

City of Arcata  
City Council  
736 F Street  
Arcata, CA 95521  
Email: [citymgr@cityofarcata.org](mailto:citymgr@cityofarcata.org)

RE: Arcata Local Coastal Program (LCP) Update — Fire & Life Safety Capacity,  
Height/Intensity Limits, and Coastal Act Consistency

Dear City Council,

On behalf of the Arcata Fire Protection District (AFD), thank you for the opportunity to comment on the City's Draft Local Coastal Program (LCP) and Draft Coastal Zoning Ordinance (CZO). AFD provides all-risk fire, emergency medical, hazardous materials, and rescue services to about 37,000 residents across Arcata, McKinleyville, Bayside, Manila, and Jacoby Creek. We respond to more than 3,300 incidents per year, with only seven firefighters on duty across three stations at any time.

In 2025, the City of Arcata and AFD partnered to complete a Community Risk Assessment and Standards of Cover (SOC). This joint study provides the best available evidence of service gaps and needs. The SOC confirms that AFD cannot currently meet NFPA 1710 staffing requirements for mid-rise occupancies. Each station operates with only a two-person engine company, falling short of the NFPA benchmark of four. While 14 firefighters are required for a single-family dwelling, 25 for a garden apartment, and up to 38 for a high-rise residential building, AFD can field only seven at any given time. Neighboring mutual aid partners, apart from Humboldt Bay Fire, are almost entirely volunteer-based with varying staffing, apparatus, and training, making them unable to reliably fill this gap.

The SOC also highlights that Arcata's projected growth and increased density will exacerbate these challenges. It identifies needs for additional firefighters, aerial apparatus, modernized fire stations, and a multi-story training facility. Measure F provided critical baseline staffing but sunsets in 2030, underscoring the urgency of sustainable funding. In short, the City and AFD now share a clear, evidence-based understanding of fire service limitations.

Despite this, the Draft CZO authorizes building heights of 60 feet in Gateway zones and up to 70–80 feet in Coastal General Commercial zones, with exceptions that could bring some buildings close to 96 feet. Neither the Draft CZO nor Draft LCE requires analysis of whether AFD has the staffing, apparatus, or facilities to meet NFPA benchmarks for these building types. Hazard reports under Section 2.22 address fire in general terms but do not evaluate service adequacy, and Coastal Development Permit findings require “no detriment to public health and safety” without measurable, objective standards.

The LCP rightly requires development to minimize risk to life and property (Policy 7.2.1) and calls for site-specific hazard studies (Policy 7.2.4), but it does not yet incorporate the SOC findings into enforceable thresholds. Without such standards, the City risks adopting plans that may be unsafe and legally vulnerable. In *Humboldt Alliance for Responsible Planning v. California Coastal Commission* (2024), the Court held that sprinklers and hydrants are not a

substitute for “qualified, equipped, and available” firefighters. That reasoning applies equally here.

To correct these deficiencies and align land use decisions with the City’s own SOC findings, AFD respectfully requests the following:

- **Fire & Life Safety Capacity Analysis (FLSCA):** Require a Fire & Life Safety Capacity Analysis, as part of hazard reports under Section 2.22 (Coastal Hazards), for all projects above three stories or 39 feet.
- **Interim Height Limit:** Modify height tables in the CZO to impose a 39-foot maximum in the coastal zone until AFD has acquired the resources necessary to reach measurable objective standards for mid-rise suppression.
- **Public Services Concurrency:** Amend Coastal Development Permit findings to require explicit evidence of fire service adequacy based on AFD objective standards.
- **Fire Facilities Development Impact Fee:** Collaborate with AFD to establish a Fire Facilities Development Impact Fee, ensuring that new development contributes proportionally toward the staffing, apparatus, and facilities necessary to meet NFPA-based measurable objective standards. Since impact fee adoption requires City approval, AFD urges the City to actively support and implement this program as part of the LCP and CZO framework.

In short, the Draft LCP and CZO authorize building forms that cannot be safely served with today’s resources. Without amendments to incorporate measurable, objective NFPA-based standards, the City risks entitling development that may outpace the District’s ability to protect life, property, and coastal resources.

AFD urges the City to revise the documents accordingly before adoption. We look forward to working collaboratively with the City to ensure that future development is both safe and resilient.

We respectfully request that this letter and its attachments be included in the public hearing packets for the October 14 Planning Commission and October 15 City Council hearings.

Sincerely,

A handwritten signature in blue ink that reads "Jason K. Akama".

President, Board of Directors

Arcata Fire District