



United States Department of the Interior

NATIONAL PARK SERVICE

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Washington, DC 20240

TECHNICAL BULLETIN

To: Regional Concession Chiefs

From: Chief, Commercial Services Program

Subject: NPS Fire Regulations Transition – Updated October 2024

Purpose

On January 5, 2022, National Park Service (NPS) Director's Order (DO) 58: Structural Fire Management was updated to include the adoption of the International Fire Code (IFC) and the International Wildland-Urban Interface Code (IWUIC), along with referenced codes and standards with exceptions and modifications as outlined in Reference Manual (RM) 58: *Structural Fire Management*. This represents a shift from the use of the National Fire Protection Association (NFPA) as the primary set of codes.

This technical bulletin aims to provide the Commercial Services Program (CSP), specifically park unit Concession Managers and their staff, with background information on the IFC, the regulatory impacts of DO-58, and a brief comparison of applicable NFPA standards to IFC requirements relevant to the CSP and how they apply to the concessioners and leaseholders they oversee.

Background

The concessioner is responsible for fire prevention and protection within their assigned concession facilities. This technical bulletin provides summary information as the IFC standards are complex, and those implementing procedures to address the adoption of these codes should consult with a fire protection professional (i.e., the authority having jurisdiction) to ensure they fully understand these matters. The concessioner will ensure that all concession facilities meet Federal codes and that fire alarm and suppression systems be installed, tested, and maintained by the appropriate certified structural fire professional following applicable codes and standards, NPS policies, and guidelines, including, but not limited to, DO-58. It is the responsibility of the Chief of Commercial Services for each park unit to ensure that the requirements for fire prevention and safety outlined in contracts are adhered to by concessioners. Concession specialists should, however, coordinate with the park or regional structural fire professionals for consultation and advice to address issues, review plans and reports, and otherwise manage structural fire issues.

Summary of CSP Structural Fire Regulatory Requirements

Below is a summary of CSP regulatory requirements pulled from DO-58 and RM-58 to which concessions are to adhere.

1. Commercial Service operations and lessees must comply with the IFC and all other codes, standards, and policies adopted by the Director's Order and [Reference Manual \(RM\)-58](#). The NFPA codes and standards should only be reviewed where referenced by IFC.
2. Concessioners and lessees are responsible for limiting fire hazards by conducting fire and life safety inspections and the inspecting, testing, and monitoring (ITM) of fire protection systems and equipment in the facilities assigned to them by their contract or lease.
3. Each Superintendent will ensure that concession contracts and leases, including their associated exhibits, address the requirements in the Director's Order and RM-58. Through the Annual Overall Rating (AOR),

Superintendents will review and evaluate the concessioner's fire and life safety program, including standard operating procedures (SOPs), ITM records, evacuation documentation, and building inspection records. Program deficiencies identified during this evaluation must be addressed promptly by the concessioner. Fire and life safety program deficiencies and corrective actions will be forwarded to the Regional Structural Fire Marshal (RSFM), the Regional Structural Fire Manager. The role's name has changed to be consistent with the IFC language.

4. The contract template language should be used to develop these contract or lease requirements. Additionally, the NPS Structural Fire team is forming an ITM workgroup, and due to their efforts, requirements may be developed for ITM report management.
5. Each superintendent will ensure concessioners and leaseholders comply with applicable fire and life safety codes and NPS policies during construction and demolition. All plans and documents for new construction or building alterations must be prepared and stamped by state-licensed architects and engineers and reviewed by the designated Fire Code Official (FCO).
6. Concessioner employees engaged in park structural fire suppression programs must meet the training and certification requirements specified in this DO and RM-58.
7. Concessioner structural fire engine companies may operate only when a current, formal, written structural fire aid agreement with the park is in place and the requirement is clearly stated in their contract.

ICC and NFPA: How do they compare?

NPS adopted the IFC as its primary code reference because it regulated the minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire prevention, fire protection, life safety, and the safe storage and use of hazardous materials in new and existing buildings, facilities, and processes. The IFC provides a total approach to controlling hazards in all buildings and sites, regardless of whether the hazard is indoors or outdoors. Where the NFPA is referenced in the IFC, the NPS will still follow these regulations when applicable. These policies supplement NPS Management Policies 2006 by setting forth the operational guidelines necessary to establish and implement structural fire management programs throughout the NPS.

The most widely used nationally recognized model codes in the United States are the [International Code Council \(ICC\)](#) family of codes, which includes but is not limited to the [International Building Code \(IBC\)](#), the [International Existing Building Code \(IEBC\)](#), and the IFC. Both codes reference many other codes and standards, such as the NFPA, that address all areas of design and engineering. These codes are reviewed and updated every three years.

The NFPA 101 Life Safety Code addresses the dangers to life from fire, minimum egress criteria, and operations essential to life safety, including protective features and systems, building service, and maintenance activities. The scope of NFPA 101 does not explicitly include requirements for property protection, although many of the features that provide life safety also inherently provide property protection.

A critical difference between the IBC and NFPA 101 is how they address occupancy classification and handle areas and spaces with high-hazardous materials in significant quantities. The IBC has a separate occupancy classification for areas or spaces that manufacture, process, generate, or store "materials that constitute a physical or health hazard" in amounts more significant than permitted in control areas. The current use of that building determines the term occupancy classification of a building. For example, the most common occupancies concessioners are classified under the IFC as are as follows:

- **Assembly Occupancies:** Buildings used for a gathering of 50 or more persons for deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses. They are characterized by the presence or potential presence of crowds with attendant panic hazards in the case of a fire or other emergency. These buildings are generally open to the public, and the occupants, who are present voluntarily, are not ordinarily subject to discipline or control.
- **Hotels and Dormitories:** A building or group of buildings under the same management that has sleeping accommodations for more than 16 people and is primarily used by transients for lodging with or without meals. These occupancies have a diverse range of fire and life safety issues that must be aware of and addressed.

- **Lodging or Rooming Houses:** Provides sleeping accommodations for 16 or fewer people on a transient or permanent basis. A lodging house may provide meals but should not include separate cooking facilities for individual occupants. Guest houses, bed and breakfasts, small inns, or motels would fall under this category.
- **Mercantile Occupancy:** Any occupancy used for displaying and selling merchandise. This classification includes grocery stores, drug stores, restaurants with fewer than 50 persons, and any occupancy used for displacing and selling merchandise.

The Crosswalk below shows where NFPA requirements are found in the IFC. As noted in the Crosswalk, the IFC (and IBC) reference NFPA codes and standards for many requirements, so the requirements are the same as they have adopted the NFPA reference for that specific topic. For example, the IFC does not have requirements for fire protection system maintenance standards and references the correlating NFPA standard for the type of suppression system.

In contrast, the IBC has the requirements for new construction development, and the IFC has the requirements for existing buildings and operations. Sometimes, the IFC will reference the NFPA where they need their set criteria. For example, the requirements for installing water-based fire suppression systems (NFPA 25) are referenced, which are the following criteria. The Crosswalk below shows where NFPA requirements are found in the IFC. As noted in the Crosswalk, if the IFC (and IBC) references NFPA codes and standards, there is no difference between the two consensus standards.

Effective Dates for New Codes

The ICC has released the 2024 edition of the codes, and the NPS adopted these codes effective January 1, 2024. Adopting the updated codes applies to facility maintenance and construction work funded by all fund sources and projects on NPS property and assets, including work performed by contractors, NPS staff, partners, lessees, and concessioners. For projects currently in progress, the updated codes shall be applied to:

- All Design-Bid-Build projects that have not completed a schematic design before January 1, 2024.
- All Design-Build projects without a Request for Proposals before January 1, 2024.
- All projects that have not received Gate 3: Project Planning & Predesign Completion approval are subject to Regional Investment Review Board review before January 1, 2024.
- All projects that have not received Gate 3: Project Planning & Predesign Completion approval are subject to Bureau Investment Review Board review before January 1, 2024.
- All construction-only projects that do not require design and anticipate contract or task order award after January 1, 2024.
- All construction-based facility work will be conducted by park personnel after January 1, 2024.

Summary of Resources

The following are links to the key policies and codes available for free to all. Note that you will have to make an account for free access to the NFPA Codes.

- [DO-58](#)
- [RM-58](#)
- [ICC Codes](#)
- [IBC Code](#)
- [IEBC Code](#)
- [IFC Code](#)

NFPA-IFC Code Crosswalk

The table below identifies NFPA codes for existing facilities/operations and firefighting. It does not address new construction requirements (which are changing from NFPA 1: Fire Code and NFPA 101 to the International Code Council family of codes, including IBC and the International Mechanical Code). The table identifies which NFPA codes/standards related to facilities/operations and firefighting are transitioned to IFC requirements and which are retained by direct reference in RM-58 or the IFC.

Standards Related to Facilities and Facility Operations

NFPA Code	Scope	IFC Requirements or NFPA Code Reference	Notes
NFPA 1 Fire Code, Chapter 13	Fire Protection Systems (i.e., Fire Alarm and Fire Sprinkler Systems), Fire Protection System Inspection, Testing, and Maintenance Standards	<ul style="list-style-type: none"> • IFC Chapter 9 • IFC Table 901.6.1 • RM-58 • Responsibility RM-58 	<ul style="list-style-type: none"> • IFC Chapter 9 identifies fire protection system installation requirements. • The table references the appropriate NFPA standards for performing ITM on fire protection systems. • RM-58, Section 2.11 • RM-58, Sections 2.2.1.1, 2.2.1.2, 2.2.1.3
NFPA 1 Fire Code, Section 13.6	Selection, installation, and maintenance of portable fire extinguishers	<ul style="list-style-type: none"> • IFC Section 906 • NFPA 10 • RM-58 	<ul style="list-style-type: none"> • IFC Section 906 identifies extinguisher placement requirements but references NFPA 10 for ITM requirements. • RM – 58, Section 2.21
NFPA 1 Fire Code, Chapter 20	Occupancy Fire Safety	None	<ul style="list-style-type: none"> • RM-58 implements DO-58's adoption of the IFC's life safety requirements. The chapters of the Life Safety Code applicable to facility operations are identified below, along with the location of the IFC requirements for each of the NFPA 101 chapters identifying operational requirements.
NFPA 1 Fire Code, Chapter 28	Fire Protection of Marinas, Boatyards, Marine Terminals, Piers, and Wharves	<ul style="list-style-type: none"> • IFC Chapter 36 • NFPA 303 • RM-58 	<ul style="list-style-type: none"> • RM-58, Section 4.6.2.1 references NFPA 303 for fireboat berthing requirements. • RM-58, Section 2.19, Appendix A.3.j indicates NFPA 303 must be followed.
NFPA 1 Fire Code, Chapter 65	Explosives, Fireworks Displays, and Pyrotechnics Before a Proximate Audience	<ul style="list-style-type: none"> • IFC Chapter 56 • RM-58 	<ul style="list-style-type: none"> • RM-58, Sections 2.18.4 and 2.18.5, and IFC Chapter 56 reference NFPA 160, NFPA 1123, NFPA 1124, and NFPA 1126
NFPA 1 Fire Code, Chapter 66	Flammable and Combustible Liquids	<ul style="list-style-type: none"> • IFC Chapter 57 • RM-58 	<ul style="list-style-type: none"> • IFC Chapter 57 identifies use and storage requirements previously governed by NFPA 30 but references NFPA 30 for some construction requirements. • RM-58, Section 2.18.6
NFPA 30	Flammable and Combustible Liquids Code	<ul style="list-style-type: none"> • IFC Chapter 57 • RM-58 	<ul style="list-style-type: none"> • NFPA 30 regulated facility operations concerning using and storing flammable and combustible liquids.
NFPA 101	Life Safety Code	None	<ul style="list-style-type: none"> • RM-58 implements DO-58 adoption of the life safety requirements of the IFC. The chapters of the Life Safety Code applicable to facility operations are identified below, along with the location of the IFC requirements for each of these chapters.
NFPA 101, Chapter 4	General Requirements	IFC Chapter 3	None
NFPA 101, Chapter 6	Classification of Occupancy and Hazard of Contents	IFC Section 203	None
NFPA 101, Chapter 7	Means of Egress	IFC Chapter 10	None
NFPA 101, Chapter 8	Features of Fire Protection	IFC Chapter 7	None

NFPA Code	Scope	IFC Requirements or NFPA Code Reference	Notes
NFPA 101, Chapter 9	Building Service, Fire Protection, and Life Safety Equipment	IFC Chapters 6 and 9	None
NFPA 101, Chapter 10	Interior Finish, Contents, and Furnishings	IFC Chapter 8	None
NFPA 101, Chapter 13	Existing Assembly Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 17	Existing Day-Care Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 24	One- and Two-Family Dwelling Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 26	Lodging or Rooming Houses Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 29	Existing Hotels and Dormitories Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 37	Existing Mercantile Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 39	Existing Business Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 40	Industrial Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 101, Chapter 42	Storage Occupancy Requirements	IFC Sections 1103 and 1104	None
NFPA 110	Emergency and Standby Power Systems	IFC Section 1203	<ul style="list-style-type: none"> Section 1203.4 identifies where emergency power systems are required but references NFPA 110 for ITM requirements.
NFPA 909	Code for the Protection of Cultural Resource Properties – Museums, Libraries, and Places of Worship	Referenced by RM-58	<ul style="list-style-type: none"> RM-58, Section 1.4, 2.1, 2.22.2, Appendix A, Appendix B
NFPA 914	Code for the Protection of Historic Structures	Referenced by RM-58	<ul style="list-style-type: none"> RM-58 Sections 2.1 and 2.22.2 and Appendix A

Standards Related to Firefighting

NFPA Code	Scope	IFC Requirements or NFPA Code Reference	Notes
NFPA 1010	Fire Fighter Qualifications	Referenced by RM-58	RM-58 Sections 4.5.3.3.3, 5.4.1, 5.5.1 and 5.5.2, Chapter 5 – Table 1
NFPA 1010	Fire Apparatus Driver/Operator Qualifications	Referenced by RM-58	RM-58 Sections 4.5.3.3.4 and 5.5.3
NFPA 1010	Marine Fire Fighter Qualifications for Land-Based Firefighters	Referenced by RM-58	RM-58 Section 5.5.8
NFPA 1021	Fire Officer Professional Qualifications	Referenced by RM-58	RM-58 Section 5.5.6, Chapter 5 – Table 1 Note: As part of the consolidation plan, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1020. For further information on this consolidated draft, go to NFPA 1020.
NFPA 1041	Fire and Emergency Services Instructor Qualifications	Referenced by RM-58	RM-58 Sections 5.5.4 and 5.5.5, Chapter 5 – Table 1 Note: As part of the consolidation plan, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1020. For further information on this consolidated draft, go to NFPA 1020.
NFPA 1403	Standard for Live Fire Training Evolutions	Referenced by RM-58	RM-58 Sections 1.9.3.6, 5.5.7 and 5.8.4.4, Chapter 5 – Table 1 Note: As part of the Emergency Response and Responder Safety Document Consolidation Plan (consolidation plan) as approved by the NFPA Standards Council, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1400. For further information on this consolidated draft, go to NFPA 1400.
NFPA 1720	Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Volunteer Fire Departments	Referenced by RM-58	RM-58 Sections 4.4 and 4.5.3.2 Note: As part of the Emergency Response and Responder Safety Document Consolidation Plan (consolidation plan) as approved by the NFPA Standards Council, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1750. For further information on this consolidated draft, go to NFPA 1750.
NFPA 1851	Selection, Care, and Maintenance of Fire Fighter Protective Gear	Referenced by RM-58	RM-58 Section 4.5.7 Note: As part of the consolidation plan, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1850. For further information on this consolidated draft, go to NFPA 1850.
NFPA 1852	Selection, Care, and Maintenance of Fire Fighter Self-Contained Breathing Apparatus (SCBA)	Referenced by RM-58	RM-58 Section 4.5.7.4 Note: As part of the consolidation plan, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1850. For further information on this consolidated draft, go to NFPA 1850.

NFPA 1900	Standard for Automotive Fire Apparatus	Referenced by RM-58	RM-58 Section 4.6.1
NFPA 1910	Standard for the Inspection, Maintenance, Refurbishment, Testing, and Retirement of In-Service Emergency Vehicles and Marine Firefighting Vessels	Referenced by RM-58	RM-58 Section 4.6.1 Note: NFPA 1910 is a combination of Standards NFPA 1911, NFPA 1912, NFPA 1925, and NFPA 1071.
NFPA 1932	Standard on Use, Maintenance, and Service Testing of Fire Department Ground Ladders	Referenced by RM-58	RM-58 Section 4.6.5 Note: As part of the Emergency Response and Responder Safety Document Consolidation Plan (consolidation plan) as approved by the NFPA Standards Council, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1930. For further information on this consolidated draft, go to NFPA 1930.
NFPA 1960	Standard for Fire Hose Connections, Spray Nozzles, Manufacturer's Design of Fire Department Ground Ladders, Fire Hose, and Powered Rescue Tools	Referenced by RM-58	RM-58 Section 4.6.4 Note: NFPA 1960 is a combination of Standards NFPA 1931, NFPA 1936, NFPA 1961, NFPA 1963, and NFPA 1964.
NFPA 1962	Standard for Care, Use, and Service Testing of Fire Hose, including Couplings, Nozzles, and Fire Hose Appliances	Referenced by RM-58	RM-58 Section 4.6.4 Note: As part of the Emergency Response and Responder Safety Document Consolidation Plan (consolidation plan) as approved by the NFPA Standards Council, this Standard is slipping cycle and being combined into a new consolidated draft, NFPA 1930. For further information on this consolidated draft, go to NFPA 1930.
NFPA 1970	Standard on Protective Ensembles for Structural and Proximity Firefighting, Work Apparel, Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services, and Personal Alert Safety Systems (PASS)	Referenced by RM-58	RM-58 Section 4.5.7 Note: NFPA 1970 is a combination of Standards NFPA 1971, NFPA 1975, NFPA 1981, and NFPA 1982.

Distribution and Further Information

Please distribute this technical bulletin to concession specialists and other appropriate personnel within your region. If you have any additional questions, please email CS_CM_helpdesk@nps.gov.