card, Chair  
Pacific Palisades Community Council

## Pacific Palisades Community Council

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cc: Hon. Richard Bloom, Assemblymember (AD 50)  
Hon. Sheila Kuehl, Supervisor (CSD 3)  
Hon. Mike Bonin, Councilmember (CD 11)

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Attached below: PPCC Policy Statement – Housing Density Bills and Public Safety

### PPCC Policy Statement – Housing Density Bills and Public Safety

This policy statement is made with reference to the package of housing bills now set for suspense hearing on June 18 in the State Senate Appropriations Committee, including SB 902, 1085, 1120 and 1385. It is also intended to apply to any future proposed legislation which may, directly or indirectly, seek to increase density in our low-density residential communities.

Taken together, these bills would erode local land use and zoning control and allow denser development in residential areas, either by streamlining CEQA and other approvals, allowing cities to bypass voter initiatives, and/or mandating or providing incentives for up-zoning to create more housing. *None of the bills contains an unconditional exemption for parcels located in the Very High Fire Hazard Severity Zone (VHFHSZ).* As a result, this proposed legislation presents a clear danger to public safety in VHFHSZ neighborhoods.

Pacific Palisades is a community of about 25,000 located in the wildland-urban interface in the foothills of the Santa Monica mountains within the City of Los Angeles. All of the Palisades is located in the VHFHSZ. We have only two primary routes of ingress and egress and many of our hillside streets are narrow and winding. The increased density called for by these bills will exacerbate crowded conditions on our roads and put lives and property at risk.

Pacific Palisades has experienced and will continue to face the serious threat of wildfires and resulting mandatory evacuations. The Los Angeles Fire Department advises that the brush-fire season is now year-round. Substantial wildfires have already taken place in Los Angeles County this year. Our residents were recently under mandatory evacuation orders during the dangerous 2019 Getty fire, and many were required to evacuate during the Palisades fire, also in 2019. During mandatory evacuations, swift access is needed for emergency vehicles as well as for the thousands of residents who are forced to flee their homes. Such access will be compromised by the increased density – more population – called for by the proposed bills.

Pacific Palisades Community Council (PPCC)<sup>1</sup> therefore urges the members of the Senate Appropriations Committee (and if the bills move forward to a floor vote, all other Senators) to oppose these bills unless they are amended to provide for a **clear, unconditional exemption** for VHFHSZ areas.<sup>2</sup>

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<sup>1</sup> Acting through its Executive Committee, pursuant to PPCC Bylaws Article V.3(B), as the full PPCC board has been unable to meet during the coronavirus pandemic: <http://pacpalicc.org>. This policy statement is fully consistent with past PPCC positions, including its opposition SB 50: <http://pacpalicc.org/wp-content/uploads/2020/01/LetterSenatorRulesSB50R.pdf>. See also our recent letter opposing SB 902: <http://pacpalicc.org/wp-content/uploads/2020/06/PPCC-EC-Letter-re-SB902Appropriations.pdf>.

<sup>2</sup> Two of the bills at this point contain no VHFHSZ exemption (SB 902 and 1085); two others (SB 1120 and 1385) either directly or indirectly reference a conditional exemption set forth in Government Code Section 65913.4(a)(6)(D). That section contains an “exception to the exception,” allowing streamlined land use approval for development within the VHFHSZ that complies with “fire hazard mitigation measures.” But even if a structure is built to be fire-resistant (*i.e.*, with fire hazard mitigation measures), a duplex or fourplex on a VHFHSZ parcel (which could also include *additional* dwelling units in the form of ADUs that are permitted *by right*) will still add density (more dwelling units, more people living there). This in turn means many more people will need to flee during wildfire evacuations (whether or not the structures themselves are fire-resistant), clogging our narrow streets and making already-difficult evacuations – not to mention the difficulty of getting fire equipment into the area – even more difficult, thus risking to an even greater degree than is already present the lives and safety of residents and firefighters alike. References to the conditional VHFHSZ exemption contained in Sec. 65913.4(a)(6)(D) should be stricken and replaced with an unconditional exemption.