

MEMORANDUM

TO: Pacific Palisades Community Council (PPCC)
FROM: Standing Homes Advisory Task Force, Palisades CRCC
RE: Standing Homes Advisory Task Force Comments on the Pacific Palisades Long-Term Recovery Plan (Draft, May 2026)
DATE: June 3, 2026

Introduction

The Standing Homes Advisory Task Force to the Palisades CRCC consists of residents whose homes “survived” the Palisades Fire i.e., remain standing that are in or adjacent to the burn zone. These comments address the Pacific Palisades Long-Term Recovery Plan (LTRP), released as a draft for public review in May 2026. The LTRP is described as “a strategic recovery plan for rebuilding Pacific Palisades following the Palisades Fire through the identification of short-, medium-, and long-term recovery projects.”

We write to document a significant and consequential gap in that plan: the near-total absence of any meaningful treatment of standing homes and the residents who occupy them. Given the absence of the both the phrase and concept of “standing homes” as a category of properties that have their own distinct issues and needs, this memorandum is longer than those of the other ATF’s. There is a Summary of our requests at the end of the document, but we implore the readers to take the time to read the entire document because while there have been successful remediations and re-occupancy of standing homes, there are so many owners of standing homes who are searching for answers and help who feel that their unique needs are not clearly understood or even recognized.

From the early days after the Palisades Fire, many residents whose homes were not destroyed have felt that their needs, concerns, and unique circumstances were being overlooked. The public narrative — and, as this letter documents, the City’s official planning framework — has consistently centered on those who lost their homes entirely. We do not diminish that loss. Losing one’s home is a profound and devastating experience, and the commitment to support full rebuilding is right, just and necessary.

But time and emerging evidence are demonstrating what standing home residents have known since January 2025: the issues facing homes that survived the fire are not minor inconveniences. They are complex, urgent, and in many cases unresolved. Homes that survived the fire do not necessarily equate to clean, safe, or habitable homes. The unique challenges of standing homes — toxic contamination, insurance disputes, remediation costs, and the absence of any clear standard for what “safe to occupy” means — are proving to be central elements of the community’s recovery. The LTRP generally ignores all this.

We request that the PPCC adopt these comments and submit them formally to the City as part of the public comment record on the LTRP. WUI fires are an increasingly unavoidable reality for Los Angeles and for California. We do not know where the next WUI fire will strike, but we know with

certainty that there will be more. The recommendations in this memo are grounded in the specific experience of Pacific Palisades, but their implications extend to every community in the City and the State that sits in or adjacent to a WUI zone. Adopting and enacting these recommendations will benefit not only standing home residents in Pacific Palisades today, but every community in the City and the State that will face this same invisible crisis in the future.

The Invisible Crisis of Contamination of Standing Homes

There are potentially thousands of homes in and adjacent to the Palisades burn zone that have been heavily contaminated by the fire — through smoke infiltration, ash and soot deposition, toxic particulate migration, and off-gassing from burned structures nearby.

California Senate Bill 1350, which went into effect on July 1, 2025, extends Cal/OSHA (Title 8) workplace safety and health protections to businesses that employ household domestic services workers, including housecleaning companies, homecare agencies, and residential landscaping companies. Moreover, homeowners who hire an unlicensed individual — rather than a licensed contractor — to perform remediation work may inadvertently create an employment relationship triggering Title 8 coverage of the homeowner as employer. Mold and fire remediation is explicitly listed as work that can trigger this classification where the worker is unlicensed. Homeowners should verify contractor licenses through the Contractors State License Board (CSLB) before any remediation work begins.

Unfortunately, the hazardous conditions that would be regulated under SB 1350 and Title 8 for workers in a commercial setting exist in the living spaces of standing homes — unregulated and unmonitored for the homeowners, children, family members, and pets who occupy them.

Pacific Palisades is located within a Wildland-Urban Interface (WUI) — a zone where human development meets or intermingles with natural vegetation. The LTRP correctly identifies the community as WUI and discusses this designation in the context of brush clearance, defensible space, and vegetation management. However, the LTRP uses the terms "WUI fire" and "wildfire" interchangeably throughout, and in doing so obscures a distinction that is critical to understanding the contamination crisis facing standing homes. A wildfire burns vegetation — grass, chaparral, trees. A WUI fire burns all of that, and also burns homes, vehicles, appliances, furniture, building materials, plastics, electronics, batteries, and the full inventory of modern residential life. The toxic output of a WUI fire is categorically different from and far more complex than that of a wildfire in open terrain. The smoke, ash, and particulate matter that infiltrated standing homes in Pacific Palisades were not products of burning vegetation — they were products of burning neighborhoods. That distinction should be named explicitly in the LTRP and should inform every aspect of the contamination response, from testing protocols to clearance standards to public health guidance.

The contaminants of concern are well-documented in the scientific literature on structural fire smoke and Wildland-Urban Interface (WUI) fire ash from residential neighborhoods. They include:

- Heavy metals — particularly lead (from paint, pipes, and electronics), arsenic, cadmium, chromium, manganese, cobalt, and nickel — released when pre-1980 construction

materials, modern electronics, and battery systems are burned and transported as fine particulate into adjacent structures. Cobalt and nickel are recognized human carcinogens; manganese causes neurological damage at elevated concentrations; all are present in the lithium-ion battery systems that were distributed throughout the Palisades burn zone in EVs, solar energy storage units, and consumer electronics.

- Asbestos — present in insulation, floor tiles, roofing materials, and textured coatings in many Palisades homes built before 1980. When neighboring structures burn, asbestos fibers become airborne and can settle into surviving homes. Re-suspension during cleaning or renovation is a documented exposure pathway.
- Dioxins and furans — toxic byproducts of incomplete combustion of chlorine-containing materials including PVC piping, vinyl flooring, treated wood, and other common building and consumer products. These are among the most carcinogenic compounds known and persist in dust and soft surfaces.
- Volatile organic compounds (VOCs) — including benzene, formaldehyde, acrolein, polycyclic aromatic hydrocarbons (PAHs), and others that off-gas from burned materials and infiltrate neighboring structures, where they can persist in carpets, upholstery, HVAC systems, and building materials.
- Lithium and lithium-ion battery combustion products — released from the burning of EV batteries, Tesla Powerwalls and similar residential energy storage systems, laptop and consumer device battery packs, and e-bikes. Battery fires produce not only lithium compounds but a toxic cocktail of cobalt, nickel, manganese, and fluorinated gases including hydrogen fluoride, which is acutely toxic to the respiratory system at very low concentrations. Pacific Palisades, with its high density of EVs, solar installations, and high-end consumer electronics, faced a battery combustion hazard significantly greater than in a typical residential fire. This is an emerging and poorly characterized hazard that the LTRP does not mention.
- Fine and ultrafine particulate matter — which penetrates deeply into lung tissue and has been shown to carry adsorbed toxicants into the bloodstream.

These are not hypothetical concerns. Blood lead testing has already been incorporated into the LA County Department of Public Health’s Post-Fire Environmental Data Dashboard — an implicit acknowledgment that heavy metal exposure in the community is a real and measurable problem. Yet the LTRP contains no discussion of asbestos, dioxins, furans, lithium compounds, cobalt, nickel, manganese, hydrogen fluoride, or specific VOC classes anywhere in its 230+ pages of recovery strategy.

How the LTRP Treats Standing Homes

The Term “Standing Home(s)” Appears Zero Times in the Recovery Plan Body

The phrase “standing home” or “standing homes” does not appear anywhere in the body of the Pacific Palisades LTRP. The term appears only in Appendix B — the community survey results — as a response category. It appears a total of four times in the entire document, all in the appendix:

- “Living in my Palisades home (standing)” — a housing status survey option

- “Not living in my Palisades home (home standing but displaced)” — a housing status survey option
- “Living in standing home” — a return status survey option
- “Remediating a standing home” — a return status category

The City collected survey responses acknowledging that residents are remediating standing homes. That finding was not carried forward into any project, program, funding commitment, or policy recommendation anywhere in the plan’s 230+ pages. The survey data was collected; its implications were not acted upon.

The Only Quantitative Reference to Standing Structures Is About Restoring Power

The sole quantified reference to standing structures in the main LTRP text appears in the Infrastructure section (RSF 5), noting that LADWP restored electric service to “4,018 No Damage structures” by April 10, 2025. This is the City’s own count of homes that survived the fire. Restoring power to these homes is treated as the end of the City’s obligation to them. What was inside those homes after the fire — and who was breathing that indoor air — is not addressed.

The “No Damage,” “Affected (1–9% damage),” and “Minor (10–25% damage)” classifications used here derive from CAL FIRE’s DINS inspection protocol, which primarily assesses external structural damage only as were visible and. It was not designed to assess, and does not reflect, internal contamination from smoke infiltration, ash deposition, or toxic particulate migration, or conditions visible only in backyards and interior spaces. The LTRP adopts this classification without qualification or caveat — implicitly treating “No Damage,” “Affected,” or “Minor” as synonymous with “safe to occupy.” That equivalence is not supported by the evidence. Unfortunately, the LA County Assessor used DINS classifications to adjust property tax assessments — meaning standing homes in the “No Damage,” “Affected,” or “Minor” categories received little or no downward adjustment, despite incurring smoke contamination, toxic infiltration, and the diminished value of a home surrounded by a devastated neighborhood. LADBS is also relying on DINS data in its permitting and inspection framework, compounding the risk that contaminated homes move through official processes without scrutiny. The LTRP should not rely on DINS classifications as a proxy for occupancy safety. The actual universe of standing homes is therefore larger than the 4,018 “No Damage” figure the LTRP cites — encompassing all homes that survived with less than 50% structural damage, including those in the Affected and Minor categories, whose contamination risks are equally serious and whose needs are not addressed in the plan.

Specific Gaps the LTRP Must Address

1. No Remediation Standards or Clearance Criteria

The LTRP contains no discussion of what constitutes adequate remediation of a standing home contaminated by WUI fire smoke and ash. Missing entirely is any acknowledgment of pyrolysis — the thermal degradation of building materials caused by intense heat exposure, even when that heat does not ignite the structure. Standing homes in close proximity to burning structures are

subjected to radiant and convective heat sufficient to chemically and physically alter common building materials without producing visible char or flame damage. Stucco loses moisture and begins to calcify, reducing its adhesion and weather resistance. Concrete and masonry undergo microcracking and spalling as bound water converts to steam and aggregate expands differentially. Aluminum window frames soften and deform at temperatures well below ignition point, compromising seals and structural continuity. Roofing materials — asphalt shingles, underlayment, and flashing — off-gas volatile compounds and lose dimensional stability under sustained radiant heat. Wood studs and framing members experience surface carbonization and internal moisture loss that reduces their load-bearing capacity, sometimes without any visible surface evidence. None of this is detectable by the DINS exterior inspection protocol. None of it triggers a damage classification. And none of it is addressed anywhere in the LTRP. The result is that a home can pass every official assessment, look intact from the street, and still have structurally compromised framing, failed weatherproofing, and thermally degraded building envelope components that will not perform as designed in the next fire, the next rainstorm, or the next seismic event. Homeowners should be made aware that pyrolysis-related structural compromise is a real and documentable risk that DINS classifications cannot detect or rule out. The City should make licensed structural engineering assessments available and funded for standing homeowners who request them. There are no:

- Testing protocols to establish pre-remediation baseline contamination levels
- Clearance standards specifying what contaminant levels must be achieved before a home is considered safe for full-time occupancy
- Certification requirements identifying who has the authority to declare a home safely remediated
- Minimum remediation scope requirements (e.g., HVAC cleaning, duct replacement, soft surface assessment and, where indicated, mandatory replacement rather than cleaning) — recognizing that peer-reviewed science and EPA post-fire guidance establish that many heavy metals, dioxins, furans, PAHs, and fine particulate matter cannot be adequately remediated from soft and porous materials including carpets, upholstery, mattresses, drapes, foam padding, clothing and unsealed wood surfaces. For these materials, the scientifically supported protocol is disposal and replacement, not decontamination. Insurers routinely resist paying for soft goods replacement on the grounds that cleaning is sufficient; the City should take a formal position that this resistance is inconsistent with the science and advocate accordingly.
- Guidance on the circumstances under which remediation is insufficient and more extensive intervention is required
- Availability of funded structural engineering assessments for pyrolysis damage for standing homeowners who request them, recognizing that thermal degradation of stucco, masonry, window systems, roofing assemblies, and structural framing is not detectable by exterior visual inspection and is not captured by DINS classifications.

The question of what adequate remediation actually requires has been answered more honestly by the private sector than by the City. Rick Caruso's approach to Palisades Village has become a reference point, the gold standard, for the community's understanding of what pre-fire preparedness, response to the fire and serious post-WUI fire remediation looks like. And while

there is no singular approach because the conditions of every property is unique, in the case of remediation of the Palisades Village, rather than surface cleaning or selective replacement, Caruso took the entire structure down to the studs — a frank acknowledgment that WUI fire smoke, ash, and toxic infiltration penetrate so deeply into a structure that anything less cannot be confidently declared safe. We recognize that every property is different, that proximity to destroyed structures, construction type, HVAC configuration, and occupancy patterns all affect the level of contamination a standing home experienced, and that some homeowners who have tested and remediated are satisfied with the results. But satisfaction with a process that has no uniform standard, no independent verification requirement, and no established benchmarks for the full range of contaminants present in a WUI fire is not the same as confidence that the home is safe. This is precisely what many standing homeowners have concluded about their own properties: that the true cost of making their home safe approaches or exceeds the cost of starting from the ground up. If one of Los Angeles's most sophisticated developers, with unlimited resources and access to the best environmental counsel available, concluded that going to the studs was the right answer for a mixed use commercial/residential property in the Palisades, the insurance companies cannot credibly tell the families living next door that a surface wipe-down and an air purifier are sufficient.

Without these standards, homeowners attempting to remediate their properties have no benchmark to meet, no certification to obtain, and no legal protection if they return to a home that was inadequately cleaned. The City has established remediation and clearance processes for school properties through LAUSD. No equivalent guidance exists for private standing homes.

2. No Indoor Air Quality Testing Program for Residences

LAUSD conducted professional industrial hygienist assessments and ongoing air quality monitoring before students returned to Marquez Elementary and Palisades Charter High School. The same rigor has not been applied to private homes. The LTRP's environmental response for residential properties consists entirely of a publicly accessible data dashboard (LACDPH's PostFire Environmental Data Dashboard) that provides community-wide aggregate data — useful for policy, but not a substitute for individualized assessment of a specific home with its particular construction, HVAC system, and proximity to burned structures. The school model should be the floor, not the ceiling. Air quality monitoring standards should be updated to reflect the contaminants found in standing homes, including monitoring for PM1.0 rather than PM2.5, as ultrafine particles are the primary vector for many of the toxicants identified above.

3. No Specific Asbestos, Dioxin, VOC, or Lithium Framework

The word “asbestos” does not appear in the LTRP. The words “lithium” “dioxin” and “furan” do not appear. No specific VOC classes are named. The document references “fire-related toxins” once, in a community feedback summary, and lists it as a concern to be addressed through the environmental dashboard. This omission is particularly significant for Pacific Palisades, where a large share of the housing stock predates 1980 and therefore may contain lead paint and asbestos-containing materials, and where the density of EVs, solar storage systems, and lithium-ion devices in the burn zone makes lithium contamination a distinctive and uncharacterized local risk.

4. The Home Hardening Program Does Not Address Existing Contamination, Utility Code Compliance or Financial Barriers

The LTRP’s primary project for standing homes in the burn scar is the Home Hardening Residential Retrofit Project (RSF 4), which provides rebates for ignition-resistant construction improvements. This is a forward-looking program. It addresses nothing about the contamination those homes may already carry from the Palisades Fire.

Beyond the contamination gap, the program fails standing homeowners on a second front: financial access. Many residents — particularly seniors and fixed-income households — cannot afford mandated or strongly encouraged retrofits. Yet if they do not make these improvements, insurers may cancel their policies or raise premiums to unaffordable levels, forcing them out of homes they cannot replace while also potentially affecting the insurability of their neighbors. The City should establish a grant program — not merely a rebate, which requires upfront capital many do not have — specifically for low-income and senior standing homeowners to fund WUI fire-hardening retrofits including repair, relocating or upgrading utilities for code compliance. Furthermore, the LTRP should explicitly state that standing homeowners undertaking required retrofits are entitled to the same permit fee waivers available to those rebuilding from total loss. The City is currently considering blanket permit fee waivers for destroyed properties while the current approach is for standing home waivers to be handled case-by-case. That disparity is arbitrary and should be corrected.

Additionally, many standing homeowners who have assessed the true cost of adequate remediation — stripping walls to the studs, replacing HVAC and plumbing systems, professional decontamination — have concluded the total cost approaches or exceeds the cost of rebuilding from the ground up. These homeowners should be afforded all of the financial benefits, incentives, and reconstruction programs available to those rebuilding from total loss.

5. Insurance Issues Specific to Standing Homes Are Not Addressed

The LTRP’s insurance section (RSF 4) is written entirely from the perspective of homeowners rebuilding from total loss. It does not address the distinct situation facing standing homeowners, which includes:

- Insurer disputes about whether smoke and soot damage constitutes a covered loss under the policy language, particularly when the home is structurally intact
- Insurer disputes about whether thermal damage (pyrolysis) occurred, particularly when the home appears structurally intact
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- Disputes about the scope of required remediation and whether the insurer is obligated to fund it
- Disagreements about the cost of replacing contaminated soft goods, HVAC systems, roofs and other components that may not show visible damage
- Termination of Additional Living Expense (ALE) coverage before remediation is complete, forcing residents to return to homes that have not been adequately assessed or cleared — a consequence of the absence of any City-established remediation standard against which ALE termination decisions can be measured or challenged.

- Non-renewal and cancellation of coverage for standing homes in the burn zone, based on elevated risk profiles
- The absence of any state-mandated standard for smoke damage assessment, which leaves homeowners without leverage in coverage disputes
- Refusal by insurers to pay for environmental testing — including pre-remediation baseline testing, industrial hygienist assessments, and post-remediation clearance testing — even when such testing is necessary to document the scope of covered damage or to confirm that remediation obligations have been met. Insurers should be required to cover reasonable and necessary environmental testing when requested by the insured in connection with a covered loss, including clearance testing following insurer-approved remediation work.

The proposed Insurance Education Project focuses on general materials and acknowledges the City cannot recommend specific vendors. This is insufficient for standing homeowners navigating active, adversarial coverage disputes over complex contamination claims. The LTRP should include a specific insurance advocacy component, with coordination between the City, the California Department of Insurance, and organizations such as United Policyholders. The PPCC should additionally advocate for state legislation that codifies key protections for standing homeowners, including: (1) a requirement that insurers cover reasonable environmental and thermal testing costs when requested by an insured in connection with a covered loss; (2) a prohibition on insurers terminating ALE coverage where a City-recognized remediation standard has not been independently certified as met; (3) a requirement that post-WUI fire smoke and contamination damage be assessed using standardized protocols rather than insurer-selected methodologies; and (4) extended notice and cure periods before non-renewal or cancellation of policies for standing homes in declared disaster zones. Existing California law provides a partial foundation for these protections. SB 872 (Dodd, 2020) established that ALE coverage applies when a home is uninhabitable due to a covered peril — not only when it is physically damaged — and requires a minimum four-month advance ALE payment without an itemized claim and at least 24 months of total ALE coverage after a declared emergency. AB 3012 (2020) requires insurers to advance 30% of personal property limits without an itemized claim. In January 2025, Insurance Commissioner Lara issued a bulletin specifically directed at Palisades and Eaton fire survivors urging insurers to maintain ALE for homes that remain uninhabitable due to contamination, even where no physical structural damage is present — an acknowledgment that the existing statutory framework does not adequately address the standing home contamination scenario.

Two bills currently moving through the California Legislature address these gaps directly. AB 1642 (Harabedian) — the Wildfire Environmental Safety and Testing Act — would require the Department of Toxic Substances Control to develop standards for testing and remediation of lead, asbestos, heavy metals, cyanide, lithium, manganese, PAHs, and VOCs in wildfire-affected homes, mandate both pre- and post-remediation testing, and establish where samples must be collected inside a home. AB 1795 (Gipson) — the Smoke Damage Recovery Act, backed by Insurance Commissioner Lara — would require insurers to inspect homes within 30 days of a claim, pay for testing, and cover homeowners' living expenses until the home is deemed safe. Both bills passed the Assembly Appropriations Committee in May 2026 and are actively moving through the Legislature. The PPCC should formally support both bills and advocate for their passage without the sublimits the insurance industry is seeking to insert.

6. Standing Multifamily Buildings and Condominiums Are Entirely Ignored

The LTRP's treatment of standing homes is entirely silent on standing multifamily residential buildings and condominiums. These structures present compounded challenges and their expeditious rebuild is essential to the long-term recovery of the community. A single contaminated building may house dozens of households, including renters who have no contractual right to compel their landlord to test or remediate. Condominium associations present a governance challenge: individual unit owners may wish to act, but the HOA controls access to shared HVAC systems, hallways, and building envelopes. The LTRP contains no framework for resolving these conflicts, no guidance on unit owner rights, and no supplemental regulatory guidance for HOA governing documents not designed for post-WUI fire contamination scenarios. To address the unique needs of standing condominiums, townhouse and multifamily residential the following recommendations should be included in the LTRP:

- **Mandatory Joint Insurance Mediation:** Force HOA Master Policy and individual HO6 insurers into immediate joint mediation. This stops carrier finger-pointing over "inside vs. outside" walls and unfreezes stalled toxic claims.
- **Upfront Testing Grants & Bridge Loans:** Provide HOAs immediate City grants for independent building-wide toxic testing, plus zero-interest bridge loans to cover massive deductibles so remediation can start without delay.
- **Seniors & Low-Income Owners:** Provide City emergency funds to senior or low-income owners facing HOA special assessments that exceed their policy limits.
- **Automatic ALE Housing Extensions:** Mandate that individual temporary housing (ALE) coverage cannot be cut off if an individual's unit is clean but the building's shared infrastructure (central HVAC, shared walls, plumbing) remains toxic.
- **Emergency HOA "Safe Harbor" Powers:** Advocate for emergency state legislation allowing HOA boards to bypass slow community votes to instantly pass emergency repair funds and enforce a "Right of Entry" to test and clear abandoned or uncooperative units.
- **Permit Fee Waivers & Assessment Relief:** Grant multi-unit owners the same blanket permit fee waivers as total-loss rebuilds.
- **Mandate, on a going forward basis, that HOAs and property managers review the adequacy of their fire insurance coverage annually**

7. LADWP's Own Bulletin Recommends Full Interior Plumbing Replacement — The LTRP Is Silent

LADWP has issued a bulletin recommending that all interior plumbing in standing homes be replaced following the Palisades Fire — reflecting LADWP's own assessment that fire conditions, including extreme heat, pressure fluctuations during firefighting, and potential contaminant infiltration into supply lines, compromised interior plumbing systems even in structurally intact homes. This is an extraordinary acknowledgment from the City's own utility. Full interior plumbing replacement in a single-family home can cost \$15,000 to \$50,000 or more. The LTRP does not mention this bulletin, does not address the cost or logistics of plumbing replacement for standing homeowners, and contains no program to help homeowners comply.

8. Mental Health Burden Specific to Standing Home Occupants Is Not Addressed

There is a category of mental health burden specific to standing home residents that the LTRP does not acknowledge. Unlike displaced residents — whose trauma is centered on loss and uncertainty of return — standing home occupants face ongoing daily exposure anxiety, hypervigilance about symptoms in children and themselves, guilt and self-doubt about the decision to stay or about the fact that their home survived when so many others did not, and the exhaustion of navigating remediation without institutional support. The LTRP’s mental health programming is designed for displaced residents processing loss. It does not address this distinct and persistent psychological burden. The City should recognize standing home occupants as a distinct mental health population and the LTRP should include programming designed specifically for them.

9. No Consumer Protection Against Predatory Remediation Contractors

The absence of any City-established remediation standards creates a market for predatory contractors. Homeowners who are frightened and operating without guidance are documented targets for contractors who charge premium prices for superficial cleaning, use proprietary treatments with no documented efficacy, or perform inadequate work and move on. Without a clearance standard, a homeowner cannot know whether the money they spent actually made their home safer. The LTRP should include a consumer protection component: a City-vetted contractor registry or qualification standard, required contract elements, and a complaint pathway. Absent City standards for what remediation must accomplish, homeowners have no basis on which to evaluate contractor claims.

10. Children Living in Standing Homes Are a High-Risk Population the LTRP Does Not Protect

The LTRP’s school-focused environmental protections reflect an appropriate recognition that children face heightened risk from post-fire contaminants. Lead, VOCs, dioxins, lithium compounds, and fine particulate matter cause disproportionate developmental harm in children, with effects on neurological development, respiratory function, and immune maturation that can be permanent. Yet the LTRP applies this heightened standard only to school buildings. A child attending a tested and cleared school may return each afternoon to a home that has never been assessed or properly remediated. The LTRP should designate children in standing homes as a priority population for exposure assessment, blood, urine and hair lead and heavy metals screening, and neurodevelopmental monitoring.

11. Renters in Standing Buildings Have No Enforceable Protections Under the LTRP

Renters in standing buildings face compounded vulnerability: no ownership stake in the remediation decision, no explicit lease-based right to demand environmental testing, and no retaliation protection for requesting it. A renter in a standing apartment in the burn zone may be entirely unaware that LADWP has recommended full plumbing replacement or that their HVAC may be distributing contaminated air. The LTRP should include explicit tenant protections: a right to know whether their building has been tested, protection against retaliation, and a prohibition on re-renting unremediated units without documented remediation and post-remediation clearance

testing results. A complaint and enforcement pathway through the City's housing departments is essential.

12. Medical and Emergency Management Facility

Because of the volume of high-risk construction and the isolation of many homeowners and renters that have returned the community needs a temporary Medical and Emergency Management Facility. Perhaps as the commercial areas get rebuilt the City can provide an incentive for a permanent urgent care facility in Pacific Palisades.

13. Public Safety and Security

Securing standing homes was a concern from the moment the fires were extinguished. Now, as rebuilding is well underway and more residents are returning, there is a documented and growing pattern of theft at construction sites and home invasions across Pacific Palisades. The community has thus far avoided serious physical confrontations, but neighborhoods without functioning streetlights and with limited police presence are predictably vulnerable, and there is no basis for confidence that this will continue. The fundamental obligation of government is to keep its residents safe. That obligation cannot be transferred to residents, who should not be left to hire private security to protect themselves in their own neighborhood. The LTRP should address the public safety needs of a community in active recovery, with adequate and sustained LAPD presence commensurate with the risks.

Seniors and Residents on Fixed Incomes

The LTRP contains meaningful programming for older adults, including a proposed Multipurpose Senior Center (RSF 3), recovery navigation support for seniors and caregivers, and a United to House LA Emergency Income Support Program targeting very low-income households with seniors or persons with disabilities at risk of homelessness. These are valuable. They do not, however, address the specific and acute vulnerabilities of seniors, fixed-income and under insured residents living in standing homes in the burn zone.

These residents face a convergence of risks that the LTRP does not acknowledge as a distinct category:

- **Financial capacity:** Proper remediation of smoke and toxin damage can cost tens of thousands of dollars — HVAC replacement, duct cleaning, professional decontamination, testing and re-testing. For residents on fixed incomes or with limited insurance coverage, these costs are prohibitive. The LTRP contains no grant, loan, or subsidy program for standing home remediation.
- **Health vulnerability:** Older adults and individuals with pre-existing respiratory, cardiovascular, or immune-compromised conditions face disproportionate health risks from the contaminants associated with WUI fire smoke and structural fire ash. The biological effects of lead, dioxins, lithium compounds, and VOCs are documented to be more severe in older populations.
- **Mobility and access barriers:** Identifying and navigating remediation resources — finding qualified contractors, understanding testing requirements, filing insurance claims, applying for assistance — requires significant time, digital literacy, and physical mobility. Many seniors lack one or more of these.

- Social isolation: Seniors living alone in standing homes in a largely depopulated burn zone face documented mental health risks from isolation, compounded by the ongoing physical hazards of their environment.

The LTRP should include a dedicated program for low-income, senior and under insured standing homeowners providing subsidized or grant-funded remediation assistance, priority access to individualized indoor air quality assessments, case management to navigate insurance claims and remediation contractors, and connection to health monitoring resources.

Health Monitoring for Returning Residents

The LTRP does not include any program for monitoring the health of residents who have returned to or remained in standing homes in the burn zone. Health monitoring serves two essential functions:

- Individual health protection: Systematic biomonitoring — including blood and urine lead and heavy metals testing, hair testing, pulmonary function assessments, and screening for VOC, lithium, and heavy metal exposure — allows individual residents and their physicians to identify exposure-related health changes early, before they become irreversible. Blood lead and hair testing is already occurring in the community, but it is not organized as a longitudinal monitoring program with clinical follow-up for individuals who test positive.
- Understanding remediation effectiveness: No rigorous data currently exists on whether remediation protocols being used in Pacific Palisades standing homes are actually reducing exposure. Health monitoring linked to remediation timelines would generate the evidence base needed to improve standards and protect future disaster survivors.

Hair analysis for heavy metal biomonitoring is already being pursued by some Pacific Palisades residents independently, at personal expense — a direct consequence of the absence of a Citysupported program. A structured biomonitoring program should incorporate hair, blood, and urine testing as clinically appropriate, offered through accessible community health settings. The LTRP misses an opportunity to partner with UCLA, USC, or other national or regional academic institutions already named as partners in the LACDPH dashboard initiative to establish a community health cohort study tracking standing home occupants over time. Such a study would serve Pacific Palisades residents directly and produce knowledge of national significance for future disaster response.

Data-Driven Standards, Not Individual Choices, Must Define Public Health Policy

We recognize that some residents with standing homes do not want testing, do not want to know their contamination levels, and prefer to proceed with their lives without engaging with these questions. Some residents have taken meaningful steps — remediating for heavy metals and asbestos, obtaining Industrial Hygienist clearance letters, and installing whole-house air filtration systems — and are satisfied that they have done what is reasonable given the information available to them. We understand and respect individual choices made in good faith. Some reflect genuine risk tolerance. Some reflect grief and exhaustion after a traumatic event. Some reflect concern that

documented contamination will affect property values, insurance renewal, or the ability to sell. And some reflect a sincere belief that the hazard profile described in this memo does not apply to their specific home and confidence in their remediation contractors and Industrial Hygienists. The extent to which remediation contractors and Industrial Hygienists are getting it right, particularly in homes with significant documented baseline toxicants, should be studied and the findings disseminated to the standing homes community for reference.

Those individual choices deserve respect. They do not, however, constitute a basis for institutional policy, and several important qualifications must be stated plainly. There are currently no established residential exposure standards for dioxins, furans, most VOCs, cobalt, nickel, manganese, other smoke borne toxic heavy metals or hydrogen fluoride residues in homes — meaning that an IH clearance letter for lead and asbestos, while meaningful, says nothing about those hazard classes. The quality of IH protocols, sampling methodology, and reporting is highly variable across practitioners, and clearance testing results are susceptible to manipulation through sampling location, timing, and testing scope. Many residents who have returned to standing homes have done so without baseline testing, without clearance testing, or both — meaning there is no documented record of what their home contained before remediation or whether the remediation was effective. Each home is different, and it is genuinely difficult in many cases to understand why some homes were more heavily affected than others, just as it remains difficult to understand why some homes burned and others did not. Reports from Altadena following the Eaton Fire, where residents documented persistent elevated lead levels after professional remediation and IH clearance, underscore why this matters: if remediation is being declared complete when hazardous contaminant levels remain, the clearance process is not working. The residents who have concerns should not be silenced or dismissed by those who have chosen differently, and the absence of uniform standards means no individual clearance process can be fully validated against an objective benchmark. The City's obligation is to establish those benchmarks — not to leave residents to navigate an unregulated landscape and then treat their navigation choices as evidence that standards are unnecessary.

But the City of Los Angeles cannot adopt those individual preferences as its institutional policy. A recovery plan that omits contamination standards, remediation benchmarks, and health monitoring because some residents prefer not to engage is not a public health plan — it is an abdication of the City's duty of care.

The responsible approach is not to compel testing or remediation, but to make rigorous assessment resources freely available; establish clear standards so those who engage know what they are working toward; ensure those who choose not to test are doing so with full knowledge of the risks — not because the City withheld information; and protect future residents, including renters, buyers, children and pets, who may occupy these homes without knowing their history.

There is also a disclosure dimension the LTRP does not address. California's real estate disclosure law requires sellers to disclose known material defects, meaning sellers who are aware of contamination, or who have reason to know of it given the home's location in the burn zone, may have disclosure obligations when the property is sold or rented. The compounding effect of inaccurate DINS-based tax assessments, no remediation certification standard, and no required contamination disclosure protocol means that contaminated standing homes can currently be sold or rented to unknowing buyers and tenants. The LTRP should address this through required

disclosure guidance, a voluntary certification program for remediated properties, and coordination with the California Association of Realtors and the Department of Real Estate on post-WUI fire transaction standards.

As a corollary, standing homeowners also face a significant and underacknowledged financial harm that compounds every other challenge they face: the perception of toxicity — regardless of whether their specific home has been tested or remediated — is depressing property values across the burn zone. Homes that have been professionally remediated and cleared are being discounted in a market already under pressure from other consequences of the fire, including the loss of commercial and retail services, ongoing construction impacts, security concerns, and insurance availability, alongside homes that have never been tested, because buyers, tenants, lenders, and appraisers cannot distinguish between them in the absence of any City-recognized remediation certification or disclosure standard. This is not an argument for suppressing information about contamination risks — it is an argument for the City to move urgently to establish the credible, validated standards and certification process that would allow remediated homes to be recognized and valued accordingly. Transparency and rigorous standards are the solution to stigma, not silence.

Summary of Requested Actions

The Standing Homes Advisory Task Force respectfully requests that the PPCC adopt these comments and formally submit them to the City as part of the public record on the LTRP. WUI fires are an increasingly unavoidable reality for Los Angeles and for California. We do not know where the next WUI fire will strike, but we know with certainty that there will be more. The recommendations in this memo are grounded in the specific experience of Pacific Palisades, but their implications extend to every community in the City and the State that sits in or adjacent to a WUI zone. Adopting and enacting these recommendations will benefit not only standing home residents in Pacific Palisades today, but every community that will face this same invisible crisis in the future. Specifically, we request the City revise the LTRP to include the following:

Immediate Additions to the Plan

- A dedicated Standing Homes Recovery section within RSF 3 (Health and Social Services) and RSF 4 (Housing), explicitly naming standing home remediation as a distinct recovery challenge.
- A funded Post-Fire Residential Contamination Assessment Program providing individualized indoor air quality and surface contamination testing for standing homeowners who request it, modeled on the LAUSD school assessment protocol.
- A comprehensive survey of peer-reviewed studies from prior WUI fires examining the persistence and long-term health effects of fire-related hazard classes in affected communities, and a longitudinal public health study of communities that experienced WUI fires twenty or more years ago — including the Oakland Hills Fire (1991), the Cedar Fire (2003), and the Tubbs Fire (2017) — to determine whether wide-ranging health effects have manifested over time in residents of standing homes. Pacific Palisades should not wait twenty years to ask these questions. The data from prior events exists and should be analyzed now to inform the current recovery keeping in mind that conditions in the

Palisades Fire, are significantly different with the prevalence of electric vehicles and power walls and what may have been tested and studied may be limited.

- Identify, study, and disseminate best practices from remediation contractors and Industrial Hygienists who are achieving documented success in homes with significant baseline contamination — creating a publicly available resource for standing homeowners, their insurers, and the contractors they hire. Where remediation protocols are demonstrably working, particularly in heavily contaminated homes, those protocols should be validated, published, and made accessible to the entire standing homes community so that effective approaches are replicated and ineffective or predatory ones are identified and discouraged.
- A protocol distinguishing external structural damage assessments (DINS classifications) from internal contamination risk, with guidance to homeowners about what “No Damage,” “Affected (1–9%),” or “Minor (10–25%)” does and does not mean.
- A revised damage assessment methodology that moves beyond DINS classifications to incorporate input from property owners’ industrial hygienists or structural engineers, with the City updating damage assessments accordingly to reflect actual conditions, including for purposes of property tax assessment. Immediate financial assistance for seniors and fixed-income standing homeowners who face the simultaneous costs of remediation, coderequired repairs, and wildfire-hardening retrofits — recognizing that these needs are not sequential but concurrent, and that the absence of a combined assistance program forces vulnerable homeowners to choose between making their home safe to occupy, making it insurable, and making it resilient against the next fire. A dedicated grant program — not a rebate or loan requiring upfront capital — should be available immediately, without waiting for FEMA HMGP approval timelines of 12-18 months, for homeowners who cannot absorb these overlapping costs.
- Availability of funded pyrolysis structural assessments for standing homeowners who request them, with a requirement that insurers cover such assessments when requested in connection with a covered loss, and training for City building inspectors to identify pyrolysis indicators during permitted renovation and hardening work inspections.
- A dedicated recovery framework for standing multifamily residential buildings and condominiums, addressing HOA governance gaps including emergency legislation enabling boards to authorize immediate repair funds and enforce right-of-entry for testing and remediation; mandatory joint mediation between HOA master policy insurers and individual HO-6 carriers to resolve coverage disputes; City grants for building-wide independent toxic testing and zero-interest bridge loans to cover HOA deductibles; emergency funds for senior and low-income unit owners facing special assessments that exceed their policy limits; and blanket permit fee waivers equivalent to those provided for total-loss rebuilds.
- Explicit protections for renters and unit occupants in standing multifamily buildings, including: a right to know whether their building and unit has been tested; protection against retaliation for requesting testing; a prohibition on re-renting unremediated units without documented remediation; and a mandate that individual ALE coverage cannot be terminated where shared building infrastructure — including central HVAC, shared walls, and common plumbing — remains contaminated.
- Designation of children in standing homes as a priority population for exposure assessment, blood lead screening, and neurodevelopmental monitoring.

- Mandatory acknowledgment of LADWP’s bulletin recommending full interior plumbing replacement in standing homes, with a funded assistance program for homeowners who cannot afford compliance.
- Establish a temporary Medical and Emergency Management Facility in Pacific Palisades to serve the elevated health and safety needs of an active recovery zone, with incentives for a permanent urgent care facility as commercial areas are rebuilt.
- Commit to adequate and sustained LAPD presence in Pacific Palisades commensurate with the documented increase in property crime and the vulnerability of a neighborhood with limited lighting and a dispersed, returning population.

Standards and Criteria

- Establishment of minimum testing, remediation standards and clearance criteria for standing homes in the burn zone, developed in collaboration with LACDPH, Cal/OSHA, AQMD, and academic partners, specifying testing protocols, acceptable post-remediation contaminant levels, and certification requirements and updated air monitoring standards.
- A City policy establishing that standing homeowners undertaking required or recommended WUI fire-hardening retrofits receive the same permit fee waivers and expedited permitting available to those rebuilding from total loss, eliminating the current case-by-case disparity.
- A City-vetted contractor qualification standard and registry for standing home remediation, with required contract elements and a complaint and enforcement pathway.
- Fund acquisition of community air monitoring and testing equipment and provide certification training for community members in its use, enabling ongoing independent, ready available and timely environmental monitoring.
- A single coordinated application process allowing standing homeowners to apply simultaneously for remediation assistance, code compliance support, and wildfirehardening grants rather than navigating separate programs with separate eligibility requirements, separate timelines, and separate funding sources.

Support for Seniors and Fixed-Income Standing Homeowners

- Dedicated grant programs — not merely rebates or loans, which require upfront capital many fixed-income residents do not have — for low-income and senior standing homeowners covering: (a) remediation costs that exceed insurance coverage or where claims are disputed or denied, and (b) WUI fire-hardening retrofits and utility repairs, relocations, and code compliance upgrades, ensuring they can maintain insurable, fireresilient homes without being forced to sell or relocate.
- Priority access to case management, remediation navigation, and individualized health assessments for seniors and disabled residents in standing homes.
- Parity of all financial benefits, incentives, permit fee waivers, and reconstruction programs for standing homeowners whose remediation costs approach or exceed the cost of full demolition and rebuild.

Health Monitoring

- A structured, longitudinal health monitoring program for residents of standing homes in the burn zone, including baseline biomonitoring and follow-up at defined intervals.
- A research partnership with regional academic institutions to evaluate the health impacts of different remediation approaches.
- Inclusion of hair, blood, and urine testing options in the biomonitoring program, accessible through community health settings rather than requiring private clinical referrals at personal expense.

Insurance

- An insurance advocacy component within the LTRP specifically addressing coverage disputes related to smoke damage, soot contamination, and toxic infiltration in structurally intact homes — separate from the general insurance education project currently proposed.
- Coordination with the California Department of Insurance to explore whether standardized post-WUI fire smoke damage assessment protocols can reduce the adversarial claims environment standing homeowners currently face.
- Advocacy for extension of ALE coverage where City-established remediation standards have not been met, and a prohibition on insurers terminating ALE on the basis of remediation completion where no independent clearance certification has been issued. Formal PPCC support for AB 1642 (Wildfire Environmental Safety and Testing Act) and AB 1795 (Smoke Damage Recovery Act), and advocacy for their passage without the sublimits the insurance industry is seeking to insert.

Conclusion

Pacific Palisades is not recovering only through rebuilding. It is also recovering through the return of families to homes that survived the fire — homes that carry within them an invisible legacy of what burned around them. Those families deserve the same rigor, the same resources, and the same sense of urgency that the City has appropriately directed toward the rebuilding of destroyed properties.

The Pacific Palisades Long-Term Recovery Plan, as currently drafted, does not meet that standard for standing home residents. We urge the City to revise the plan to correct this before finalization. Pacific Palisades has an opportunity to model what a responsible, comprehensive WUI fire recovery looks like for standing home residents — not just for this community, but for every Los Angeles neighborhood and every California city that will face a WUI fire in the years ahead. The standards, programs, and protections developed here will serve as a blueprint. The City should seize that opportunity. Pacific Palisades has an opportunity to model what a responsible, comprehensive WUI fire recovery looks like for standing home residents — not just for this community, but for every Los Angeles neighborhood and every California city that will face a WUI fire in the years ahead. The standards, programs, and protections developed here will serve as a blueprint.

The Standing Homes Task Force is available to brief PPCC members and to provide input in support of any formal submission to the City. We welcome the opportunity to work alongside the PPCC to ensure that the needs of standing home residents are fully represented in the final LTRP.

A Final Word: When Survivors Wish Their Homes Had Burned

We close with an observation that should give every City official and frankly everyone pause.

Across Pacific Palisades, a significant number of residents with standing homes have expressed — candidly, repeatedly, and with evident pain — that they wish their home had burned to the ground. When residents of a community that survived a catastrophic wildfire express such a sentiment about their own property, the City should stop, ask why, listen without defensiveness, and act on what it hears. In the history of disaster recovery, it is difficult to imagine a more striking call that the needs of a defined group of survivors have gone unmet.

When residents express that they wish their homes had burned to the ground, that is not hyperbole — it is a precise description of how irrational the recovery process has made their situation. Most who lost everything have a clear path: federal assistance, blanket permit fee waivers, streamlined rebuilding, community solidarity. Those whose homes survived face contamination without standards, insurance disputes without advocacy, hardening requirements without grants, discarding much of what was in their home because it cannot be reliably cleaned, and a recovery plan that does not name them. After sixteen months, to many with standing homes this does not feel like an accident of oversight — it feels like a policy choice.

We respectfully request that the City take the opportunity to correct this policy choice.

Standing Homes ATF Members:

Co-leads: Robert Gold and Elissa Ashwood

Members: David Afzal, Cathrine Ruddy, Carmen Kadrnka, Kelly Gorman, Marianne Wisner