

January 15, 2025

Office of Mayor Karen Bass,
City of Los Angeles
200 N. Spring St.
Los Angeles, CA 90012

RE: Suggested Additional Emergency Measures to Facilitate Relief from Wildfire Destruction

To the Office of Mayor Karen Bass,

In light of the recent wildfires affecting the City of Los Angeles and surrounding areas, our office urges Mayor Karen Bass to implement additional critical measures that facilitate relief for impacted property owners. As an office that interfaces between private entities and the City of Los Angeles, we are intimately familiar with current City processes, and the challenges of permitting and approvals through the Los Angeles Department of Building and Safety (“LADBS”) and related departments. As such, we are recommending a series of measures to strengthen Emergency Declaration No. 1 issued by Mayor Bass on January 13, 2025 that we believe can further aid recovery from this catastrophe.

In order to alleviate the burden of this tragedy on homeowners and business owners, these measures should include changes to City processes and procedures that ensure navigating rebuilding does not create undue challenges and costs. The following is a series of suggested modifications to existing City processes and procedures that could be implemented immediately to aid impacted property owners.

1. Elimination of Licensed Professional Release Requirement Regarding Requests for Blueprints and Building Plans of Record

Homeowners impacted by this crisis may need to obtain copies of architectural plans on record with the Department of Building and Safety. The current process for requesting building blueprints requires both proof of property ownership in the form of a grant deed or other legal title, and an original notarized release letter from the architect and/or engineer of record (“ARO”) who stamped the plans (“licensed professional release letter”). In many cases, homes and business structures were already constructed when acquired by owners, and as such, there is no access to any digitized original building plans, and/or access to the original architect and/or engineer. Requiring this release letter places a prohibitive, and in some cases impossible requirement on property owners seeking blueprints for both insurance claims and rebuilding efforts. In particular, the original blueprints may be the only documentation available of the existing structure that can be submitted as part of insurance claims. The current process not only requires a letter from the architect or engineer if they are living, but an attempt to find a “successor” of deceased professionals. This requirement is unnecessarily onerous and places a significant burden on property owners in this time of crisis.

Suggested Emergency Measures to Facilitate Relief from Wildfire Destruction

January 15, 2025

Page 2 of 4

Therefore, we urge Mayor Bass to direct LADBS to eliminate the licensed professional release letter requirement from the “Requests for Blueprints” process, and to create a process to permit property owners to obtain building plans and records for their own properties without any other consents from third parties. Furthermore, LADBS shall facilitate these records requests within five (5) days of receipt of such requests.

2. Expedited Re-issuance of Recently Issued Building Permits

In order to facilitate reconstruction of recently permitted projects that have been impacted by the fires, an expedited permit issuance process should be established for those buildings that received permits within the last five (5) years as of January 2025. These permits should be reissued by LADBS, over the counter, with no further plan check process, clearances, or associated fees.

We urge Mayor Bass to direct LADBS to establish an expedited permit re-issuance process for permits issued within the last five (5) years, which would ensure no plan check processes or new permit fees for homeowners or businesses who may have recently endured through the city’s process, and have valid and code compliant plans from the past five years.

3. Emergency Time Extensions for In Process Building Permits

Many homeowners and businesses may have pending/in process building permits and/or entitlements for pending or future projects.

The City of Los Angeles should issue an emergency declaration extending the life of all in process permits and/or other discretionary approvals for a period of an additional 36 months, to permit those processes to continue without penalty of termination. Furthermore, any applicant with a currently open discretionary application shall be eligible for ministerial review pursuant to Emergency Executive Order No. 1, issued January 13, 2025.

4. Building Permit Fee Waiver Program

The permit fees associated with the building plan check process with LADBS may pose a huge burden for property owners already bearing significant financial impacts from the fires. To ensure that reconstruction is financially feasible for property owners, a fee waiver or fee reduction schedule should be available for any building permit applications necessary to rebuild impacted properties.

We urge Mayor Bass to direct LADBS to create a fee waiver program for permits issued related to structures impacted by the fires.

Suggested Emergency Measures to Facilitate Relief from Wildfire Destruction

January 15, 2025

Page 3 of 4

5. Dedicated Permit Expediting Team in West Los Angeles

Emergency Order No. 1 calls for a Development Strike Force to be established to facilitate streamlining rebuilding efforts. We are in full support of this effort, and would further suggest that this strike force be established at the West Los Angeles offices of LADBS to provide easy accessibility to wildfire victims. Furthermore, due to the magnitude of these rebuilding efforts, it is anticipated that LADBS will assume an unusually high volume of new building permit applications and related requests. The City of Los Angeles still has other critical business to maintain, and in order to protect available resources at the main Metropolitan offices of LADBS, or those located in Van Nuys or San Pedro, focusing the task force and a permitting concierge service in West Los Angeles will ensure access to resources for wildfire victims, while not further diluting the City's already strained staffing resources throughout the remainder of the City.

We thus urge Mayor Bass to direct LADBS to create a dedicated West Los Angeles Department Strike Force concierge team to solely process building permit applications related to Wildfire recovery and rebuilding.

6. Coordinate Efforts Between the Bureau of Engineering and the Department of Transportation to Eliminate Offsite Improvement Requirements

One of the most cumbersome pieces of any development project in the City is the unknown and sometimes untenable costs of offsite improvements placed on property owners. This includes land dedications that reduce usable and buildable lot area, sidewalk, street, and infrastructure improvements, and similar impositions. Given the immense rebuilding effort, we believe the City of Los Angeles should waive all street dedication and improvement requirements traditionally assessed on property owners and applicants, and assume the responsibility for reconstruction of city streets and rights-of-way, including necessary infrastructure at the City level. This is to ensure that those efforts are not implemented piecemeal through individual building applications. This burden is excessive particularly for single-family homeowners, and could be coordinated more effectively as a City effort, potentially with reasonable costs assessed to properties through the rebuild process. We believe that if the City does not assume these responsibilities, the basic roadway infrastructure necessary to support repopulation will not occur in a coordinated matter if assessed as an individual property owner responsibility.

We thus urge Mayor Bass to immediately establish a task force agency dedicated to master infrastructure improvements throughout areas affected by the Palisades fire, to enable residents and businesses to re-establish in a timely manner, and execution of infrastructure rebuilding within 180 days of demolition and remediation efforts in burn areas.

Suggested Emergency Measures to Facilitate Relief from Wildfire Destruction

January 15, 2025

Page 4 of 4

We further urge Mayor Bass to take real and specific action towards rebuilding and recovery efforts that ensure LADBS and other City department's processes and procedures do not inhibit the ability of property owners to repair and replace structure impacted by the fires.

Thank you for consideration of these suggested measures,

Respectfully,
ThreeSixty

A handwritten signature in blue ink that reads "Dana Sayles". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dana A. Sayles, ACIP

CC: Councilmember Traci Park, Council District 11