



Staff Report

PLANNING DIVISION
DEPARTMENT of COMMUNITY and NEIGHBORHOODS

To: Salt Lake City Planning Commission

From: Nick Norris, Planning Director
nick.norris@slcgov.com
801-535-6173

Date: February 12, 2020

Re: PLNPCM2019-00938

Amendments to Chapter 18.44 Fire Prevention and International Fire Code (IFC)

MASTER PLAN: City Wide

ZONING DISTRICT: All zoning districts that allow building heights in excess of 30 feet

REQUEST: A proposal to modify City Code chapter 18.44.020 "Amendments" to add alternatives to the proximity to building requirements found in Appendix D section 503.1 of the International Fire Code ("IFC") as adopted by the Salt Lake City Council. Utah Code adopts the fire code but allows local governments to determine the applicability of each Appendix.

RECOMMENDATION: Based on the information in this staff report, Planning Staff recommends that the Planning Commission forward a positive recommendation to the City Council regarding this proposal.

ATTACHMENTS:

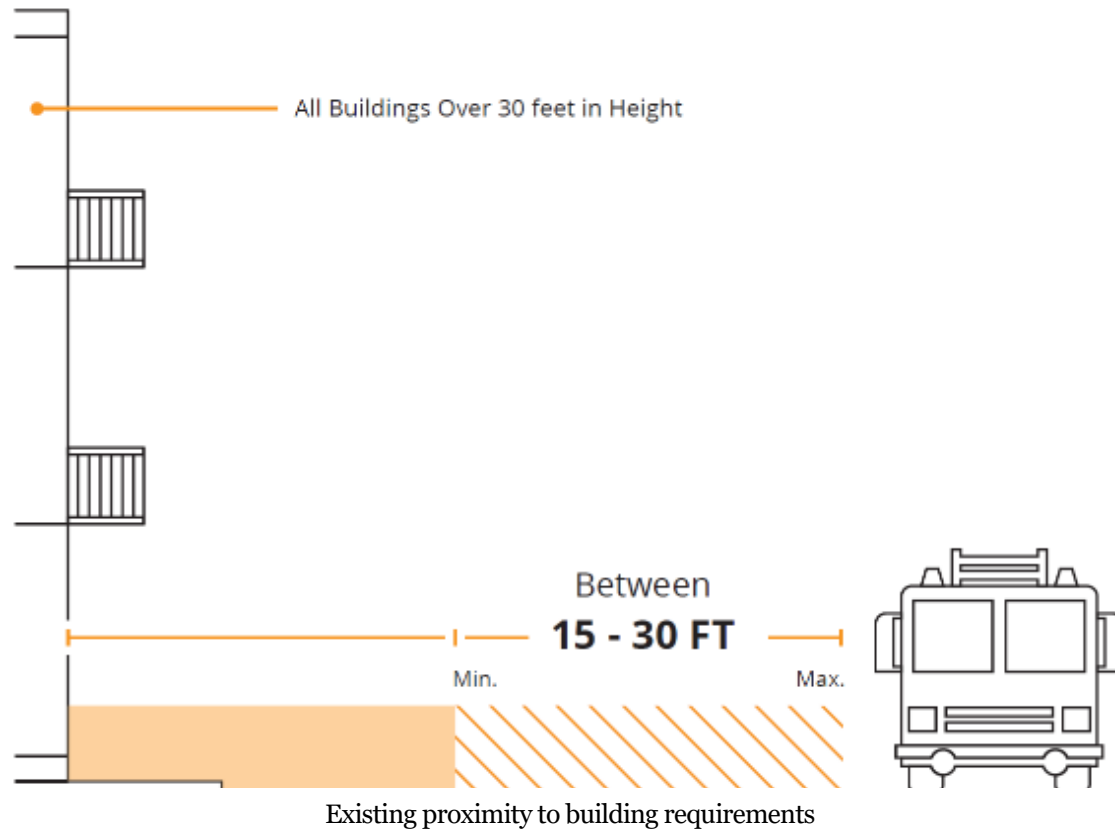
- A. Proposed changes to Chapter 18.44 Fire Prevention and International Fire Code
- B. Master Plan Policies
- C. Department Review Comments
- D. Public Input

PROJECT DESCRIPTION:

This proposal is intended to provide some flexibility for the Salt Lake City Fire Department in administering the International Fire Code Appendix D, section 503.1 "proximity to building." This section of the IFC determines the distance range that an aerial fire access road can be from a building. It applies to new construction and major additions. The existing regulations have limited developers' ability to construct buildings over 30 feet in height in various locations due to the constrictive access requirements.

The existing requirements state that an aerial fire access road can be no closer than fifteen feet and no further than thirty feet from an entire side of the building that is over 30 feet in height:

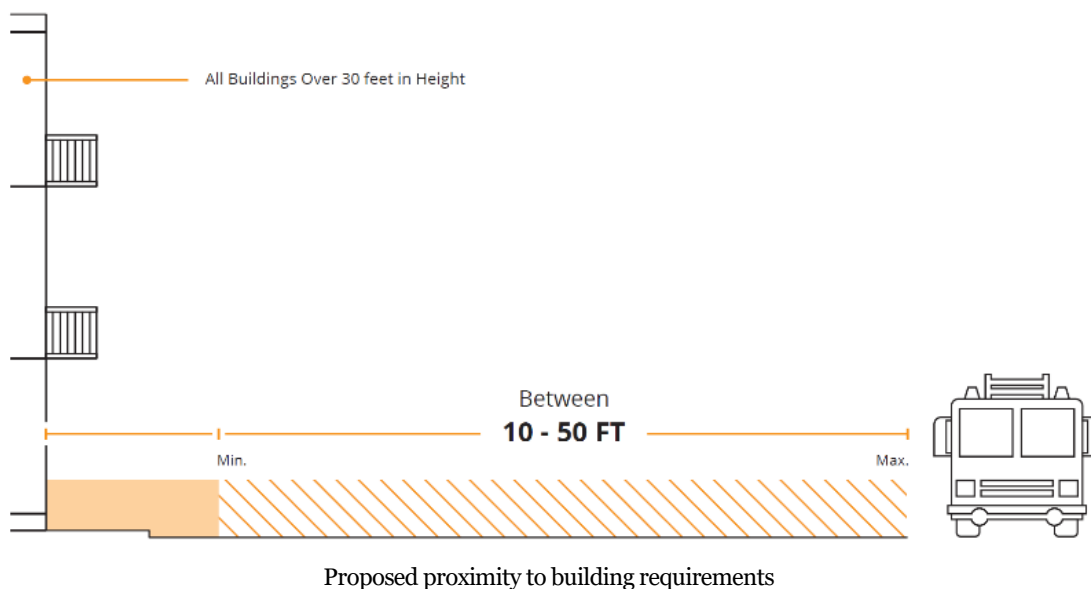
D105.3 Proximity to building. At least one of the required access routes meeting this condition shall be located within a minimum of 15 feet (4572 mm) and a maximum of 30 feet (9144 mm) from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official.



The existing code would remain in place and property owners would be able to use the existing code to comply with aerial access requirements.

The proposed changes would create an optional path to use the public rights of way for aerial access. This option would allow a reduction in how close the aerial fire road can be to the building from fifteen feet to ten feet and allow the maximum distance the road can be from the building to increase from thirty feet up to fifty feet if the building includes increased fire safety construction features. In order to be eligible for the relaxed access road requirements under the proposed amendments, a building must include at least one of the following features:

1. The structure is a Type I (tall buildings made with concrete or steel) or Type II (typically new or remodeled commercial buildings where the walls and ceiling are noncombustible materials) as defined in the International Building Code;
2. Stairwells and common corridors have a two-hour fire rating;
3. The structure has a compartmentalized design that includes two-hour fire walls that extend from the ground to the roof, automatic smoke detectors, and areas of safe refuge;
4. The structure provides enhanced smoke detection in addition to fire sprinkler systems. This includes detection systems in all corridors and common spaces that are connected to the fire alarm panel;
5. The aerial fire apparatus road(s) are positioned parallel to the entire long axis side of the building; or
6. Buildings with a total height ranging from 30 to 75 feet in height have an enclosed stairway(s) equipped with a pressurized air system.



It is important to note that only one of the options would have to be included in order to decrease or increase the proximity to building requirements. Buildings that are within the existing proximity range (between 15 and 30 feet), would not have to include any of the additional requirements. The proposed modification would only apply to buildings that are located either closer than fifteen feet or further than thirty feet from the aerial access road.

KEY ISSUES:

The key issues listed below have been identified through (i) the analysis of the project, (ii) neighbor and community input, and (iii) department review comments.

Impact on City Goals

The existing proximity requirement is a barrier to implementing adopted master plan policies. Most of the master plan policies that the City has adopted related to growth promote mixed use development, affordable and accessible housing, economic development, and the enhancement and improvement of public spaces. The

development goals of the City are outlined in Plan Salt Lake through several guiding principles and key initiatives. The City's ability to achieve these goals has been negatively impacted by the fact that only about 8% of the land can be used for multi-family dwellings and only about 6.5% of the land can include mixed use development. This negative impact is primarily due to other city goals, such as protecting City Creek Canyon as a water shed and natural area, prohibiting development of the upper foothills open space areas and the impacts the location of the airport has on residential development west of I-215. This fact increases the importance of maximizing the use of the remaining land in the City to accomplish these goals. The current proximity to building requirement in the fire code described above prevents thousands of properties from being used for mixed use development over thirty feet in height without costly and unnecessary changes to the existing rights of way or the construction of expensive fire access roads.

The proposed changes remove the barriers to achieving City goals by making it easier for desirable development to occur. Without the changes, the streets become less safe for people, there are less public spaces for people to interact, unnecessary expenses are added to the cost of housing, and the City becomes more auto oriented.

Many master plan goals are dependent on and implemented by the private sector through the development process. New housing, office buildings, restaurants, and stores are usually funded, designed, and built by the private sector. When the existing streets cannot be used to satisfy the aerial access requirements, the necessary access is created in one of two ways: (i) it is located on private property through the use of wide driveways, or (ii) the curb line in the city street is moved closer to the property line, effectively widening the paved area of the street.

When the aerial access road is built on private property, other fire code requirements are triggered. The road itself has to be a minimum of twenty-six feet wide. The aerial access requirements also require at least fifteen feet between the road and the building, which results in a minimum overall access requirement of forty-one feet. This creates a barrier on narrower lots because the aerial access requirement takes up a high percentage of the width of the lot. For example, a 100 foot-wide lot would have to dedicate 41% of the lot width to satisfy the aerial access requirement. When a property owner is not able to have an economic return on a high percentage of their property, the remainder of the property has to generate enough revenue to offset the portion of the property that does not generate income. This increases the cost per square foot of the building, whether it is for commercial or residential uses.

When the land is not able to provide an economic return for the owner, the likelihood of a property being redeveloped decreases. With a finite amount of land available for housing in Salt Lake City due to zoning restrictions and other factors, this further limits the amount of land where housing can be built. In turn, it makes it difficult to provide enough new housing to match the increase in new households. This pushes housing to other parts of the region and does not lower or even stabilize the housing costs within the City. When the housing costs cannot be stabilized and the rate of increase slowed, the City cannot achieve its housing goals outlined in Plan Salt Lake, Growing SLC, or any of the Community Master Plans.

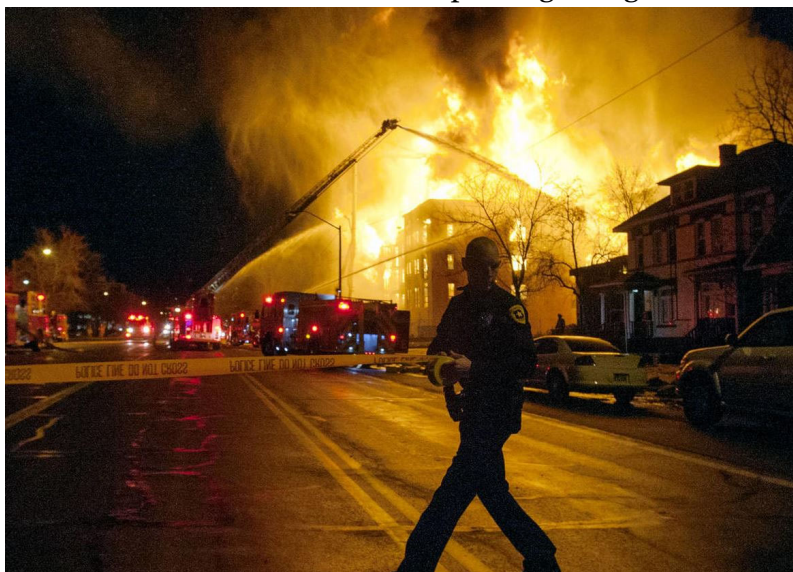
When the curb line is relocated to provide the aerial fire access, the effective and perceived width of the street is increased because the space allocated for cars increases while the space allocated for people and landscaping decreases. This approach

fundamentally changes the streetscape to a more automobile oriented emphasis. In locations where the property line is already more than thirty feet from the curb, 45% or more of the width is dedicated for things other than the automobile. This is a key metric for walkability and may be one of the most important factors the City can use to promote more walking and biking. The wide park strips allow for wider sidewalks, more green space and planting areas for trees, more places for outdoor dining and seating, and more options for bicycle lanes that are separated from the vehicle travel lanes in the street. However, when the curb is relocated closer to the property line, all of these things are degraded and more of the street width is dedicated to automobiles.

Reducing the width of the park strip reduces the options the city has for street trees, bike lanes, utility locations, curb management, storm drainage and other public needs. This proposal maintains the options for the space between the curb and property lines. A key component of this proposal is that it also eliminates the ability of a property owner to ask that the curb be relocated for the purpose of complying with the proximity to building requirements of the fire code.

Public Safety

The primary concern when this change was considered was the potential impact to public safety. According to the Fire Department, this proposal does not negatively impact public safety in emergency response situations because the additional required building features result in a safer building and facilitate an effective response from the Fire Department in the event of an emergency. Buildings constructed under the proposed changes would have a higher level of fire security, and the fire fighters and equipment will not be placed within the collapse zone of buildings that are engulfed in flames. The collapse zone of a building is an important factor in the proposal. The current code could require a private aerial access road to be built on private property within the collapse zone. For instance, if a building is over thirty feet in height, the collapse zone is essentially thirty feet away from the building. The taller the building, the larger the collapse zone becomes. A seven-story building (approximately 75 feet in height) could completely bury a fire truck if the fire truck was parked within the code required distances. The key consideration with this is that the responding fire fighters are not likely going to position



a fire truck in a location where the building could collapse on the vehicle and the fire fighters. The picture on this page demonstrates the spacing of fire trucks when responding to large fires. The four-story building in the picture sits thirty-five from the curb line. The fire truck with the extended ladder is parked in the center turn lane,

Photo by Scott G Winterton, Deseret News ©

about sixty-five from the building. The vehicle is not within the collapse zone of the building.

The proposal also maintains the existing safety of city streets because the ability to relocate the curb, effectively widening the street, would no longer be an option.

Safety of Building Occupants

The occupants of buildings that may be constructed under the proposed code would not be impacted. This is because the building would contain other safety features based on the option that is selected by the developer. If the construction type is one that is considered more fire resistant, such as steel and concrete construction, the occupants have less fire risk because the structure itself is less prone to fire (even though the building furnishings and finishes may still burn). If other enhanced fire safety features are added, such as increasing the corridors to a two-hour fire rating, building occupants may have more time to evacuate a building if a fire were to occur within the building.

Impact to Staff Workloads

Under the current proximity to building requirements, the Fire Department is routinely asked to consider alternatives to building an aerial access road. This request, called an “alternative means and methods” in the fire code, triggers reviews by multiple city departments and divisions, particularly to Community and Neighborhoods. Building Services coordinates building permit reviews and the fire code review is done within this Division. However, the alternative means and method has to be approved by the Fire Prevention Bureau of the Fire Department. The Engineering Division is required to review the proposed changes to the city infrastructure to make sure it will still function with the change. The Transportation Division reviews the impact to the circulation systems, include transit, the bicycle network, and pedestrian ways. The Planning Division is required to determine if the proposal complies with the master plan policies for the area as well as the zoning ordinance and subdivision regulations. Public Utilities and Public Services are also involved in the review.

This proposal would reduce this workload because it establishes an adopted and acceptable alternative to relocating a curb line. This reduces the amount of time city staff would spend reviewing the proposal, which in turn reduces the amount of time it takes to have an alternative approved. This frees up staff time for other duties and decreases the amount of time it takes to get a building permit.

Additional Information:

This proposed change was initiated because of the impact that the existing regulation has had on the built environment and the barriers to implementing adopted master plan policies that the regulations are creating. Due to the limitations placed on the City by the State Code provisions that adopt the International Fire Code, the proposal is narrow in scope and intended to address the specific problem.

City Code chapter 18.44 Fire Prevention and International Fire Code is the chapter of City Code where references to the International Fire Code are located. State Code requires cities to adopt the International Fire Code but provides cities with the option of adopting one or more of the IFC appendixes. Salt Lake City has adopted appendix D of the IFC, which contains the proximity to building requirements. In making the proposed change related to language in an IFC appendix, the

City has to determine whether the change impermissibly changes core provisions of the International Fire Code (i.e. those IFC provisions expressly adopted by the State) or if the contemplated changes impact other chapters of the IFC. This proposal is not impermissibly restrictive because it expands the options for complying with the proximity requirements in a way that does not violate or otherwise invalidate any of the core provisions of the International Fire Code. Applicants can always comply with the existing IFC regulations adopted by the State without having to do anything that is found in the proposed amendment. None of the other IFC provisions adopted by the State are impacted by the proposal and all such IFC provisions would still apply.

There are no specific standards for considering code changes found within Title 18 Building and Construction as there are with changes to the zoning ordinance. Title 18 is a technical chapter that identifies which construction codes apply, who administers the codes, the process for obtaining building permits, and the process for appealing interpretations of the building code. The Planning Division is not involved in the administration of Title 18. However, the Planning Division identified the issues that the proximity to building requirements were creating and were asked to work with the Fire Department to figure out a solution to those issues.

Under Utah Code, any regulation that impacts the construction or development of property is considered a land use code. Land use codes are required to be reviewed by the Planning Commission with a recommendation to the City Council prior to the City Council adopting any changes. Therefore, the Planning Division is asking the Planning Commission to make a recommendation to the City Council on this issue.

NEXT STEPS:

The Planning Commission has several options with this proposal. The Commission can forward a recommendation to the council that the proposal be adopted, recommend that the proposal not be adopted, or propose modifications to the proposal. Any recommendation should be based on the information presented or contained in the staff report, the comments received by the public and city departments, and the applicable master plan goals of the city.

ATTACHMENT A: Proposed Changes to Chapter 18.44

18.44.010: INTERNATIONAL FIRE CODE AND STANDARDS ADOPTED:

The edition of the international fire code as adopted by section 53-7-106, Utah Code Annotated, or its successor section is adopted by Salt Lake City as the fire code ordinance, rules and regulations of the city. Appendices A, B, C, D, E, F, G of the international fire code are specifically adopted by Salt Lake City as part of the fire code of the city. Hereafter, all references in this code to the fire code shall mean the edition adopted by section 53-7-106, Utah Code Annotated, or its successor section, together with its appendices. One copy of the international fire code shall be filed for use and examination by the public in the office of the city recorder. (Ord. 68-02 § 1, 2002)

18.44.020: AMENDMENTS:

Section 109.3 of the international fire code is amended to read as follows:

109.3. Violation Penalties. Upon conviction for such violations of this chapter, the person(s) or entity(ies) shall be punishable as provided by title 1, chapter 1.12 of the city code. Each day that a violation continues after due notice has been served shall be deemed a separate offense.

Section 27.03.3.1 of the international fire code is amended to read as follows:

27.03.3.1. Unauthorized Discharges. When hazardous materials are released in quantities reportable under federal, state, or local regulations, the fire department shall be notified without delay, and the following procedures are required in accordance with section 27.03.3.1.1 through 27.03.3.1.4.

Section 305.5 of the international fire code is amended to read as follows:

305.5. Hazardous Environmental Conditions. When the fire code official determines that hazardous environmental conditions necessitate controlled use of any ignition sources, including fireworks, lighters, matches and smoking materials, the ignition or use of such ignition sources in mountainous, brush-covered or forest-covered areas or other designated areas is prohibited except in approved designated areas.

Section 901.6.2 of the international fire code is amended to read as follows:

901.6.2. Records of all system inspections, tests, and maintenance required by the referenced standards shall be maintained on the premises for a minimum of three years and shall be provided to the Salt Lake City fire bureau through a third party inspection reporting system. Said third party inspection reporting system may charge a fee to users in an amount not to exceed \$10.00 per inspection.

Section 1104.16.5.1 of the international fire code is amended to read as follows:

1104.16.5.1. Examination. Fire escape stairs and balconies shall be examined for structural adequacy and safety in accordance with section 1104.16.5 by a registered design professional or other acceptable to the fire code official every five years, or as required by the fire code official. An inspection report shall be submitted to the fire code official via its established third party inspection reporting system. Said third party

inspection reporting system may charge a fee to users in an amount not to exceed \$10.00 per inspection.

Appendix section D 105.3 Proximity to building of the international fire code is amended to read as follows:

D105.3 Proximity to building. At least one of the required access routes meeting this condition shall be located within a minimum of fifteen (15) feet (4572 mm) and a maximum of thirty (30) feet (9144 mm) from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official.

The fire code official is authorized to adjust the dimensions above to a minimum of ten (10) feet and a maximum of fifty (50) feet from the building if one or more of the following conditions occur:

- A. The structure is either Type I or Type II construction
- B. Stairwells and common corridors have a two hour fire rating
- C. The structure has a compartmentalized design. This includes two hour fire walls that extend from the ground to the roof, automatic smoke doors, areas of safe refuge, etc.
- D. Projects provide enhanced smoke detection in addition to fire sprinkler systems. This includes smoke detection systems in all corridors and common spaces that are connected to the fire alarm panel.
- E. The aerial fire apparatus access roads are positioned parallel to one entire long axis side of the building.
- F. Buildings with a total height ranging from thirty (30) feet and seventy-five (75) feet will have enclosed stairways equipped with a pressurized-air system.

Any exception to this section may be accepted or denied by the fire code official based on site specific conditions. Existing curb lines shall not be relocated in a manner that reduces the park strip or sidewalk of the existing, public rights of way to comply with the proximity of building requirements.

ATTACHMENT B: Master Plan Policies

MASTER PLAN POLCIES

Salt Lake City (“City”) has adopted a citywide vision document called Plan Salt Lake that sets the direction for growth and development of the City. Plan Salt Lake is organized into Guiding Principles with each guiding principle containing a number of initiatives. These Guiding Principles and Initiatives should be considered for all text amendments, particularly with proposals such as this that are technical in nature and difficult to tie directly to specific community master plan policies. The applicable Guiding Principles and associated initiatives are discussed below.

Guiding Principle 1: Neighborhoods that provide a safe environment, opportunity for social interaction and services needed for the wellbeing of the community therein.

The purpose of this proposal is to remove a barrier to development in neighborhoods where buildings over thirty feet in height are allowed or will be allowed as the City continues to have discussions about managing growth. Building scale (initiative 1) is a component of neighborhood character and maintaining that character is part of this proposal because it allows the already dense neighborhoods of the City to maintain the taller scale of buildings and provides more opportunity for residential development. Initiative 10 states “improve the usefulness of public rights-of-way as usable public spaces. This proposal eliminates the option of narrowing park strips and allocating more space to vehicles.

Guiding Principle 2 “Growth” states that the City should “Grow responsibly, while providing people with choices about where they live, how they live, and how they get around.” This proposal relates to this by removing barriers to development in areas of the City where taller buildings are allowed. This relieves pressure that is created by the limited amount of land in the City that is available for residential development, particularly mixed use development and multi-family housing. Initiatives that are supported by this proposal include:

- Initiative 1: locate new development in areas with existing infrastructure and amenities, such as transit and transportation corridors.
- Initiative 2: encourage a mix of land uses
- Initiative 3: promote infill and redevelopment of underutilized land.

Guiding Principle 3 Housing directs the City to provide “access to a wide variety of housing types for all income levels throughout the city, providing the basic human need of safety and responding to changing demographics.” Salt Lake City is experiencing one of its largest periods of growth in its history and the region has added more households than housing units over the last few years according to the Kem C Gardner Policy Institute in a report titled “Salt Lake and Utah County Subcounty Estimates, 2010-2018.” Even with the high level of growth, not enough housing units have been added to the City to support that growth and more housing units are needed. This “proximity to building” requirement has impacted multiple housing developments located in areas that are already zoned for high density. The impact has stopped some projects from being built and has added unnecessary expense to others. Addressing this issue through this proposal supports the following Housing Initiatives in Plan Salt Lake:

1. Ensure access to affordable housing citywide (including rental and very low income).
2. Increase the number of medium density housing types and options
3. Encourage housing options that accommodate aging in place
4. Direct new growth toward areas with existing infrastructure and services that have the potential to be people oriented.
7. Promote high density residential in areas served by transit.

Guiding Principle 4 Transportation and Mobility addresses how people move within the City. A number of initiatives relate to the proposal, specifically the portion of the proposal that prohibits changes to the curb line, park strips, and sidewalks in order to comply with the fire code. This allows the City to at least maintain the amount of space in the rights of way dedicated toward people instead of vehicles and maintains options for adding people oriented amenities to our streets. Initiatives that are furthered by this proposal include:

5. Make walking and cycling viable, safe, and convenient transportation options in all areas of the City.
6. Prioritize maintenance of existing infrastructure (enhancing quality of life, safety, Sustainability, and mobility)
7. Encourage transit oriented development.
10. Enhance rights-of-way to join, rather than segregate, adjacent neighborhoods.
11. Incorporate green infrastructure into our rights of way and transportation network.
12. Incorporate pedestrian oriented elements, including street trees, pedestrian scale lighting, signage, and embedded art into our rights-of-way and transportation networks.

Guiding Principle 5 Air Quality supports air that is healthy and clean. This proposal does a number of things that may help address air quality issues. The first is that it maintains the amount of space dedicated to walking and cycling and does not give more space to the use of the automobile, one of the largest contributors to air pollution. This also is related to another air quality initiative that states “minimize the impact of car emissions”. Second, it maintains the park strips in the city. Park strips provide space for vegetation, mainly street trees, which can be carbon sinks that can help remove some pollutants from the air.

Guiding Principle 8 Beautiful City directs us to help maintain and create “A beautiful city that is people focused.” The associated initiatives include a number of statements about preserving our public spaces. This proposal does that. The related initiatives include:

6. Promote and expand the City’s street lighting program throughout the City.
7. Reinforce and preserve neighborhood and district character and a strong sense of place.
9. Protect, maintain, and expand the City’s urban forest, including the provision of adequate space and infrastructure for street trees to thrive.
12. Reinforce the development of a connected green network of urban open spaces and forest that accommodate active transportation and provide contact with nature.

This proposal does all of these things by preserving the space within the right of way dedicated to things other than vehicles. Guiding Principle 9 Preservation is very similar and contains similar initiatives to those listed above.

Initiative 11 Equity reads: ensure access to all City amenities for all citizens while treating everyone equitably with fairness, justice and respect.” Equity is often a misstated term and has a different meaning than equality. In the context of Plan Salt Lake, equity means that everyone has access to the things that are necessary to live in the City. Housing is a key part of that. Initiative 4 is directly relevant to providing more housing: “support policies that provide housing choices, including affordability, accessibility and aging in place.” Availability of land to build housing on is a major issue in SLC. The current proximity to building requirements are preventing a high number of parcels from having housing built on them. This does not help achieve this guiding principle or this initiative. Making the proposed changes removes a barrier to constructing new housing.

Guiding Principle 13 addresses the behavior of City government and supports “a local government that is collaborative, responsive, and transparent.” The process of identifying barriers to achieving

growth related goals has been identified by the development community, particularly those that are building affordable housing. In recognizing the issue, the City Departments involved in the development process have worked to find solutions to removing this barrier while not reducing the general safety of the public. This proposal helps further the following initiatives:

1. Easy access to complete and understandable information
2. Provide opportunities for public participation, input, and engagement throughout the decision making process.
4. Facilitate open communication and transparency.
5. Maintain and enhance City infrastructure in a way that is equitable and fair.
10. Maintain a safe and healthy natural and human environment.
13. Improve licensing and permitting processes.

ATTACHMENT C: Department Comments

The proposed changes were discussed and debated as a team project from the beginning. The team included representatives from the Fire Department, Building Services, Transportation, Engineering, Planning, the Mayor's Office, and City Attorney's Office. These Departments and Divisions have not provided specific comments in response to the proposed language because they were involved in finding solutions to the issue and participated up through the final draft that is being presented to the Planning Commission. During the process, the team identified the following concerns and issues that have been incorporated into the draft:

- The need to maintain public safety;
- The need to maintain the safety of fire fighters and their ability to respond to structure fires;
- The need to protect the equipment used by the Fire Department in response to structure fires;
- Preventing the effective widening of public streets to comply with proximity to building requirements in the fire code;
- The ability to maintain the function, purpose, and flexibility in use that the park strips provide;
- Reduce the resulting impact to the transit system and bicycle network within the City.
- Reduce the workload on City staff created by the need to seek alternative means and methods for this particular item in the fire code.

The Salt Lake City Fire Department provided the following comment on this proposal:

Throughout the last century firefighting tactics have continued to evolve based on building construction styles, advances in equipment, and better understanding of science of fire behavior. As the construction industry evolves to build taller, stronger, and more energy efficient buildings, the fire service will continue to evolve as well.

The Salt Lake City Fire Department supports the proposed amendment to International Fire Code, Appendix D 105.3, because it improves our ability to protect the lives of the citizens of our city. Appendix D 105.3 is meant to place an aerial ladder truck in the ideal place for rescue from elevated windows. Modern construction uses windows that are meant to be more energy efficient and harder to break. With this in mind, it is more likely that fire crews responding to an emergency would use the building's stair wells and corridors for rescuing people on upper levels.

The amendment to Appendix D 105.3 allows building designers to move the required aerial access road either closer or farther from the building in exchange for improvements to the corridors and stairwells. This will make less of an impact on existing wide park strips and sidewalks while improving the new building's most likely emergency exit paths.

ATTACHMENT D: Public Comment

Public comment was solicited in multiple ways:

- Info and details of the proposal were posted on the City's website;
- Info was sent to all recognized organizations via email and all recognized organizations were given 45 days to provide input.
- Info was presented to the Downtown Alliance Development Committee at a meeting held in September 2019.
- An open house was held on December 12, 2019 at the Salt Lake City Main Library. The open house was advertised to the entire Planning Division list serve, sent to all recognized organizations within the City, posted on the City website, and posted on the State Of Utah public notice website. The open house was also advertised by KUER radio who did a short segment on the proposal and let listeners know the date, time, and location of the open house.

Most of the feedback was provided by the Downtown Alliance Development Committee, who was in support of the proposal. Other feedback was received via email. The email comments are attached. The comments that were received were reviewed by the team working on the proposal in January 2020. A few modifications to the code were made to improve the clarity and address some of the concerns raised. Not all of the comments were addressed because the team felt that the proposed changes were very specific to isolated incidences, were outside the scope of this project, or were things that the Fire Department were not comfortable changing.

From: [Jesse Hulse](#)
To: [Norris, Nick](#)
Subject: (EXTERNAL) Re: Proposed Changes to Aerial Fire Access
Date: Tuesday, December 17, 2019 4:51:22 PM

Nick,

One other potential mitigation option that may help for projects like this - enhanced upper floor egress and rescue, maybe larger operable windows, doors & balconies, etc. I'm sure other people and Fire would have other ideas for these small projects too.

Thanks
J.

On Dec 17, 2019, at 4:45 PM, Jesse Hulse wrote:

Hi Nick,

I'm glad the City is working on changes to the aerial access requirement, as you know we and our clients have been struggling with this issue along with other architects and developers.

I think the list of suggested improvements to mitigate increasing the allowed distance is going to work for a lot of projects, especially high and medium density multi-family buildings, and be a welcome change.

However, there are some project types that I don't think are anticipated in the changes and wouldn't benefit, the two we have had experience with are:

- 3 Story Type V single family, duplex, triplex, or townhomes - 30' to parapet is just not high enough to get typical ceiling heights in 3 stories or a raised front porch on a 3 story home and the proposed mitigations wouldn't be typical, practical or add value for this project type or be unrealistically cost prohibitive.
 - Would it be possible to allow for a few more feet of additional height, or to substitute Type III fire resistant lumber framing to allow for more height and/or the increased distance to access road?
- Tall 2 story Type V commercial - some uses or building forms may need a little more height than 30' but the proposed mitigation strategies wouldn't be practical for this scale and form.
 - would it be possible to allow Type III or Type IV to allow for more height and/or increased distance to access road?

Aside from changing construction type are there any other mitigations that would increase fire safety and be practical for these building types and maybe some others that we haven't thought of?

Thanks again for your work on this.

Jesse J Hulse

Principal, Atlas Architects Inc
Vice Chair, Central 9th Community Council



www.atlasarchitects.com

<Mark for Email.jpg>

From: [Tursic, Emir](#)
To: [Samantha Julian](#)
Cc: [Norris, Nick](#)
Subject: (EXTERNAL) RE: SLC Proposed Changes to Fire Code
Date: Friday, December 13, 2019 11:36:23 AM
Attachments: [image001.png](#)

Samantha, Nick,

We have recently come across this issue on couple of different downtown projects. In addition to the park strips, the trax guides and dedicated bike lanes are making the prescriptive aerial access challenging and in some cases infeasible. From that perspective we support the initiative that will provide more flexibility to meet the code intent.

Thank you.

Emir Tursic, AIA, LEED AP BD+C

Senior Project Architect

Principal



From: Samantha Julian [REDACTED]
Sent: Thursday, December 5, 2019 9:58 AM
Cc: Norris, Nick <Nick.Norris@slcgov.com>; Samantha Julian [REDACTED]
Subject: Fwd: SLC Proposed Changes to Fire Code

Dear DTA Committees,

SLC's Planning Director Nick Norris provided a preview of the upcoming proposed changes to the fire code at our Downtown Transportation Committee meeting in September. The Planning Division is now soliciting comments regarding those proposed changes. Please see the attached information sheet on the proposed changes and details for the December 12 open house.

Thank you.
Samantha

----- Forwarded message -----

From: **Norris, Nick** <Nick.Norris@slcgov.com>
Date: Thu, Nov 21, 2019 at 1:56 PM
Subject: Proposed changes to Fire Code
To: Norris, Nick <Nick.Norris@slcgov.com>

The Salt Lake City Planning Division has been working with the Salt Lake City Fire Department to make changes to a specific section of fire code related to aerial fire access roads and the distance these roads are required to be from buildings that are over thirty feet in height. The proposal would create options for situations where the property is more than thirty feet away from a public street. The option would allow the maximum distance from the street to increase from 30 feet up to 50 feet if enhanced fire protections and fire warning systems are included in the building. Information on the proposal is attached, including the date, time, and location of an open house to discuss the proposal as well as a diagram that visualizes the proposed changes.

After the open house, the Planning Division will meet with the Fire Department to review the comments, concerns, and issues and determine how to address those comments or whether to continue with the proposal. Any comments can be directed to me and I will distribute them to the Fire Department, the Planning Commission, and the City Council as the proposal progresses.

NICK NORRIS
Planning Director

PLANNING DIVISION
COMMUNITY *and* NEIGHBORHOODS
SALT LAKE CITY CORPORATION

TEL 801-535-6173
Email nick.norris@slcgov.com

WWW.SLC.GOV/PLANNING

From: [Doug Thimm](#)
To: [Samantha Julian](#); [Norris, Nick](#)
Subject: (EXTERNAL) Re: SLC Proposed Changes to Fire Code
Date: Friday, December 6, 2019 8:10:19 AM
Attachments: [DougTComments_fire_access_info_sheet\[1\].pdf](#)

Samantha and Nick:

Accompanying are a few comments for your consideration. With the Fire Department's support, I agree that we will have an improved "set of tools" fostering good urban design and promoting healthy communities. With that said, my comments generally are intended to remove ambiguity of definition, along with some suggested fire rating alternatives that are supported by the IBC.

Thanks for reaching out,
Doug Thimm



DOUGLAS A. THIMM

AIA, LEED AP BD+C
PRINCIPAL



[archnexus.com](#)



From: Samantha Julian [REDACTED]
Date: Thursday, December 5, 2019 at 9:59 AM
Cc: "nick.norris@slcgov.com" <Nick.Norris@slcgov.com>, Samantha Julian [REDACTED]
Subject: Fwd: SLC Proposed Changes to Fire Code

Dear DTA Committees,

SLC's Planning Director Nick Norris provided a preview of the upcoming proposed changes to the fire code at our Downtown Transportation Committee meeting in September. The Planning Division is now soliciting comments regarding those proposed changes. Please see the attached information sheet on the proposed changes and details for the December 12 open house.

Thank you.
Samantha

----- Forwarded message -----

From: **Norris, Nick** <Nick.Norris@slcgov.com>

Date: Thu, Nov 21, 2019 at 1:56 PM
Subject: Proposed changes to Fire Code
To: Norris, Nick <Nick.Norris@slcgov.com>

The Salt Lake City Planning Division has been working with the Salt Lake City Fire Department to make changes to a specific section of fire code related to aerial fire access roads and the distance these roads are required to be from buildings that are over thirty feet in height. The proposal would create options for situations where the property is more than thirty feet away from a public street. The option would allow the maximum distance from the street to increase from 30 feet up to 50 feet if enhanced fire protections and fire warning systems are included in the building. Information on the proposal is attached, including the date, time, and location of an open house to discuss the proposal as well as a diagram that visualizes the proposed changes.

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AERIAL FIRE ACCESS

Proximity Requirement

Consider further definition of type of construction, per the IBC. Type I and Type II construction are both noncombustible; however, Type IIB structural frame and structural walls have a zero hour fire rating. I would recommend consideration of Type IA or B and Type IIA.

WHAT IS THE ISSUE?

The International Fire Code includes an aerial access requirement that applies to buildings over thirty feet in height. The aerial access requirement includes a provision titled “proximity to building” that **requires an aerial access road to be located no closer than fifteen feet from a building and no further than thirty feet from a building**. This is typically measured from the curb to the street facing building wall.

The proximity to building requirement conflicts with the wide park strips found throughout the city, particularly in the downtown and east downtown area. **Often, the building is more than 30 feet from the street so the street cannot be used for aerial access, even though it is the typical location for fire response.**

I would suggest that this read that Stairways are enclosed in 2-hour rated enclosures and common corridors serving more than 10 occupants be constructed as 1-hour rated corridors with 45 minute rated doors.

WHAT ARE THE IMPACTS?

In order to use the street for aerial access requirements in the fire code, the following impacts are created:

- * The curb line is relocated so that it is closer to the building, which essentially results in widening the street.
- * On-Street parking is removed to provide space for the fire truck in front of the building.
- * Increases the cost of development. For housing developments, this adds to the cost of each housing unit in a proposed development.
- * The widened street increases the cost to maintain the street because there is more asphalt.
- * Street trees and landscaped areas are reduced to make way for a relocated curb and often times a solid surface for the stabilizing arms of the truck to deploy.

WHAT IS THE PROPOSED SOLUTION?

The proposed solution would **increase the maximum distance that the aerial fire access road can be from the building from thirty feet to fifty feet** if the building contains one of the following improvements intended to help increase fire safety:

1. The structure is a Type I or Type II building type as defined in the International Building Code;
2. Stairwells and common corridors have a 2 hour fire rating;
3. The structure has a compartmentalized design. This includes 2 hour fire walls that extend from the ground to the roof, automatic smoke doors, and areas of safe refuge;
4. The structure provides enhanced smoke detection in addition to fire sprinkler systems. This includes smoke detection systems in all corridors and common spaces that are connected to the fire alarm panel;
5. The aerial fire apparatus road(s) are positioned parallel to one entire long axis side of the building, ~~✗ for buildings up to 124,000 square feet or for buildings over 124,000 square feet have a gross building area of up to 124,000 square feet have aerial access roads positioned parallel to two entire sides of the building.~~

WHAT IS THE FIRE DEPARTMENTS POSITION ON THIS PROPOSAL?

The proposal was written by the Fire Prevention Bureau and was intended to help them make decisions and improve the approval process while not jeopardizing public safety.

QUESTIONS & COMMENTS

For additional information, questions and comments please contact:
Nick Norris // nick.norris@slcgov.com // 801.535.7700

TIMELINE

PUBLIC INPUT

NOV - DEC 2019



PLANNING COMMISSION

JANUARY 2020

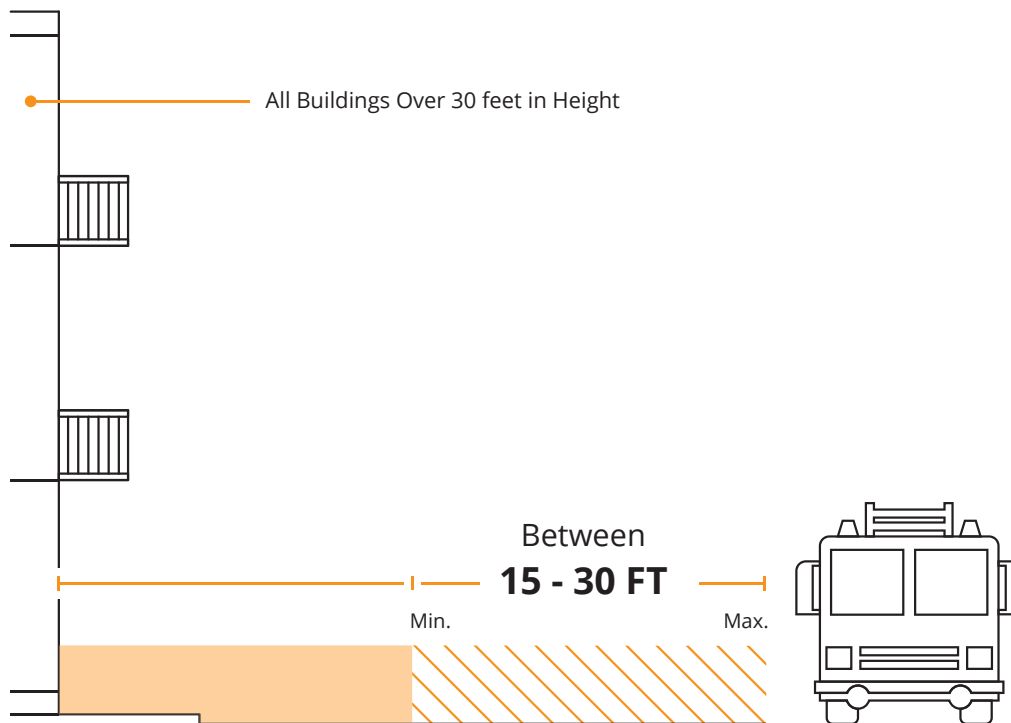


CITY COUNCIL

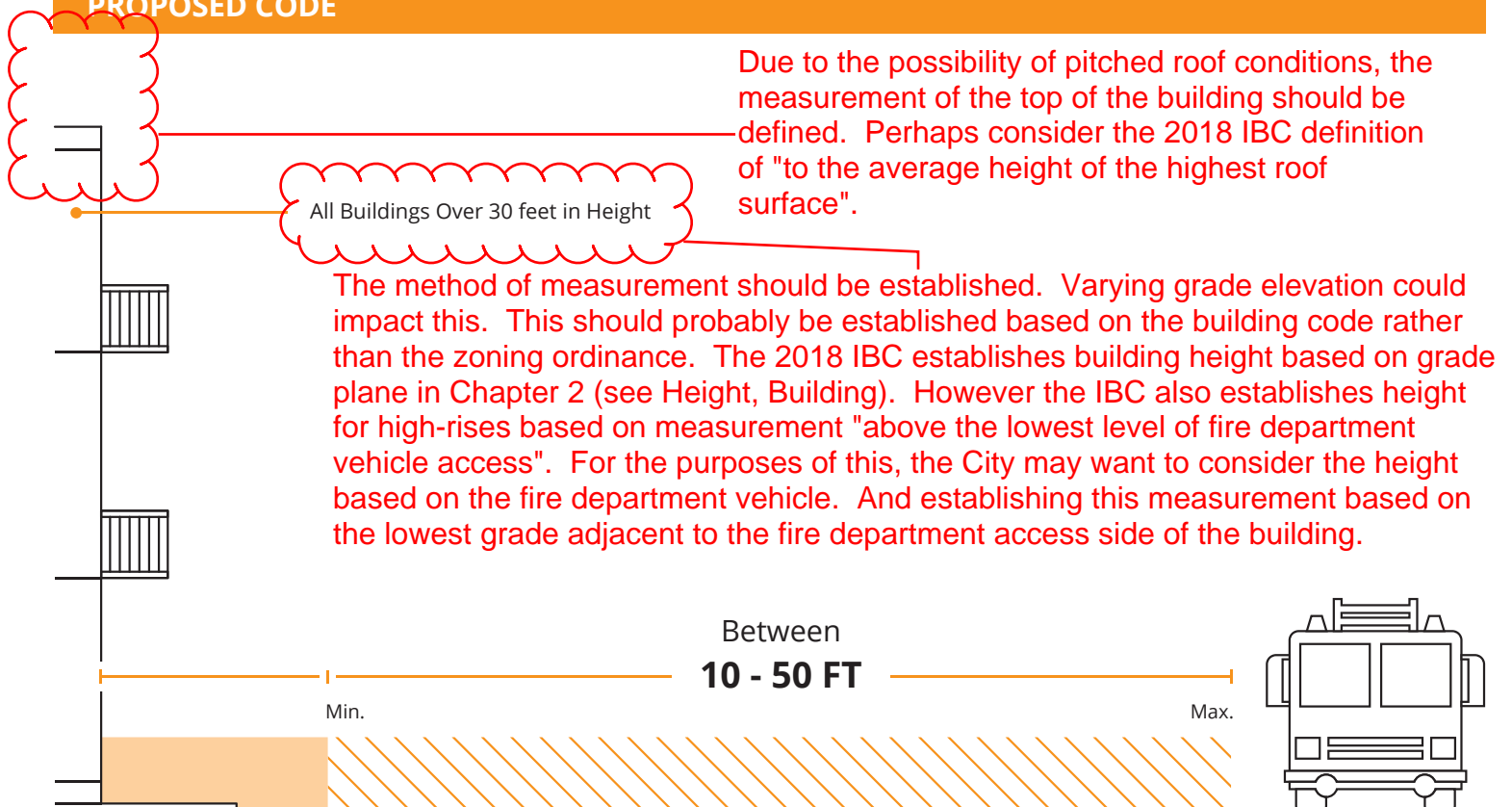
TBD



CURRENT CODE



PROPOSED CODE



From: [Ott, George](#)
To: [Norris, Nick](#); [Goff, Orion](#); [Paulsen, Paul](#)
Cc: [Paterson, Joel](#); [Anderson, Ken](#); [Buhler, Jason](#); [Itchon, Edward](#)
Subject: FW: (EXTERNAL) FW: SLC Proposed Changes to Fire Code
Date: Monday, December 16, 2019 9:59:32 AM
Attachments: [fire_access_info_sheet.pdf](#)
[Proximity requirements recognized organization letter.pdf](#)
[image002.png](#)

For responses to these kinds of questions I would like to know if projects already under review would “qualify” That is assuming they meet one or more of the FD requirements...
As I understand it an alternate means and methods application will be required for this kind of modification to be approved and that suggests any project still in plan review would be eligible.

From: Benjamin Lowe [REDACTED]
Sent: Monday, December 16, 2019 9:43 AM
To: Ott, George <George.Ott@slcgov.com>
Cc: Pieter Berger [REDACTED]; Steven Rosier [REDACTED]
Alex Lowe <[REDACTED]>; Miles Waltman [REDACTED]; Dave Johnson [REDACTED]
Subject: (EXTERNAL) FW: SLC Proposed Changes to Fire Code

George,

We have a number of projects that would be positively affected by this. Assuming that this gets approved on January 22nd, what projects are eligible? We have one project that is already in plan check that would benefit greatly from this (the current plan is to widen a roadway with big cost and aesthetic impact. In addition, we have already submitted Post District for design review, and if adopted this would positively impact a couple of buildings there as well. For projects that have already been submitted for site plan approval and/or plan check, I assume we can modify plans after the approval and submit just the relevant sheets?

Thanks!

Ben

Ben Lowe
Principal

2319 S Foothill Dr Suite 265
Salt Lake City, UT 84109

www.loweprop.com



lowe property group

From: Samantha Julian [REDACTED]
Sent: Thursday, December 5, 2019 9:58 AM
Cc: Norris, Nick <Nick.Norris@slcgov.com>; Samantha Julian [REDACTED]
Subject: Fwd: SLC Proposed Changes to Fire Code

Dear DTA Committees,

SLC's Planning Director Nick Norris provided a preview of the upcoming proposed changes to the fire code at our Downtown Transportation Committee meeting in September. The Planning Division is now soliciting comments regarding those proposed changes. Please see the attached information sheet on the proposed changes and details for the December 12 open house.

Thank you.
Samantha

----- Forwarded message -----

From: Norris, Nick <Nick.Norris@slcgov.com>
Date: Thu, Nov 21, 2019 at 1:56 PM
Subject: Proposed changes to Fire Code
To: Norris, Nick <Nick.Norris@slcgov.com>

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From: [Jarod Hall](#)
To: [Norris, Nick](#)
Subject: Re: (EXTERNAL) PLNPCM2019-00938
Date: Monday, December 2, 2019 12:25:56 PM

Thanks Nick

I do have one question, but it might be better aimed at the fire department. On condition #3 that would allow for the increase has there been a discussion about how many compartments the building would need to be divided into, or is a maximum sqft?

Thanks
Jarod Hall, AIA
Divelept
e: [REDACTED]
c: [REDACTED]
w: www.divelept.com

On Mon, Dec 2, 2019 at 8:46 AM Norris, Nick <Nick.Norris@slcgov.com> wrote:

Jarod,

Attached is the handout that lists the items that would allow the distance requirements to increase. Let me know if you have questions. This will go up on the website today, hopefully.

NICK NORRIS

Planning Director

PLANNING DIVISION

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From: Jarod Hall [mailto:j@divelept.com]
Sent: Monday, November 25, 2019 12:42 PM
To: Norris, Nick <Nick.Norris@slcgov.com>
Subject: (EXTERNAL) PLNPCM2019-00938

Howdy Nick

I saw that you are the contact for the change to the proximity of buildings to the fire lane. Is there text of this amendment somewhere on Accela? I can't seem to find it. I am mostly wondering what construction requirements would be to have the different dimensions.

Thanks

Jarod Hall, AIA

Di'velept

e: [REDACTED]

c: [REDACTED]

[REDACTED][com](mailto:[REDACTED]@divelept.com)