



# Fire Prevention Inspections of Legal and Illegal Cannabis Occupancies: A Comparative Study

## Poster Showcase #IAEM23

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### Introduction

The Los Angeles Fire Department's Cannabis Unit faces several challenges in overseeing compliance with fire and life safety regulations, chemical inventory, and permits for cannabis-related businesses. The issues include

- A lack of coordination between the Department of Cannabis Regulations (DCR) and other relevant departments issuing permits,
- Unpermitted operations by businesses, and non-compliance with safety regulations. These challenges pose significant risks to public safety and hinder the efficient regulation of the burgeoning cannabis industry.



The unit's structure includes supervision by a Battalion Chief, a Captain I, a Management Analyst, and three Inspector I positions.

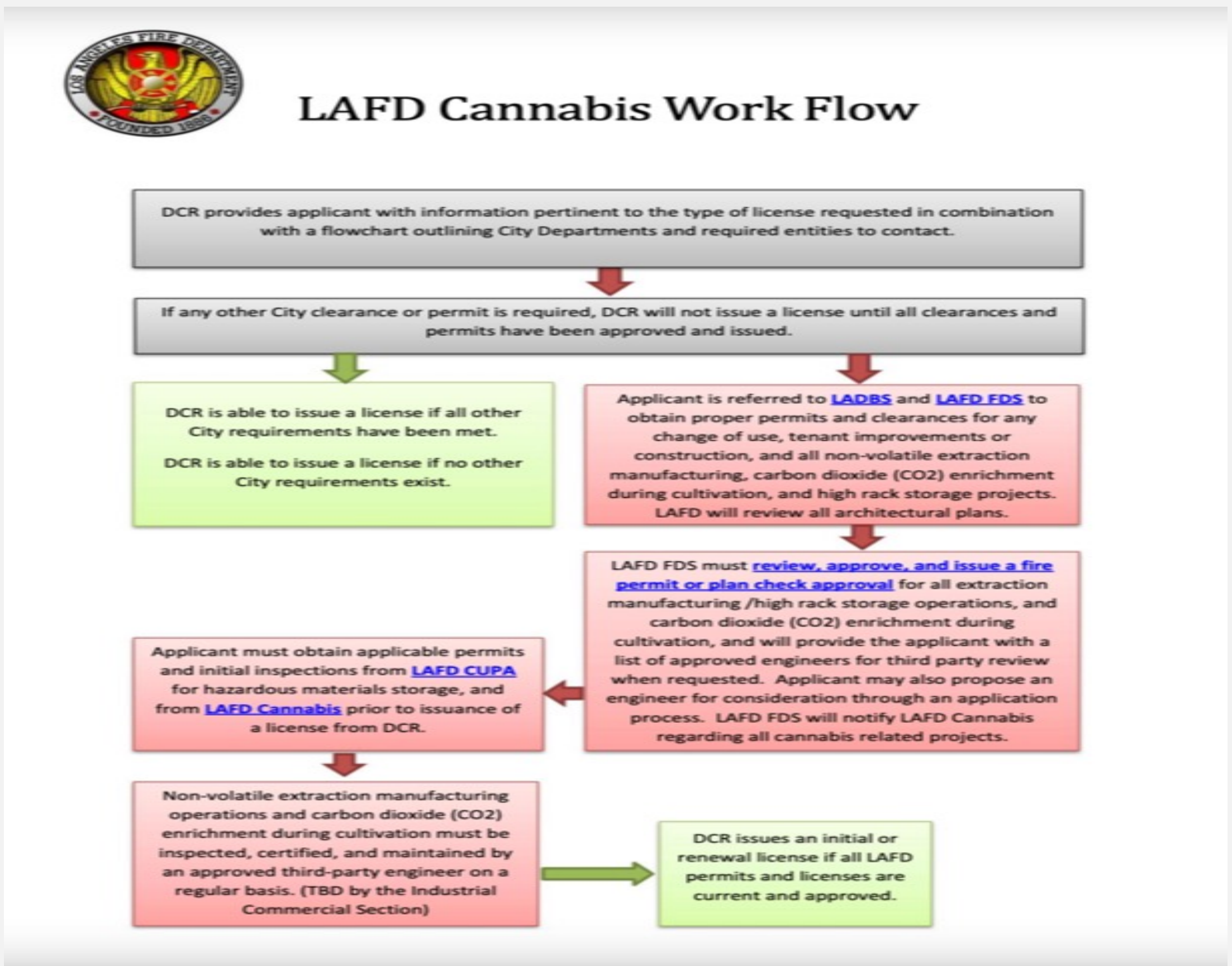
### Cannabis Licensing & Applicable Permits/ Plans

- **Cannabis License or Temporary Permit** issued by the **Department of Cannabis Regulation (DCR)**
- **Specific Action Permit** issued by the **Los Angeles Fire Department's Fire Development Services (FDS)** for extraction and gas enrichment appliances
- **Operational Permit** from the **Los Angeles Department of Building and Safety (LADBS)** for continuous use of such appliances.

- Additional Permits may include:**
- **Appliance Plan approval** from FDS
  - **Certified Unified Program Agency (CUPA) permit** for hazardous materials inventory
  - **Fire Safety Plan** required for all licensed cannabis occupancies.



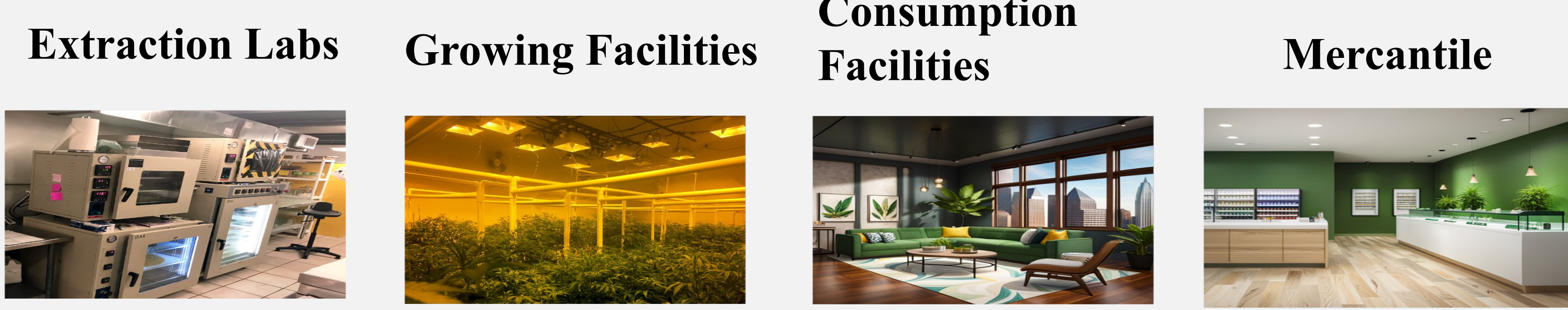
### Cannabis Licensure and Permitting Compliance



### Cannabis Occupancy Types

The hazards in an occupancy vary based on the types of activities being conducted, the types of materials being used, and the quantities of the materials. The most fundamental question when it comes to cannabis facilities is: **What is the occupancy classification?**

- Two of the riskiest types of occupancies in this sector are **extraction or conversion labs**, which use hazardous gases such as butane, isobutane, propane, pentane, ethanol and hexane in the conversion process, and **growth facilities**. Which include egress, lighting, combustible interior finishes, high electrical loads, fumigation & fertilization, illegal locks/barriers & CO<sub>2</sub> enrichment.
- These operations have been linked to volatile structure fires that can cause injuries or fatalities to responding firefighters and first responders.



### Licensing & Cannabis Unit Tracking

#### Los Angeles City Charter Sec. 22.1141. Licenses.

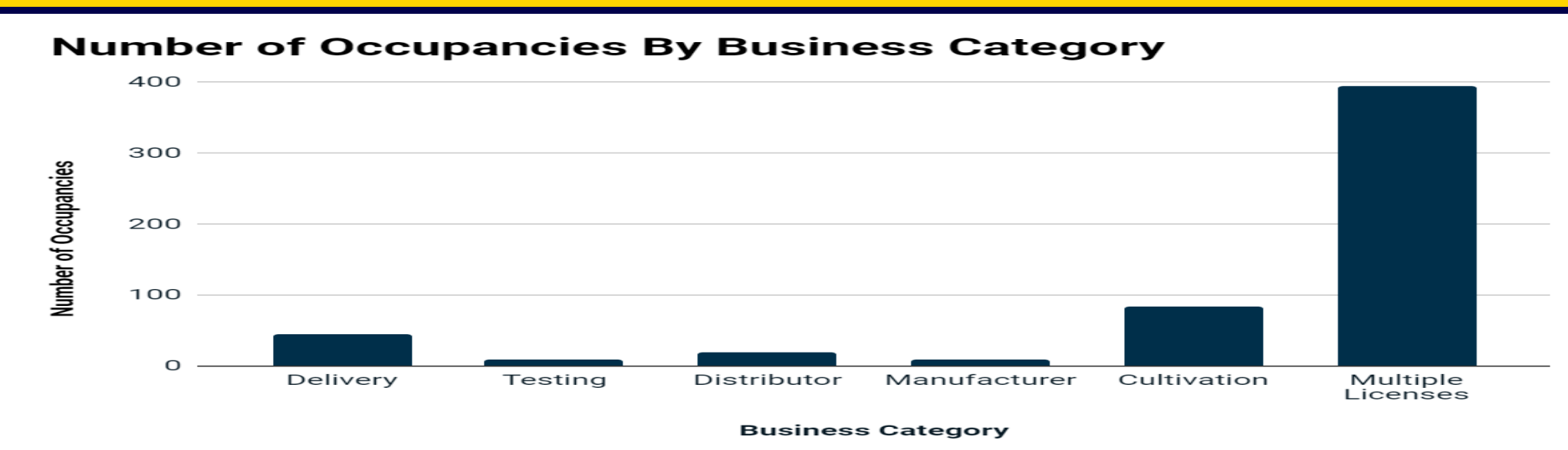
The Department shall administer an issuance of licenses for cannabis-related application process, in conjunction with the Cannabis Regulation Commission, for activity in the City.



**In 2018 The Los Angeles Fire Department began working with The DCR to track who was issued Licenses**



### Cannabis Tracking



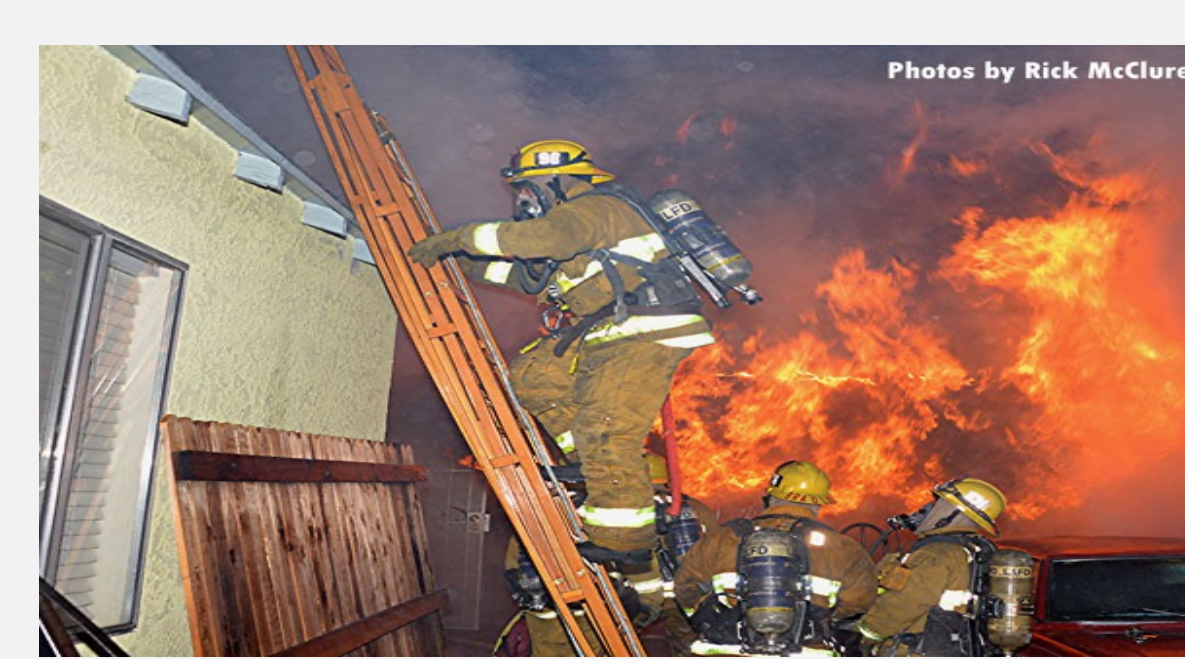
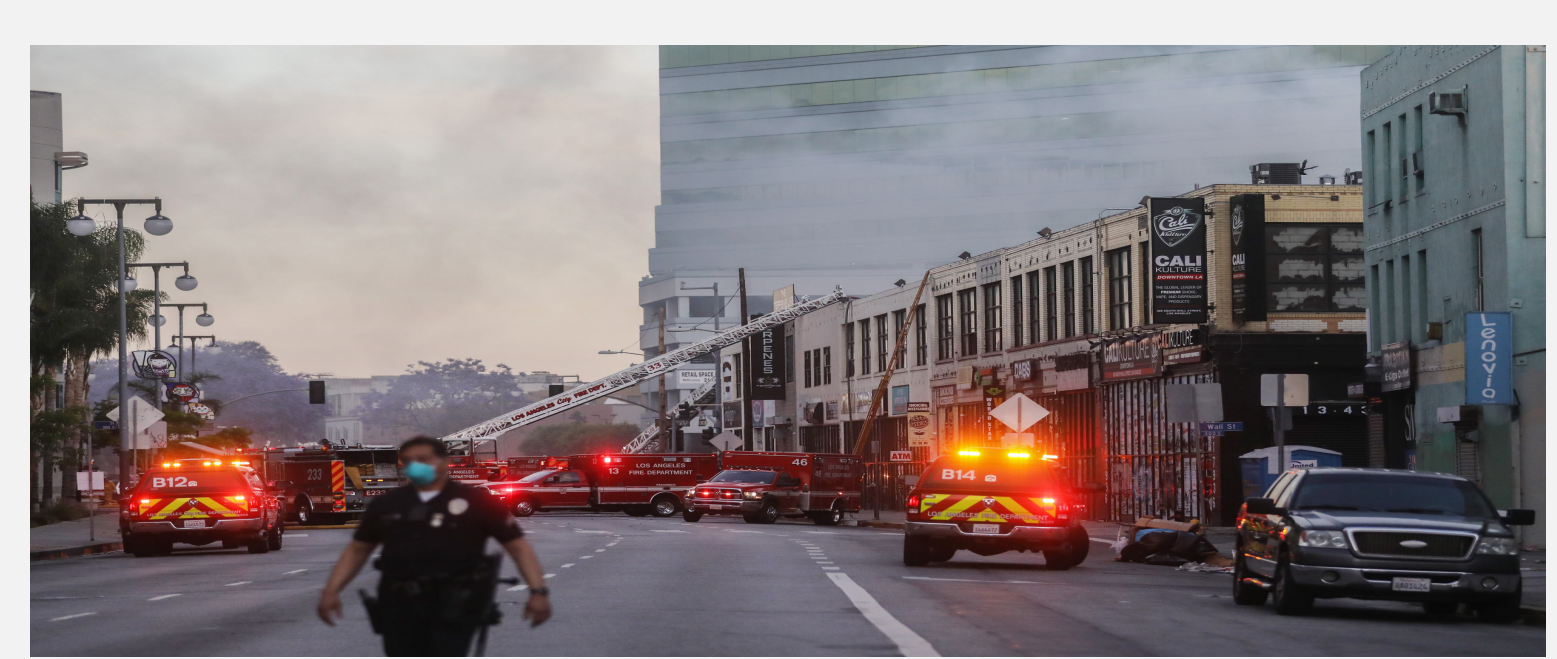
### Future Outlook

With the Department of Cannabis Regulation continuing to issue Temporary Approvals, Fire Inspectors employ a large number of man hours staying organized and in communication with business owners trying to get them in compliance; in addition to routine annual maintenance inspections. It would be helpful to have one Administrative Inspector position to assist with the liaison between the inspectors and multiple other agencies involved in the cannabis industry. It also would be beneficial to have two additional Fire Inspector I positions to keep up with the continually rising number of cannabis occupancies.

### Inspection Challenges

- Cannabis inspections requires training specific to the nature of the activities and building features involved.
- Onsite cannabis operators may violate the terms of their cannabis licensure.
- Licensed cannabis businesses are costly and sometimes cost prohibitive.
- The encountering of unscrupulous actions by operators toward unauthorized and dangerous business practices.
- DCR's failure to require business or license holders to obtain any of the required permits through LADBS, CUPA or FDS to operate legally.
- Businesses performing unlicensed and unpermitted tenant improvements on the buildings
- The creation of dangerous conditions for the public as well as for responding firefighters
- Because of the time and cost to obtain permits, discourages attempts by operators.
- Unpermitted improvements are a common violation that are attempted correction by a verbal or written notice of violation.
- **If DCR could ensure that businesses have their permits PRIOR to issuing licenses, it would be invaluable to the Cannabis Unit.**

### Cannabis Extraction and Growth Explosions



### Illegal Cannabis Enforcement

When compliance is not met, the LAFD's Legal Liaison Unit engages in the legal process and the matter is referred to the Office of the City Attorney for adjudication. Cooperation with the following agencies, including:

- Los Angeles Police Department**
- Los Angeles Department of Building and Safety**
- Los Angeles Department of Water and Power**

Serving warrants on non-permitted illegal cannabis operations. During these inspections, numerous Fire / Life Safety Violations are observed and photographed.