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WWW.DLANC.COM

EMAIL: INFO@DLANC.COM

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Board of Fire Commissioners
Los Angeles Fire Department

Kristin M. Crowley
Fire Chief,
Los Angeles Fire Department

VIA EMAIL

RE: Mitigating Major Emergency Structure Fires in Downtown Los Angeles

To Whom It May Concern:

At our regularly held public meeting on November 12, 2024, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to provide the following comments below:

Downtown Los Angeles faces a critical challenge in managing fire risks inherent to its commercial and industrial landscape. The prevalence of high-density storage facilities, such as Pallet Yards and textile warehouses, along with the storage of hazardous materials, makes major fires increasingly inevitable. These conditions not only elevate the likelihood of large-scale fires but also create significant nuisances for residents and businesses, including smoke, pollution, and disruptions to daily life. The ramifications are severe: increased firefighter injuries, rapid fire spread to multiple structures, extensive property damage, and a profound impact on community safety and well-being.

LAFD's *Standards of Cover Analysis* report highlights that Battalion 1 fire stations serving Downtown are among the busiest in the city, catering to densely populated neighborhoods. The anticipated addition of 100,000 new housing units by 2040 will only put further strain on LAFD resources in both the emergency response and fire prevention areas if proactive measures are not taken.

To mitigate the risks associated with major fires, we propose the following recommendations:

- **Increase Preventative Inspections:** Implement additional preventative inspections and ensure the timeliness of mandated annual inspections by LAFD's *Industrial & Commercial Section Unit* and *Certified Unified Program Agency (CUPA) Unit* to address excessive storage practices and hazardous materials management in business and commercial occupancies before major incidents occur. Ensure locations that are out of compliance with CUPA's *CERS Hazardous Materials Submissions*, such as the 400 occupancies identified in DTLA¹, are brought into compliance or are referred out to the City Attorney's Office for appropriate action.

More frequent windshield surveys by fire companies and battalion command staff are crucial to identifying potential risks where gaps may exist from inspections or unpermitted uses not filed with the LAFD.

- **Enhance Coordination with relevant City Departments:** Establish better, clearer, and more regular standing coordination with relevant city departments such as the Department of Building and Safety (LADBS) and the Department of Cannabis Regulation to proactively address code violations and community concerns before they escalate. Work with the relevant AHJ's such as LADBS to address properties that have either been abandoned or are sites of routine *previous burns*, that serve as a major risk for firefighter safety and conflagration such as issues raised in [Council File 24-1128](#).

Additionally, create pathways for strategic partnerships via the LAFD's Community Liaison Office, Council Offices, and Neighborhood Councils to facilitate timely response to abate chronic issues within LAFD's jurisdiction.

- **Fully Staff Fire Inspector Positions:** Ensure the Fire Prevention Bureau (FPB) is fully staffed in LAFD's FY 25/26 budget request to the Mayor, particularly in the Industrial and Commercial Inspection sections, to effectively manage and monitor high-risk areas.
- **Request Formal Board Report:** Consider formally agendizing this matter as an *LAFD Project Status Report* to the Commission. Request the Fire Marshall, in consultation with the Chief Staff and relevant Bureau Commanders, report back on issues pertaining to the following:
 - LAFD responses/calls for service to unsecured and/or abandoned structures that are sites of multiple *previous burns*.
 - Non-compliant, delinquent, or outstanding code violations and/or *Notice of Violations* of Hazardous Materials, Fire/Life Safety, and excessive material storage of combustible items in high-risk occupancies.
 - Backlog of annual inspections with an emphasis towards high-risk occupancies

¹ CUPA Enforcement | Los Angeles Fire Department. (n.d.). <https://lafd.org/cupa-enforcement>

- Updates to the Los Angeles Municipal Code (LAMC) and relevant city ordinances to establish more effective and future-proof fee and fine recovery structures

The growing threat of devastating fires is impacting property owners' ability to secure commercial property and fire insurance, underscoring the urgent need for action.² With aging fire stations and a community under strain from such a wide span of industrial, commercial, and residential uses, we must prioritize fire prevention and resource allocation to protect the residents and businesses of Downtown Los Angeles.

DLANC calls on the Department and the Fire Commission to consider these recommendations as essential steps and advocacy toward ensuring the safety and resilience of our community.

Sincerely,



Claudia Oliveira
President,
DLANC



Debby Zhou
Chair,
DLANC Livability Committee

Cc:

Operations Central Bureau, Los Angeles Fire Department (via email)
Fire Prevention & Public Safety Bureau, Los Angeles Fire Department (via email)
Mayor's Office of Public Safety (via email)
Council District 14 (via email)
Council District 9 (via email)
Council District 1 (via email)
Fashion District Business Improvement District (via email)
Industrial District Business Improvement District (via email)

² Property Insurance Crisis Brings Mayor Bass, Commissioner Lara to. (2024, January 28). Downtown LA Industrial District BID. <https://industrialdistrictla.com/news/property-insurance-crisis-brings-mayor-bass-commissioner-lara-meeting-bid-stakeholders>