

Attachment "D"

Bel Air-Beverly Crest Neighborhood Council Draft letter on LA Recovery Motions February 20, 2025

The Bel Air-Beverly Crest Neighborhood Council watched with sorrow and dread as wildfire burned thousands of acres and destroyed tens of thousands of structures in Los Angeles. Our area, too, sits entirely within a Very High Fire Hazard Severity Zone and has a painful history of destructive fires in the past. Most notable are the Bel Air fire of 1961 and the Laurel Canyon fire of 1959. We were threatened, as well, by the Sunset Fire during the January 7th windstorm as well as several other minor fires. Our neighborhoods were spared the devastating effects of the recent conflagrations not due to superior preparation, infrastructure or emergency response but by mere happenstance.

So it is as citizens of communities on the wildland/urban interface and as engaged citizens of the City that we respectfully submit these comments on the many motions introduced in response to the fires and their aftermath. What happened in January must never happen again. Without a full and unflinching accounting of the failures and shortcomings that contributed to the devastation, this is impossible. Like all Angelenos, we expect answers to the common and critical questions: Why was the Santa Ynez Reservoir emptied when repairs to the cover were not imminent? Why weren't more firefighters deployed to the Palisades at the onset of the windstorm? Why wasn't the fire extinguished at an earlier stage? Why hasn't the electrical infrastructure been adequately hardened? A rushed response - whether in the assessment or rebuilding processes - will sell our hillside communities short and lay the groundwork for future disasters.

Additionally, while we appreciate the urgency behind the numerous motions introduced, their sheer volume and overlapping subject matter have made tracking and responding to them exceedingly difficult. We urge the Council to reorganize the motions into clearly-defined topic areas, with a central list of all requested reports organized by department made available to the public. Given the public's interest in both the response and the long-term recovery, it is essential that the Council ensures transparency and facilitates meaningful engagement.

Debris and Debris Removal

The destruction caused by the recent wildfires has left behind significant amounts of hazardous debris, including toxic materials that must be properly managed to prevent

long-term environmental and public health risks. The City must ensure that all contaminated soil is thoroughly removed and that remaining soil is tested to confirm it is free of hazardous substances.

In addition to proper hazardous material management, debris removal should be conducted with care, particularly regarding the preservation of trees. Those carrying out this work must be equipped with the necessary information and guidance to retain trees whenever feasible. Lessons learned from debris removal efforts following major wildfires—including the Woolsey, Paradise, and Maui fires—should be applied to improve efficiency, safety, and environmental stewardship.

Finally, transparency and equity must be central to this process. The proceedings of the Debris Removal Task Force should be made public to ensure accountability, allow for community input, and build trust in the recovery efforts.

Infrastructure

Ensuring coordination between the Los Angeles Department of Water & Power (LADWP) and the Los Angeles Fire Department (LAFD) is critical to wildfire prevention and response. We recommend that LADWP provide LAFD with weekly updates on the status of reservoirs and other water infrastructure, particularly when facilities are offline or undergoing repairs. This regular exchange of information will improve situational awareness and help avoid preventable water supply issues during emergencies.

LADWP should also assess the feasibility and implementation of undergrounding power lines in Very High Fire Hazard Severity Zones (VHFHSZs). While Chapter 4 of LADWP's June 2023 Wildfire Mitigation Plan thoroughly addresses key infrastructure vulnerabilities, the Department must ensure follow-through on its commitments and establish a clear timeline for full implementation. Without concrete deadlines, these risks remain unmitigated. Public engagement on these issues is essential, particularly in cases where undergrounding is infeasible. For example, poles with wide arms deployed in canyon areas reduce tree canopy, an undesirable outcome with environmental and aesthetic consequences. Infrastructure decisions should be made with these considerations in mind.

For power lines that remain above ground, the City must prioritize regular maintenance. LADWP should implement rigorous and proactive vegetation management, ensuring that trees and brush encroaching on power lines are properly trimmed. Additionally, brush beneath power poles must be adequately cleared to prevent sparks from igniting fires—whether from equipment failures, avian interactions, or other causes.

A full accounting of infrastructure shortcomings in all VHFHSZs is necessary to prevent future disasters. This assessment should include a report on the status of reservoirs and water tanks in the Santa Monica Mountains, ensuring that water availability meets emergency needs. Additionally, LADWP should provide a report on the deployment of automatic power shutoff technologies, which can cut electricity to compromised lines and prevent ignitions before they escalate into catastrophic fires.

New water infrastructure in VHFHSZs must be designed with fire resilience in mind. Buildings and mains in these zones should be required to incorporate remote shut-off valves, enabling rapid water conservation and distribution during emergencies.

Further, we urge the City to consider policies that transition fire-affected areas away from gas-operated heating and cooking equipment in favor of electric alternatives. Electrification in these zones can reduce fire risks, improve safety, and support the necessary power grid upgrades that should accompany wildfire mitigation efforts.

Finally, when Environmental Protection Agency (EPA) regulations may hinder wildfire preparedness, appropriate risk assessments must be carried out. Risk assessments must assume that air resources during Santa Ana wind events will not be available.

Public Safety

Angelenos deserve a full accounting of how the City's budget crisis impacted the devastation—both in enforcement of fire regulations and deployment of resources. Public safety must be a top budgetary priority. Never again should the Brush Clearance Division be so underfunded that enforcement is compromised. Inadequate funding for brush clearance puts entire communities at risk, and the City must ensure that this critical function receives the necessary resources. Likewise, LAFD must commit resources for fire hydrant testing and must report any deficiencies to LADWP.

Technological advancements can mitigate fire risks in the wildland-urban interface and prevent disasters before they occur. The Los Angeles Fire Department (LAFD) should provide a comprehensive report on available fire mitigation technologies, including the use of fire retardants, drones, and other emerging tools that can aid in both prevention and rapid response.

Additionally, hillside homeowners play a crucial role in fire resilience. The City should report on the adoption of house-hardening measures, such as fire-resistant roofing, ember-resistant vents, and defensible space. Further, a review of new state laws related to wildfire resilience should be conducted to assess their implementation and enforcement within Los Angeles.

Finally, the City should examine whether it would benefit from its own dedicated emergency alert system. Reliable and localized alerts could improve public awareness and response times, ensuring that residents receive timely, actionable information when wildfires threaten their communities.

Land Use

The City should seize this opportunity to foster an environment where new construction and rebuilding creates the most sustainable, energy-efficient, and fire-resilient buildings possible rather than perpetuating land-use mistakes of the past. Many experts emphasize that rebuilding “as before” will result in a community still vulnerable to climate change. This is a critical moment to reassess the viability of existing land-use practices and implement the latest building science on fire safety and resilience.

The goals and methods established in the Mayor’s Executive Order should be revised to align with the following City Council Motions which we support:

- Motion [25-0006-S38](#) regarding the creation of a Climate Resilience District for the areas directly impacted by and adjacent to the Pacific Palisades Fire.
- Motion [25-0006-S46](#) regarding adopting an incentive program for residential and commercial property owners that voluntarily implement construction best practices for fire resiliency beyond what is currently required in the Building Codes.
- Motion [25-0173](#) regarding extending permit expiration dates for low rise residential and commercial projects in the fire affected areas.

Additionally, we recommend the following measures be prioritized:

- Expedited enforcement of California Assembly Bill AB 3074, which requires the creation of ember-resistant zones for both new and existing construction in fire-damaged areas, particularly in Pacific Palisades.
- Any new construction must strictly adhere to all building codes and meet or exceed all fire-hardening requirements. Discretionary requests for loosening fire-hardening standards, such as decreased set backs, shall not be granted. Other fire-prone cities, such as Austin, Texas, and Louisville, Colorado, have already implemented stricter wildfire-resistant building codes, providing models for action that Los Angeles should follow.

By embedding climate resilience and fire safety into rebuilding efforts, the City can prevent future disasters while fostering more sustainable and resilient communities.

Budgetary Concerns

The scale of recovery and rebuilding will require significant labor resources, particularly in the permitting process. The Bel Air-Beverly Crest Neighborhood Council (BABCNC) recommends that the City conduct an assessment of labor needs, accompanied by a hiring and training schedule that ensures adequate staffing while remaining mindful of budgetary constraints.

The recent wildfires exacerbated existing budget shortfalls, which had already impacted firefighting capabilities and fire spread containment in specific ways that require a detailed accounting and analysis. The City's Reserve Fund, already precariously low at 4%, was projected to be \$250 million in deficit before the Palisades and Eaton Fires. The City must now estimate the short-term and long-term financial impacts of these disasters on its overall budget.

Additionally, the City should evaluate unbudgeted services provided in response to the wildfires that may be ineligible for federal or state reimbursement and identify alternative funding sources to cover these costs.

To bridge the financial gap while awaiting Federal Emergency Management Agency (FEMA) reimbursements, the City must immediately assess how state wildfire aid can be leveraged to front-fund the estimated \$350 million required for emergency response and recovery. This assessment should explore funding mechanisms, including:

- Special fund loans
- Municipal Improvement Corporation of Los Angeles (MICLA) financing
- Building and Safety Enterprise Fund
- Public Works Trust Fund
- Proposition 4 Bond Revenue
- City-issued non-voter-approved bonds

The City of Los Angeles is also requesting that the State of California provide gap funding to ensure that essential city services continue uninterrupted during wildfire recovery. This funding would be repaid to the State once FEMA reimbursement is received, ensuring that California taxpayers are made whole.

The City should also consider the burden of the Olympics on our overstretched budget and the possibility that the commitment to host this event will inhibit our capacity to incorporate best practices into fire prevention/rebuilding.

Finally, budgeting moving forward must reflect the heightened fire risks facing Los Angeles. Governor Newsom's call for lawmakers to accelerate \$1 billion in emergency response funding is a critical step, but the City must ensure that future budgets allocate sustained resources for fire preparedness, mitigation, and emergency response to prevent a repeat of this crisis.

Environment

Air Quality

The widespread ash and debris left by the wildfires contain hazardous toxins that pose a serious public health risk. To mitigate this, an ordinance has already been passed prohibiting the use of all leaf blowers in the Palisades, Sunset, Hurst, and Kenneth Fire burn areas until February 2026. We strongly support this measure and urge the City Council to establish a clear enforcement strategy given the widespread use of leaf blowers in Los Angeles. Without proper enforcement, compliance will be inconsistent, undermining the ordinance's intended air quality benefits.

Additionally, we recommend that the Los Angeles County Department of Public Health and the South Coast Air Quality Management District (SCAQMD) continue to provide regular updates to the City Council on air quality conditions throughout the debris removal process. The public must receive proper and specific guidance on how to protect themselves from harmful particulate matter that remains suspended in the environment as a result of the fires.

Red Flag Days

The Red Flag Days ordinance must be strengthened to enhance public safety, particularly in Very High Fire Hazard Severity Zones (VHFHSZs). We recommend:

- Clear enforcement measures that are codified and consistently applied.
- Closure of all City parks located in VHFHSZs when Red Flag Days are declared to reduce fire ignition risks.

- Collaboration between the Department of Recreation and Parks and the City Attorney to develop legal enforcement mechanisms for these closures.
- Stronger enforcement against camping in public spaces during Red Flag Days in fire-prone areas, as encampments present significant fire hazards.
- Additional constraints on impactful construction activities and filming.

Climate Mitigation & City Fleet Electrification

Los Angeles must also take proactive steps to mitigate climate change, a primary driver of increasing wildfire frequency and severity. We encourage the City to reduce fossil fuel consumption by prioritizing:

- The conversion of City-owned vehicles to electric and low-emission alternatives.
- Policies and programs that support decarbonization and clean energy adoption across municipal operations.

By addressing both immediate fire recovery needs and long-term climate adaptation, the City can create a safer, more resilient future for all Angelenos.

Conclusion

The devastation caused by the January 2025 wildfires demands more than just rebuilding—it requires systemic change to ensure that such a catastrophe never happens again. As a community deeply familiar with wildfire risk, we urge the City Council to take a comprehensive, transparent, and forward-thinking approach to the future, focusing on accountability, preparedness, and resilience.

Wildfire response and prevention must be a budgetary priority, and the lessons learned from this disaster should guide policy decisions moving forward. Critical infrastructure improvements, including hardening electrical grids, strengthening water systems, and enforcing fire-safe building practices, must be pursued with urgency. Similarly, debris removal, air quality protections, and Red Flag Day enforcement must be carried out with public health and environmental safety at the forefront.

Community engagement in this process is essential. The City's decision-making process must be clear, coordinated, and accessible, with streamlined reporting and meaningful opportunities for public input. A disjointed approach to wildfire recovery will only lead to future disasters.

The fires of January 2025 were a wake-up call. The policies and actions taken now will determine whether Los Angeles remains on a cycle of destruction and reactive recovery or emerges as a leader in wildfire resilience, public safety, and climate adaptation. The Bel Air-Beverly Crest Neighborhood Council stands ready to work alongside City leadership and the broader community to make that vision a reality.