


FROM	NAME & TITLE	Niles R. Ford, PhD, Chief of Fire Department <i>NEP</i>	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Baltimore City Fire Department 401 East Fayette St. 21202		
	SUBJECT	City Council Bill #17-0102 Response to Complete Streets		

TO The Honorable Bernard C. Young, President
And All Members of the Baltimore City Council
City Hall, Room 408

DATE: April 2, 2018

FOR the purpose of requiring the Transportation Department to construct and operate a comprehensive Complete Streets Transportation System; creating a Complete Streets Coordinating Council to make certain recommendations and oversee certain activities regarding the Complete Streets Transportation System; establishing certain design standards and requiring the Transportation Department to use the latest and best design2 standards in constructing and operating the Complete Streets Transportation System; requiring the Transportation Department, in consultation with the Coordinating Council and after public notice and a public comment period, to adopt a Complete Streets Manual to carry out this Ordinance; requiring that the Transportation Director, in consultation with the Coordinating Council, to prepare an Annual Complete Streets Report, assessing the status of the Complete Streets Transportation System, and to conduct public meetings and other community engagement and outreach activities to present the Complete Streets Annual Report to the public and to solicit input; specifying that the requirements of this Ordinance apply to all project phases undertaken by, under the authority of, or subject to the supervision of the Transportation Department for the improvement of any street, subject to certain exceptions; defining certain terms; providing for special effective dates; and generally relating to the construction and operation of a transportation system, accommodating all travel modes, that ensures the safety, security, comfort, and convenience of all users.

The Baltimore City Fire Department (“BCFD” or the “Fire Department”) supports initiatives that seek to improve the quality of life for all Baltimore City residents and visitors, and generally is in support of the concept of Complete Streets. However, the Department has a few concerns about the current version of Bill 17-0102.

First, with any ordinance or bill that relates to City streets, BCFD needs to ensure that any actions taken with respect to streets also will comply with the International Fire Code, 2015 edition (“Fire Code”), which has been adopted by the Mayor and City Council of Baltimore for fire code compliance to safeguard life and property.

The Fire Department has concerns with any part of the bill that authorizes street designs that would violate the Fire Code. For instance, Appendix D of the Fire Code, in part, delineates the necessary access (to facilities, buildings or portions of buildings) and minimum specifications that are required for fire apparatus access roads. By way of example, but without limitation, Appendix D of the Fire Code provides that “[w]here a fire hydrant is located on a fire apparatus

access road, the minimum road width shall be 26 feet (7925 mm), exclusive of shoulders.” As another example, Appendix D also provides that “[a]erial fire apparatus access roads shall have a minimum unobstructed width of 26 feet (7925 mm), exclusive of shoulders, in the immediate vicinity of the building or portion thereof.” It is the Fire Department’s position that any Complete Streets ordinance must allow for compliance with the Fire Code to ensure that these and other requisite safety standards are met.

In addition, we recommend that the Chief of the Fire Department (or his/her designee) be included as a member of the Complete Streets Coordinating Council that would be created by this bill. This is in accordance with recommendations of Complete Streets advocates. For instance, the Active Transportation Alliance’s “Complete Streets Complete Networks: A Manual for the Design of Active Transportation” advises that “[f]ire professionals, police and ambulance services are key stakeholders in the implementation of Complete Streets policy and should be included in all review processes. They can provide unique perspective on the uses and demands of corridors in the areas they serve.” This Manual also is included on the website of the National Association of City Transportation Officials. The Fire Department should be included in the planning process on the front end of Complete Streets projects, to avoid any potential issues related to the Fire Code that may become clear after projects are initiated or finalized. If involved in the Coordinating Council, the Fire Department would thus be able to make suggestions related to proposed Complete Streets projects that would help avoid Fire Code issues in the long run.