

PLANNING AND COMMUNITY DEVELOPMENT

Date: July 15, 2026

To: Industry Partners and Planning and Community Development Staff (PCD)

From: Meggan Herington, AICP, Executive Director

Re: Development Review of Standards for Fire Protection and Wildfire Mitigation

The purpose of this letter is to provide clarification regarding development application reviews relating to fire protection and wildfire mitigation.

Development Located Within a Fire District

PCD Staff shall send requests to the applicable fire district to review development applications for compliance with their adopted fire code, provide comments on areas of noncompliance, and provide recommendations for achieving compliance. It is recommended that fire districts review and/or provide comments on, at a minimum, the following submittal documents (as applicable):

- Letter of Intent
- Site development plan
- Fire protection report
- Cistern/dry hydrants construction plans
- Final plat
- Preliminary plan

If a fire district has no comments on a project, PCD requests that a statement to that effect be entered into EDARP.

Water Supply: Per Resolution No. 26-139, the requirements for water supply and fire flow shall be consistent with National Fire Protection Association (NFPA) standards and established land use policies and water supply regulations relating to Fire Protection and Wildfire Mitigation as outlined in the Land

Development Code (LDC). Individual fire district development standards for water supply cannot exceed those outlined in the LDC.

Access: The requirements of the adopted fire code for access applies.

Exempt from International Fire Code (IFC) coverage: Per Resolution No. 26-139, the applicability of the IFC applies to commercial development and residential development of five (5) or more single family homes. The following are exempt from IFC coverage:

- Detached one or two family dwellings or townhomes that are constructed on an unplatted parcel (legal lot), on a lot platted as part of a subdivision containing four or fewer such platted lots, or on a lot platted as part of a subdivision recorded before December 10, 2013;
- Factory built units certified by the State of Colorado;
- Those constructed to federal standards; and
- Accessory use structures.

PCD Staff Reviews

PCD Staff shall review all submittal documents for compliance with the LDC and coordinate with the applicable fire district who determines compliance with the fire code and NFPA/LDC for water supply.

For each review cycle and until final review comments are received, if no response is received from the fire district, PCD Staff shall contact the fire district via phone call and email and request comments be submitted. If no response is received after all attempts are made, PCD Staff will move forward with the processing of the application and document in the staff report that the fire district did not provide comments.

PCD Staff shall review applications that are exempt from the IFC for compliance with the LDC. Requests for comments shall continue to be sent to fire districts who may choose to provide comments/recommendations on applications, but the requirements and standards of the LDC govern. Please note the exemptions listed under Resolution No. 26-139 apply only to the IFC and not the LDC.

Per the LDC, proposed subdivisions shall annex into a fire district unless a waiver of this requirement is approved by the Board of County Commissioners. If a waiver of this requirement is approved, PCD Staff shall review applications for compliance with the Fire Protection standards of the LDC.

Wildfire Resiliency Code (WRC)

The codes and standards of the WRC are incorporated into Appendix E Wildfire Resiliency Requirements of the LDC and apply to areas of unincorporated El Paso County that are outside the boundaries of a fire district. PCD is responsible for implementation and enforcement of Appendix E. An affidavit acknowledging the codes and standards of Appendix E is required prior to any permit/application approval. PCD utilizes the State's 2025 Colorado Wildfire Resiliency Code Map to determine fire intensity classifications.

Fire Districts are responsible for implementation and enforcement of the WRC for properties and development located within their districts. How the WRC is enforced is up to each fire district.

Amendments to the LDC

On June 23, 2026, the Board of County Commissioners approved amendments to the LDC relating to fire protection and wildfire mitigation. A brief summary of the amendments is attached. Refer to Edarp Project File No. LDC263 for finalized documents associated with the amendments. Please note that PCD is committed to further engagement with the industry to discuss additional updates to the fire safety and wildfire mitigation standards of the LDC in the future.

Additional Information

This memo replaces the following:

- Fire Letter of Commitment/Fire Protection Report Interpretation of the Land Development Code letter dated September 26, 2023
- Interpretation of the Land Development Code as it relates to Fire Protection and Wildfire Mitigation letter dated June 2, 2025
- Wildfire Mitigation and the Wildfire Resiliency Code (WRC) letter dated October 7, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "Meggan Herington", with a stylized, flowing script.

Meggan Herington, AICP, Executive Director

Project File No. LDC263: Summary of Amendments to the Land Development Code

- Seven new definitions added to Chapter 1 to define the following terms: Alternative Fire Protection Water Supply, Cistern, Dry Hydrant, Emergency Access Lane, Emergency Vehicle Access Road, Fire Protection Report, Minimum Water Supply, and Recognized Water Supply.
- *Applicability* section revised to remove language pertaining to wildland areas, the Vegetation map, and wildland fire risk and hazard mitigation plan. Language added that development located within the boundaries of a Fire District shall be reviewed by the Fire District for compliance with their adopted fire code. Exemptions to the International Fire Code as listed under Resolution No. 26-139 added.
- *Relationship to Other Standards* section removed.
- *Wildfire Hazard Maps/Vegetation Maps* section removed.
- *Combustible Materials for Commercial Use* section relocated from "Construction in Wildland Fire Areas" section to "General" section. Revised to apply only to commercial use.
- *Fire Protection Report* section revised to include information/details added on what information is required on a Fire Protection Report.
- *Fire Protection Commitment* section revised to apply to development located outside the boundaries of a Fire Protection District or otherwise exempt from the adopted fire code.
- *Mitigation Costs included in Construction Financial Assurance* as it relates to financial assurance for wildfire mitigation removed.
- *Plat Notes Required* relocated to new Section 6.3.4 Wildland Urban Interface areas.
- *Automatic Fire Protection* section references NFPA 13, 13R, and 13D and not Pikes Peak Regional Building Code. Language added that the required water supply may be reduced for structures with automatic fire protection.

- *Fire Hydrant Spacing* section modified to remove “nonresidential structures are within 150 ft” and replace with “commercial structures are within 400 ft”. Removed “spacing not to exceed 660 ft. of vehicle travel distance”.
- *Financial Assurance for Water Supply Systems* section modified to remove testing requirement for release of assurance.
- *Fire Cisterns* section modified to add alternative fire protection water supply must comply with NFPA. Language added that all currently recognized water supplies may be considered when determining the need for and the placement of new water storage sites.
- *Maintenance of Dry Hydrants* section removed, and new section added for maintenance of dry hydrants and cisterns. Maintenance plans shall be submitted with the Fire Protection Report.
- *Access to Hydrant* section modified to include common weight of fire apparatuses.
- *Maps and Location/Detail Drawings* section removed.
- New section added for *Alternative Fire Protection Water Supply* to provide alternative options to a cistern or dry hydrant. Alternative water supply must be capable of providing 250 gpm fire flow, and maintain the fire flow, without interruption, for 2 hours. The water supply shall not be more than two (2) miles travel distance from any vehicle entrance to a parcel that is served by the water supply.
- New section added for *Water Use Agreements*. If a private water supply source is to be used, a legal agreement establishing access to and use of the water source is required.
- New section added for *Qualified Professional*. The PCD Director may require any reports, plans, specifications, etc. required for water supply to be completed by a qualified professional.
- New section added for *Plat Notes Required*. Plans for cisterns and dry hydrants shall be identified on the final plat and/or site development plan.
- *Roads Within 150 Feet of Development* section modified to clarify what portion of the structure must be within 150 ft of a road or emergency access lane.
- *Two Access Routes Required* section modified to add distance requirements between two access routes. Matches IFC requirement. A greater distance between two access routes may be required by the ECM.
- *Road Grades in Wildland Fire Areas* section relocated to new *Wildland Urban Interface* section.

- *Emergency Access Lanes Connecting to Roads* section modified to add other alternatives to curb cuts may be acceptable.
- *Load Design* section modified to include the most common weight of fire apparatuses.
- *Bridges and Drainage Crossings* section modified to include most common weight of fire apparatuses.
- *Gate Location and Dimensions* section modified to include clear opening provided through a gate shall be a minimum of 16 ft. in width.
- Section 6.3.4 Forestry removed in its entirety and replaced with new section 6.3.4 Wildland Urban Interface Areas. New section references Appendix E and contains existing language for *Road Grades*, *Access to Structures*, *Access to Structures Not Protected by Automatic Sprinklers*, *Access to Structures Protected by Automatic Sprinklers*, and *Separation Between Structures*, and *Plat Notes Required* under this section. A Wildland Fire and Hazard Mitigation Plan may still be required for commercial development located within a WUI area that is not otherwise subject to the requirements of Appendix E.
- Appendix E- Wildfire Resiliency Code added.