August 4, 2026

LOS ANGELES FIRE DEPARTMENT

JAIME E. MOORE
FIRE CHIEF

July 20, 2026

BOARD OF FIRE COMMISSIONERS
FILE NO. 26-040

TO: Board of Fire Commissioners

FROM: Jaime E. Moore, Fire Chief

SUBJECT: AMENDMENT TO RESTRUCTURE THE APSA CATEGORIES IN THE DEPARTMENT'S SCHEDULE OF COST OF SPECIAL SERVICES REPORT

FINAL ACTION:	______ Approved	______ Approved w/Corrections	______ Withdrawn
	______ Denied	______ Received & Filed	______ Other

SUMMARY

The Aboveground Petroleum Storage Act (APSA) Program, administered by the Los Angeles City Fire Department (LAFD) Certified Unified Program Agency (CUPA), regulates businesses within the City of Los Angeles that store petroleum in aboveground tanks. The program's primary purpose is to protect California's water resources and public safety by ensuring that facilities storing significant quantities of petroleum implement proper engineering controls, spill prevention measures, and regulatory compliance practices. This report recommends amending the APSA fee category structure to better align with regulatory activities, enhance transparency, and strengthen cost-recovery defensibility. The proposed change maintains fiscal neutrality, aligns with comparable CUPA programs statewide, and promotes equity by matching fee structure to facility complexity.

RECOMMENDATIONS

That the Board:

1. Approve the proposed APSA fee category structure (Page 3).

2. Transmit this report to the City Council and Mayor for consideration and approval.

3. Request that the Mayor and City Council direct the City Attorney to draft corresponding ordinances adding and/or amending provisions of the Fire Code, which are contained in the Los Angeles Municipal Code (LAMC), Chapter 5, Article 7.

FISCAL IMPACT
The proposed APSA fee category restructuring has no fiscal impact and maintains full revenue neutrality. The restructuring improves alignment between fee classifications and regulatory workload drivers, enhances transparency, strengthens cost-recovery defensibility, and improves tracking and reporting efficiency.

DISCUSSION
The LAFD CUPA is mandated by the State of California to implement six Unified Program elements. This report proposes a revised fee category structure for one of those elements, the Aboveground Petroleum Storage Act (APSA) program, which regulates facilities that store petroleum in aboveground tanks.

The existing APSA program fee categories listed in LAMC Section 57.120.6 no longer reflect current regulatory activities or workload characteristics, including inspection frequency, facility complexity, and petroleum storage capacity. To better align with current regulatory requirements and improve transparency for regulated facilities, this report proposes a new fee category structure.

The proposed structure is intended to enhance billing, tracking, and reporting efficiency, particularly as facilities increase or decrease storage capacity and move in or out of the program. Additionally, the revised framework strengthens the defensibility of cost recovery in response to increasing facility complexity, higher technical expertise requirements, and the expanded time commitment required for oversight activities.

Furthermore, the new fee structure aligns the APSA program with comparable CUPAs, more specifically the Los Angeles County Fire Department CUPA (LACoCUPA) and Contra Costa County CUPA. These CUPAs use a facility's petroleum storage capacity as the primary and sole metric for determining the appropriate fee category, recognizing that increased storage volume corresponds to greater operational complexity and expanded compliance oversight requirements. Both CUPAs have implemented and currently utilize six fee categories based on storage capacity, which is the same framework proposed in this report. Aligning with this established model promotes consistency with peer agencies, reinforces the credibility of the methodology as a best practice, and reduces confusion for regulated businesses operating across multiple jurisdictions.

The new fee structure to be included in the Schedule adopted under LAMC Section 57.120.6 will be as follows:

Current Code	Proposed Code	Current Category	Proposed Category by Storage Volume Capacity (gallons)
3002	3004	Tank in an underground area	Less than 10,000 gallons
3003		Greater than 1,320 gallons but less than 10,000 gallons	
3001	3005	10,000 gallons or more	10,000 to < 100,000 gallons
3001	3006	10,000 gallons or more	100,000 to < 1 million gallons
3001	3007	10,000 gallons or more	1 million to < 10 million gallons
3001	3008	10,000 gallons or more	10 million to < 100 million gallons
3001	3009	10,000 gallons or more	100 million gallons or more

CONCLUSION
The proposed restructuring of the APSA program fee categories is necessary to ensure that the LAFD CUPA maintains a fee structure that accurately reflects current regulatory responsibilities, workload demands, and oversight requirements. The revised storage capacity framework improves administrative efficiency, enhances transparency, and strengthens the defensibility of cost recovery. By aligning with established models used by comparable CUPAs, the restructure promotes consistency and reduces confusion for regulated businesses.

Board report prepared by Royce Long, CUPA Program Manager, Fire Prevention and Public Safety Bureau.