



November 17, 2022

To the Colorado Springs Fire Department,

Much time and care has been put into the proposed amendments to the 2021 International Fire Code up for consideration to be adopted by the Colorado Springs Fire Department, so we want to thank and commend this effort as it will provide a more locally tuned version of the code that aims to provide better safety, as well as allowing local construction and development to continue using methods more common to this jurisdiction.

Select Colorado Springs area members of AIA Colorado have reviewed the proposed amendments to the 2021 IFC, and they have found them to be appropriate for adoption by the Colorado Springs Fire Department area of jurisdiction. Our members have identified the following areas where refinements would benefit users of the code and are listed below:

1. Section 324: Please clarify that this only applies to "super charging" stations that run off 480V power, but not lower classes of charging stations.
2. Section 324.7, Item 2: We recommend changing this text to state: "where the floor is located more than 1 story below the lowest level of exit discharge". An open parking garage that is 60% below grade would otherwise be considered below the lowest level of exit discharge even though it could be constructed as an open parking garage as defined in building codes.
3. Chapter 33 Fire Safety: During construction & demolition, we recommend the required fire safety plan not be a part of the building plan review, but rather as part of a construction team plan either at the time of pulling the permit, before first building inspection, or other method that will not be tied to obtaining building plan review approvals. Jobsite safety plans are beyond the scope of the practice of architecture and often the construction team is not under contract when construction documents are submitted for review. This change would ensure that the general contractor responsible for job site safety will be involved.

The above items are recommendations from AIA Colorado members, however if not implemented and the amendments are adopted as currently proposed, there isn't strong member opposition. AIA Colorado is in support of the proposed CSFD amendments to the 2021 IFC for code adoption.

Sincerely,  
Nikolaus Remus, AIA  
Advocacy Engagement Director