



Pacific Palisades Community Council

October 12, 2023

Department of City Planning (*via email*):
Vincent P. Bertoni, Director of Planning
Cally Hardy, City Planner, Housing Policy

vince.bertoni@lacity.org
planning.housingpolicy@lacity.org

Re: Proposed Affordable Housing Streamlining Ordinance (AHSO) / CF 22-0623 – **Request VHFHSZ Exemption**

Dear Department of City Planning:

For fifty years, Pacific Palisades Community Council (PPCC) has been the voice of the community and the most broad-based organization in Pacific Palisades. Our entire community is located within the sensitive Very High Fire Hazard Severity Zone (VHFHSZ).

The proposed AHSO contains limited exemptions for certain sensitive areas (in single-family and Coastal zones) but does not include a VHFHSZ exemption. Several areas of Pacific Palisades (and other communities in the VHFHSZ) are not located in either of these two exempt zones, and thus would be subject to a streamlined approval process for affordable housing projects, with *no review of public safety impacts* in sensitive VHFHSZ areas.

Elimination of environmental and discretionary review in designated VHFHSZ areas is dangerous and unacceptable. Both PPCC and the Los Angeles City Council have recognized this fact by calling for an unconditional VHFHSZ exemption in proposed state housing legislation that would streamline approvals for housing development projects. In addition, the City's own approved Housing Element protects environmentally sensitive areas such as the VHFHSZ by excluding them from the Rezoning Program needed to meet RHNA numbers. Consistent with these positions and City policy, an **unconditional exemption for the VHFHSZ** should also be included in the proposed AHSO.

Los Angeles City Actions/Policy

The City Council has expressly recognized the danger to all of the City's VHFHSZ areas if adequate discretionary review is eliminated in the housing approval process. The Council recently called for an unconditional exemption for the VHFHSZ in proposed state legislation (SB 423) that would streamline certain affordable housing projects statewide (*see* Council File 23-0002-S71 – unanimously passed on 9/25/23 to include this position in the City's 2023-24 State Legislative program).

As explained in the CLA’s report in CF 23-0002-S71, an unconditional VHFHSZ exemption is necessary to allow for adequate environmental review and scrutiny for public safety concerns of proposed housing development in these sensitive areas. *Without a VHFHSZ exemption, the proposed AHSO is contrary to the CLA’s conclusion and the City Council’s express position on SB 423.*

Moreover, the approved 2021-2029 Housing Element (HE) *expressly protects VHFHSZ properties* by excluding them from the inventory of sites available for rezoning. As the HE explains: “Key elements of the rezoning strategy have been informed by public input and City Council direction. . . . In general, the program emphasizes increasing access to Higher Opportunity areas of the city, . . . while *protecting environmentally sensitive areas such as fire zones . . .*” HE, Chapter 4 (emphasis added). *Failure to exempt the VHFHSZ from the proposed AHSO would be clearly inconsistent with the HE’s protections.*

Substantial Risk to Public Safety

Failure to exempt the VHFHSZ would compromise public safety in Pacific Palisades and in other hillside communities in the VHFHSZ. Like many of our counterpart communities in the City, the Palisades is at constant risk of wildfires and required emergency evacuations. We have extremely limited means of egress and ingress (only two main roadways lead in and out of Pacific Palisades) and thousands of our residents reside on narrow hillside streets as well as substandard “flat” streets, where evacuation is already challenged. See: <https://pacpalicc.org/wp-content/uploads/2020/10/PPCC-LetterCF-20-1213-Motion-re-VHFHZ.pdf>. We have decades-long experience with destructive wildfires and frightening evacuations, including the massive 1978 Mandeville Fire, the 2018 Woolsey Fire, the 2019 Getty and Palisades Fires and the 2021 Palisades Fire.

These conditions result in serious risk to lives and public safety from crowded roadways during required emergency evacuations – which would be made even worse with additional density. Our community’s significant and legitimate concerns and considerations must be addressed with an adequate environmental review of any proposed affordable housing projects in the VHFHSZ.

Conclusion/Request

PPCC recognizes the need for affordable housing and does not seek to prevent affordable housing in appropriate areas of Pacific Palisades or in any other areas of the City. However, in the interest of public safety, it is imperative that any such proposed housing in the sensitive VHFHSZ must not be streamlined and must be subject to adequate environmental and discretionary review.

Consistent with the City Council’s position in CF 23-002-S71 and its request for an unconditional VHFHSZ exemption in SB 423, as well as with the protections afforded sites in the VHFHSZ by the HE, **we urge the Planning Dept. to include an unconditional VHFHSZ exemption in the draft of the proposed AHSO.**

This letter was recommended by the PPCC Land Use Committee and approved *unanimously* by the PPCC Board of Directors at the regularly-scheduled public PPCC meeting on October 12, 2023.

Thank you for your consideration.

Sincerely,
Maryam Zar
President, Pacific Palisades Community Council
Steve Cron and Christina Spitz
Co-Chairs, PPCC Land Use Committee

cc (via email):

Hon. Karen Bass, Mayor, City of Los Angeles

karen.bass@lacity.org

Hon. Traci Park, Councilwoman, CD 11

traci.park@lacity.org

Hon. Paul Krekorian, L.A. City Council President; Councilmember, CD 2

councilmember.krekorian@lacity.org

Hon. Katy Yaroslavsky, Councilwoman, CD 5

katy.yaroslavsky@lacity.org

Hon. Nithya Raman, Councilmember, CD 4

councilmember.raman@lacity.org

Lisa Webber, Deputy Director of Project Planning

lisa.webber@lacity.org

Arthi Varma, Deputy Director of Citywide Policy Planning

arthi.varman@lacity.org

Best,

Maryam Zar

PPCC President