Joe Marrs
The Lafayette Condominiums
140 Linden Avenue #801
Long Beach, CA 90802

June 17, 2007

City of Long Beach City Council Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

Attention: City Councilmembers

Re: Proposed Fire Sprinkler Ordinance

Dear Councilmembers,

At the May 22nd meeting of the Public Safety Committee, the need was expressed for the adoption of reasonable and appropriate alternative fire safety measures for historic buildings. It was our feeling that the committee members took our comments into consideration and asked that they be incorporated into the ordinance. However, now that this proposed ordinance is coming before the council for a vote, we need to be assured that these concerns are properly addressed. I notice that the description of the Public Safety Committee meeting minutes and proposed resolution in the agenda for the Council meeting makes no mention of consideration of historic landmark status, which concerns me.

Please consider supporting an amendment to the recommendation as it is worded on the agenda "requesting the City Attorney to consider and incorporate reference to California State Codes H&S 13143.2(e) & 13143.5(h) governing the application of local fire safety codes to Historic Landmark structures, in preparing the proposed ordinance" so that this aspect of the proposed ordinance can be addressed appropriately..

An exemption or alternative compliance mechanism for our historic buildings that cannot be easily and economically retrofitted with fire sprinklers must be spelled out clearly in this ordinance. State law mandates, in the California State Historic Building Code, as stated by the Calfornia State Architect's guide to Fire Protection and the State Historic Building Code, the "adoption of measures which will provide a reasonable degree of defense from risk, and assumes that, as a performance code, jurisdictions, engineers and owners will cooperate in effecting a solution at minimum loss of historic fabric or historic character...Apart from insuring a reasonable level of life safety, there is a need to compromise where measures intended for property protection threaten or conflict with the preservation of significant historic and architectural features...

Once a reasonable level of life safety for occupants and fire-fighting personnel has been established, anything beyond must be understood as a bonus, not a mandate... Finally, it must be recognized that, with respect to qualified historic buildings, jurisdictions are enjoined [H&S 13143.2(e) & 13143.5(h)] from generating alternatives to, or more stringent fire, panic, and related standards than, those which exist in the California Building Standards Code, which, for historic buildings is Title 24, Part 8, the SHBC."

We at the Lafayette already have a comprehensive fire prevention safety program in effect, along with a state of the art detection and alarm system. We feel strongly that The Lafayette is currently in compliance with the intent of the state laws regarding historic buildings, as referenced above. One other citation from the State Architect sums up the appropriateness of our safety measures: "while we may not neglect the life-safety of fire fighting personnel, the safe evacuation of building occupants can almost universally be achieved by means of early detection and warning systems, most of which can be installed with little or no threat to historic fabric."

No one disagrees that the benefits of fire sprinklers in new construction are clear, however, for the city to impose these stringent retrofit codes on our historic structures would not only be an economic burden on homeowners, but also clearly in conflict with state law. When there are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement in a timely manner, not 10 years later, why not pursue this type of alternative compliance as a reasonable option?

Thank you for your consideration.

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Sincerek

PS Attached is a summary outline of our Fire Safety Plan showing the type of alternative compliance we are proposing as appropriate for historic buildings such as The Lafayette.

The Lafayette Association of Homeowners

City of Long Beach Fire Department

Attention: Fire Marshall Hank Teran

Dear Fire Marshall Teran,

Thank you for the brief introduction and meeting with Sharon Hays, our office manager and Joe Marrs of our association after the Public Safety Committee meeting last month. They felt that based on your conversation, and talking with our recent Fire Safety Inspector, we can build on the elements of our existing fire safety plan currently in place at The Lafayette to develop an acceptable program for alternative compliance to the city's proposed fire sprinkler code.

Our feeling is that if we can identify the elements of such a plan, lets not wait 10 years to implement, as stated in the proposed ordinance. Let's develop a comprehensive alternative compliance plan that can be approved and put into action right now; one that can hopefully be used as a model for other historic buildings within the jurisdiction of this ordinance as well.

As a starting point, we have identified the components that we feel are important for a building such as ours, and have included an outline of such a plan. Of course, your input is very important; we would appreciate meeting with you or your designated staff prior to the June 19th City Council meeting date when the fire sprinklers ordinance will be addressed by the entire council. Showing that an effective alternative means of compliance can be easily and quickly implemented would be a beneficial win-win situation for everyone involved, and could defuse a great deal of the criticisms of the proposed ordinance, as well as improving the fire safety of our historic buildings now, not ten years down the road.

The Lafayette board of directors will ask Sharon Hays to contact your office soon regarding meeting to discuss our ideas, and we look forward to hearing your input.

Sincerely,

Joe Hill
President, The Lafayette Association of Homeowners

enclosure: proposed outline - Fire Safety Plan

[Proposed Outline]

Fire Safety Plan Historic Building Alternative Compliance

Lafayette Condominiums 140 Linden Avenue Long Beach

June, 2007

I. Fire Safety Mission Statement

Pursue, evaluate and adopt a rational combination of systems, materials and methodologies which will provide an effective and reasonable level of fire prevention and life safety as an acceptable alternative compliance to the requirements of [Fire Sprinkler Ordinance #]

II. Fire Safety Systems

- a. Maintain a state of the art fire alarm system with the following elements, in all common areas of the buildings under the association's control:
- 1. Smoke detection system
- 2. Audible annunciatior system
- 3. Visual alarm system
- 4. Centrally located control panel with zoned alarm identification
- 4. Direct automated link to Fire Department's emergency dispatch center.
- 5. System components to be under inspection and maintenance contract with approved service provider.
- 6. System components to be subject to regularly scheduled inspection as well as unscheduled inspection at any time by Fire Department personnel.
- b. Required UL Approved Smoke Detectors to be installed and maintained in multiple locations within each residential unit. Fire extinguishers are to be maintained within each unit.
- 1. Detectors to be installed in each hallway and bedroom, as well as any additional locations designated by Fire Department's Fire Safety personnel.
- 2. Detectors and fire extinguishers to be inspected annually by building management, incorporating battery testing and replacement program as part of inspection.
- 3. Non-compliance penalties to be incorporated in association's rules and regulations, as well as notification of violation and required corrective action.
- c. Maintain isolation of safety zones via proper fire rated doors, seals and hardware.
- 1. Require unit owners to install and maintain code rated door seals and fire rated solid core doors at each individual occupancy entry.
- 2. Maintain code rated door seals and automatic door closing hardware at all entrances to designated fire stairs.
- d. Maintain a system of building-wide evacuation signage with the review and direction of Fire Safety personnel.

III. Fire Safety Education and Training Programs

- a. Maintain a Fire Safety Team consisting of resident Floor Monitors within each building, the Building Manager and designated building maintenance employees, as well as any Fire Safety personnel as directed by the Fire Marshall, with mandatory attendance at regularly scheduled fire safety seminars and training drills. Any special training sessions in high-rise fire safety, as required by the Fire Marshall, are to be completed by all team members.
- b. Maintain a plan of regularly scheduled fire drills, with the participation of all Fire Safety Team members and all residents. Drills are to incorporate both usual routes of exits, as well as alternative exit strategies, as well as post-drill review.
- c. Maintain resident emergency data, to include any special needs such as handicapped persons.
- d. Maintain and regularly distribute appropriate fire safety information to all residents, including briefing new residents upon taking occupancy.

IV. Fire Safety Inspection Program

- a. Daily inspection of common areas of the buildings for any hazardous conditions shall be made as a regular part of duties of the building's maintenance staff, who shall promptly report any hazardous conditions, situations or activities noted to the building manager for action. Maintenance staff shall also be required to attend regularly scheduled fire safety seminars and training drills. Bilingual materials and translations shall be made available as appropriate.
- b. Floor Monitors are to complete regular monthly inspections of the common areas of each floor, and promptly report any hazardous conditions, situations or activities noted to the building manager for action. In addition, any such conditions noted at any other time are to be reported immediately.
- c. Building Manager to complete regular monthly inspections of the common areas of the building, including those areas not under inspection by individual Floor Monitors, and take appropriate action to resolve any hazardous conditions, situations or activities noted. In addition, any unresolved conditions noted are to be reported to the Board of Directors for action.
- d. Comprehensive building inspections by the Fire Department's Fire Safety Inspector shall be conducted on a regular basis, with unscheduled inspections or personnel training sessions invited at any time.

V. Fire Safety Emergency Management Plan

- a. Develop and maintain, under the guidance of the Fire Marshall, an emergency management plan, incorporating a plan of action for effective response to fire and other emergency situations. Plan shall incorporate but not be limited to the following elements:
- 1. Responsibility for contacting the Fire Department in event of alarm
- 2. Meeting and briefing arriving Fire Department personnel
- 3. Plan and procedure for verifying automatic and manual recalling of building elevators
- 4. Monitoring fire alarm control panel in event of emergency for additional alarms, until Fire Department personnel is on the scene
- 5. Plan for ensuring immediate access to resident emergency data, including special needs identification, for emergency personnel responders.
- 6. Identify likely supporting roles for building's Fire Safety Team members, as directed by Fire Department personnel, after their arrival on the scene.
- b. Review plan annually with appropriate Fire Department personnel and Fire Safety Team members; update as necessary.

Residents of The Lafayette Condominiums 140 Linden Avenue Long Beach, CA 90802

June 14, 2007

City of Long Beach City Council Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

Attention: City Councilmembers

Re: Proposed Fire Sprinkler Ordinance

Dear City Councilmembers,

We, the homeowners and residents of The Lafayette Condominiums, urge the council to consider the financial impact on homeowners, and draft an exemption for the city's affected historic high rise buildings from the proposed mandatory retrofit fire sprinkler ordinance, for the following reasons:

Such a requirement would be extremely costly, resulting in a decline in value and homeowners losing their homes, as happened during our last seismic/fire safety related assessment.

There are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement, as we have demonstrated here at The Lafayette.

We at the Lafayette already have a comprehensive fire prevention safety program in effect, along with a state of the art detection and alarm system. We feel strongly that The Lafayette is already in good compliance with the intent of the state laws regarding historic buildings and fire safety.

Please consider either an exemption of the affected historic structures, or delaying a decision on this aspect of the proposed ordinance until these issues can be addressed completely. Thank you for your consideration.

Sincerely, the undersigned Lafayette homeowners and residents

Name Marlene Law Graham Signature MLG (Walt Unit # 958

Marlene Law Graham 140 Linden Avenue # 958 Long Beach, CA 90802

June 19, 2007

City of Long Beach Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

Attention: City Councilmembers

Re: Proposed Fire Sprinkler Ordinance

Dear City Councilmembers,

At the May 22nd meeting of the Public Safety Committee, a large number of Long Beach residents voiced their concerns regarding the major financial burden of the proposed mandatory fire sprinkler retrofit requirement for all existing residential high-rise buildings in the city of Long Beach. As well, the need was expressed for the adoption of reasonable and appropriate alternative fire safety measures for historic buildings.

We strongly urge you to consider the financial impact of this portion of the proposed ordinance, which would affect all residents of these buildings, especially senior citizens and others on a fixed income. These people are a large segment of the historic high-rise condo population in our city; now they face the prospect of losing their homes because of costly homeowners assessments for mandatory retrofits. The community as a whole cannot afford another reason for the downtown Long Beach real estate economy to decline even further.

While the benefits of fire sprinklers in new construction are clear, there are no comparable cities in southern California with mandatory fire sprinkler retrofit ordinances; only one smaller city has enacted such a law. Why subject our Long Beach homeowners to this costly ordeal when there are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement in a timely manner, not 10 years later?

Please consider delaying a decision on this aspect of the proposed ordinance until these issues can be addressed in a way that doesn't leave us in jeopardy. We appreciate your concern, and thank you for your consideration.

Sincerely.

Marlene Law Graham

Sharon Hays

From: Kenton Haleem [kjhaleem@charter.net]

Saturday, June 16, 2007 1:34 PM Sent:

To: suja lowenthal@longbeach.gov

dee_andrews@longbeach.gov; Broc_Coward@longbeach.gov; Sharon Hays; Cc:

bonnie_lownethal@longbeach.gov; rae_gabelich@longbeach.gov; district2@longbeach.gov; district1@longbeach.gov; tonia_reyesuranga@longbeach.gov; district3@longbeach.gov;

district4@longbeach.gov; district5@longbeach.gov; district6@longbeach.gov; district7@longbeach.gov;

district8@longbeach.gov; district9@longbeach.gov; gary_delong@longbeach.gov;

patrick_odonnell@longbeach.gov; gerrie_schipske@longbeach.gov; val_lerch@longbeach.gov;

mayor@longbeach.gov

Subject: sprinkler retrofit for historic buildings, constituent letter

140 Linden Avenue #751 Long Beach, CA 90802

June 16, 2007

Suja Lowenthal Councilmember, Second District City of Long Beach 333 West Ocean Boulevard, 14th Floor Long Beach, CA 90802

Dear Suia.

I am extremely wary to discover that the Long Beach Fire Department (LBFD) is attempting to create and pass new regulations related to mandatory sprinklers in all of Long Beach's mid- and high-rise condominiums. More concerning is that such suggestions are still proceeding to City Council with no exemption for historic buildings.

Beyond the difficult financial hurtles being proposed to residents with new regulations passing, I find it unfair to extract hundreds of thousands of dollars from taxpayers and voters for sprinklers that, in all likelihood, will never see use, and have the potential to cause thousands of dollars in personal and communal damage to property if employed. Such financial hardships are particularly difficult for elderly and low- and middle-income individuals who stand to lose their property due to an inability to pay or finance such a hefty levy. Suggesting residents utilize home equity lines of credit is no solution for individuals who love their neighborhood and have no plans to move. Such financing would simply burden homeowners with the expense of monthly interest and slice another piece from earnings.

My building, the Lafayette, has an advanced detection system designed to alert residents and LBFD in the event of a fire, whether serious or benign. My floor alone includes built-in functioning fire hoses, deafening alarms, fire extinguishers, fire detectors and three stairwells for safe exit. Additionally, our building has the capability of detecting the location of activated alarms while directly notifying LBFD through an automated system.

While built-in sprinklers are advantageous in new buildings, especially those constructed of combustible materials, I see no need for such a sprinkler system in the Lafayette, and other historic edifices. Beyond exorbitant monetary costs, the visual integrity of our buildings and units would be compromised and ruined. Additionally, units in Lafayette are heated through radiant ceiling heat. This is our only built-in source of heating. To eliminate sections of this system to accommodate sprinklers and installation would render sections, and possible the entire system, inoperative. In turn, making any future resale impossible without reinstalling a new heating system, not to mention unlivable conditions in winter. Costs to replace heating along with sprinkler costs is simply inconceivable, outright unfair and, frankly, laughable.

I ask you, and City Council, to look at established state guidelines in facilitating discussion, amendments and voting on this critical issue for residents, taxpayers and voters. I find it hard to believe that Long Beach would choose to supersede California state law and regulations. Below are some specific quotes from the State Historic Building Code (SHBC), which are relevant and pertinent.

... built into the SHBC is the latitude to pursue, evaluate and adopt any rational combination of materials and methodologies which will provide a reasonable level of life-safety. Detection technology has permitted us to recognize that they, together with smoke seals, may now be a building's most effective life-safety combination.

That sprinklers- installed in a manner that neither threatens nor defaces historic fabric, and that can be accomplished within the financial constraints of the owners- are a distinct and highly desirable bonus, cannot be denied. But once a reasonable level of life-safety for occupants and fire-fighter personnel has been established, anything beyond must be understood as a bonus, not a mandate. For this reason, there may arise circumstances where partial fire sprinklers systems- or even no fire sprinkler systems- may be appropriate, however otherwise desirable. And while we may not neglect the life-safety of fire fighting personnel, the safe evacuation of building occupants can almost universally be achieved by means of early detection and warning systems, most of which can be installed with little or no threat to historic fabric.

Finally, it must be recognized that, with respect to **qualified historic buildings**, jurisdictions are enjoined {H & S 13143.2 (e) & 13143.5 (h)} from generating alternatives to, or more stringent fire, panic, and related standards than, those which exist in the California Building Standards Code, which, for historic buildings is Title 24, Part 8, the SHBC.

I urge you as a voter, homeowner and constructive city resident, to shield the Lafayette, and other historic buildings, from new sprinkler regulations by passing an amendment that protects us and recognizes our vast collection of fire preventative devices already installed and upgraded in our building to prevent fires and alert residents and authorities.

Best,

Kenton Haleem Lafayette Homeowner

Cc: Mayor Bob Foster, Long Beach City Council, Districts 1-9, Lafayette Homeowners Association

Greg Bayer 140 Linden Avenue # 734 Long Beach, CA 90802

June 14, 2007

City of Long Beach Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

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Re: Proposed Fire Sprinkler Ordinance

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We strongly urge you to consider the financial impact of this portion of the proposed ordinance, which would affect all residents of these buildings, especially senior citizens and others on a fixed income. These people are a large segment of the historic high-rise condo population in our city; now they face the prospect of losing their homes because of costly homeowners assessments for mandatory retrofits. The community as a whole cannot afford another reason for the downtown Long Beach real estate economy to decline even further.

While the benefits of fire sprinklers in new construction are clear, there are no comparable cities in southern California with mandatory fire sprinkler retrofit ordinances; only one smaller city has enacted such a law. Why subject our Long Beach homeowners to this costly ordeal when there are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement in a timely manner, not 10 years later?

Please consider delaying a decision on this aspect of the proposed ordinance until these issues can be addressed in a way that doesn't leave us in jeopardy. We appreciate your concern, and thank you for your consideration.

Sincerely,

Nathandra R. Boudoi 140 Linden Avenue #516 Long Beach, CA 90802

June 14, 2007

City of Long Beach City Council Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

Attention: City Council Members

Re: Proposed Fire Sprinkler Ordinance

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buildings, as referenced above. One other citation from the State Architect sums up the appropriateness of our safety measures: "while we may not neglect the life-safety of fire fighting personnel, the safe evacuation of building occupants can almost universally be achieved by means of early detection and warning systems, most of which can be installed with little or no threat to historic fabric."

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Please consider either an exemption of the affected historic structures, or delaying a decision on this aspect of the proposed ordinance until these issues can be addressed completely. Thank you for your consideration.

Sincerely

Lafavette Homeowner

P.S. Attached is a summary outline of our Fire Safety Plan showing the type of alternative compliance we are proposing as appropriate for historic buildings such as The Lafayette.

Residents of The Lafayette Condominiums 140 Linden Avenue Long Beach, CA 90802

June 14, 2007

City of Long Beach City Council Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

Attention: City Council Members

Re: Proposed Fire Sprinkler Ordinance

Dear City Council Members,

We, the homeowners and residents of The Lafayette Condominiums, urge the council to consider the financial impact on homeowners, and draft an exemption for the city's affected historic high rise buildings from the proposed mandatory retrofit fire sprinkler ordinance, for the following reasons:

Such a requirement would be extremely costly, resulting in a decline in value and homeowners losing their homes, as happened during our last seismic/fire safety related assessment.

There are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement, as we have demonstrated here at The Lafayette.

We at the Lafayette already have a comprehensive fire prevention safety program in effect, along with a state-of-the-art detection and alarm system. We feel strongly that The Lafayette is already in good compliance with the intent of the state laws regarding historic buildings and fire safety.

Please consider either an exemption of the affected historic structures, or delaying a decision on this aspect of the proposed ordinance until these issues can be addressed completely. Thank you for your consideration.

Sincerely,

Lafayette Homeowner

Name Sign

Signature

Unit#

Nathandra R. Boudoi 140 Linden Avenue #516 Long Beach, CA 90802

June 14, 2007

City of Long Beach Civic Center Plaza Attention: City Council Members 333 West Ocean Boulevard Long Beach, CA 90802

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We strongly urge you to consider the financial impact of this portion of the proposed ordinance, which would affect all residents of these buildings, especially senior citizens and others on a fixed income. These people are a large segment of the historic high-rise condo population in our city; now they face the prospect of losing their homes because of costly homeowners' assessments for mandatory retrofits. The community as a whole cannot afford another reason for the downtown Long Beach real estate economy to decline even further.

While the benefits of fire sprinklers in new construction are clear, there are no comparable cities in southern California with mandatory fire sprinkler retrofit ordinances; only one smaller city has enacted such a law. Why subject our Long Beach homeowners to this costly ordeal when there are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement in a timely manner, not 10 years later?

Please consider delaying a decision on this aspect of the proposed ordinance until these issues can be addressed in a way that doesn't leave us in jeopardy. We appreciate your concern, and thank you for your consideration.

Lafayette Homeowner

Sincere

Residents of The Cooper Arms 455 East Ocean Blvd Long Beach, CA 90802

June 19, 2007

City of Long Beach City Council Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

Attention: City Councilmembers

Re: Proposed Fire Sprinkler Ordinance

Dear City Councilmembers,

We, the homeowners and residents of The Cooper Arms Condominiums, urge the council to consider the financial impact on homeowners, and draft an exemption for the city's affected historic high rise buildings from the proposed mandatory retrofit fire sprinkler ordinance, for the following reasons:

Such a requirement would be extremely costly, resulting in a decline in value and homeowners losing their homes, as happened during our last seismic/fire safety related assessment.

There are many other fire safety and fire prevention measures that are far less costly to implement, and easier to implement.

Please consider either an exemption of the affected historic structures, or delaying a decision on this aspect of the proposed ordinance until these issues can be addressed

completely. Thank you for your consideration.

Sincerely, the undersigned Cooper Arms Homeowners and Residents

COOPER ARMS
Ocean Blvd
Long Beach, CA 908

Nar	ne Signature '
Uni	t#
# 1211	Prentiss Collier were
# 302	
# 900	Recore LANG THE
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209	Jose Maranjo Jose Madinjo
#616	REDECCH Mouthon Release Monther
1115	Lella David Coy
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1202	They do De Street Javett
106	There Stevens
#505	Ciel Dylan Vill Dylan
801	CG Krueger CG trulon
502	Louis James 60 ce Librallo
102	Songù Sagolo
#711	Jimmy Palacius Mun
511	LG English Senglish
1108	Edward Hore Sound Men

the undersigned Cooper Arms Homeowners and Residents

Name Unit#	Signature /
447	Tirley Line
#216	EDWARD B. DOWLING Strand B Early
#1004	J.L.YOUNG MAG
# 403	Nicolas 3 ORDAGE
#310	Byon Richards
# 903	MARY SANBORN Mary & Sanbon
811	Flagd Olson
# 6/2	ROBIN D. WILKES COM
*304	Burnard Bulchen
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Residents of The Lafayette Condominiums 140 Linden Avenue Long Beach, CA 90802

June 14, 2007

City of Long Beach City Council Civic Center Plaza 333 West Ocean Boulevard Long Beach, CA 90802

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Sincerely, the undersigned Lafayette homeowners and residents

Name	Signature	Unit#
Julie	Nemechale Que Memelile	532
_	TIS COPNAN DO	503
Do	m bower Solly	854
Louis	se Dielenbach, a. Dielenbach	356
Amy	Stock) A = 1	552
depul	Toron	428
Hai	rry Sumako MID	55.5
San	Mathews Samuel 9 Enter	724
Tour	SCOBOSCHUSCY	428
Sus	an Phirry	651
DAG	TO PHINNEY	651
Carlos	Yamay	328
M		324
Dan	a capelle	602
25		60
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Ha	up. Johnson	453
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C-11	la Corter :	315/317
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Northernor	La Douclot	516
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他,我<mark>是她,我她</mark>一点,就是一种的,一点,只是一点,我们就想要一点,一点,一点,一点,你们就是我们的,我们就是一点,你们也没有一点,我们就会不是<mark>是我们</mark>是这一

515-17 557-561 DAVIS FREMEN SARA STEFLE H. JACOBSEN #441 #85 # 7/1 #742 #966 #355 Kristine A. Reed Kiistine A. Reed JACK NENDER" Beera Me Breenela Meetins Linda J. Martinez #952 VIRGINIA CHARLES #60X #455-457/461 nothin Ed Coutchie 4354 Caron HAYS #758/762 ARAWE TURNER \$1110/1120 #708 anthous de BIEN #857 2961 458 462