



# HOWARD COUNTY DEPARTMENT OF FIRE AND RESCUE SERVICES

2201 Warwick Way, Marriottsville, MD 21104  
410-313-6000

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**CHRISTINE M. UHLHORN, FIRE CHIEF** • **CALVIN BALL, COUNTY EXECUTIVE**

To: Lonnie R. Robbins, Chief Administrative Officer

From: Christine M. Uhlhorn, Fire Chief

Subject: Testimony on Council Bill No. 35-2019

Date: June 20, 2019

Every three years, the National Fire Protection Association (NFPA) updates their standards which are comprehensive regulatory guidelines developed through industry research and consensus. These standards span a wide range of areas to include building construction, safety features, inspection, maintenance, hazardous materials and fire department access to name a few. The overarching aim of the guidelines is to achieve fire and life safety protection for the public, property, and first responders.

Maryland is among many states that adopt NFPA 1 as the fire code, which is then locally amended in most jurisdictions for based on local nuance. In Howard County, local amendments are outlined in Title 17, Section 104 which serves as the 'Howard County Fire Prevention Code'. This critical legislation is the basis for numerous initiatives managed by the Office of the Fire Marshal [OFM] that help make this community a safer place to live, work, and visit.

The Department of Fire and Rescue Services (DFRS) currently enforces the NFPA 1, 2015 amended edition. Adopting this edition was a significant step for our County due to the nine year gap between this and the edition in use at the time (NFPA 1, 2006 edition). As can be expected, the myriad of regulatory changes that occurred over those nine years created substantial revisions to our code language.

Beginning in early 2018, members from the Office of the Fire Marshal attended every meeting throughout the state to participate in the process for the 2018 code amendment cycle. By providing our input, consensus was reached and the Maryland State Fire Commission is in the process of adopting the new state Fire Code now. Also participating in this process, it is our understanding that the Department of Inspections, Licenses and Permits (DILP) has filed for their adoption of this code and this goes into effect in July of this year.

After participating in this consensus process, DFRS spent countless hours examining every line of the fire code to ensure it was at its highest standard. While there were some new issues in the latest edition of NFPA 1 requiring our attention, there were much fewer than what was addressed in 2015 due to the fact that we have not skipped a cycle. This afforded DFRS the ability to ensure that every section meets the spirit and intent of our overarching goal of public safety. Thus, while over two hundred lines of locally amended code were revised, the overwhelming vast majority of these revisions were for enhanced clarity alone.



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With that said, there are several local amendments proposed by DFRS aimed to further support the mission of protecting life and property here in Howard County. These amendments include:

- Language was added to the existing provision requiring fire alarm and fire suppression system companies reporting inspections through our Contractor Portal to submit these crucial, oftentimes critical, reports within a defined timeline. Failure to report systems not functioning properly within these defined timelines now carry a penalty, aimed at encouraging compliance and maintaining the efficacy of these systems (pg. 30, Section 13.1.6.1).
- The provision that existed allowing a twelve year grace period for high-rise buildings to install automatic sprinkler systems has now been removed due to the successful installation of these systems in all such buildings within the county, thus rendering this section unnecessary (old Section 13.3.2.26.2.3).
- With the increase of unique structures where large residential occupancies are built over commercial constructing, sometimes referred to as “donut buildings”, we have changed the language to the access box section. This change further clarifies that in unique circumstances, more than one fire department access box may be required due to the increasing number of access points on such structures (pg. 43, Section 18.2.2.1).
- A new section was added prohibiting the arbitrary painting of curbs red by organizations, homeowners associations, or the general public. This language states that only the fire department can identify a curb as a fire lane (pg. 44, Section 18.2.3.6.5).
- To maintain the department’s ability to provide equal and ubiquitous service throughout our varied landscape, a new provision is included that secures a small piece of land (50 feet by 100 feet) in new neighborhoods that are outside of the Public Service Area (PSA) which propose ten or more homes. This allows the department the ability to install a cistern (water source), at our cost, only if there is no other adequate water source nearby, for the protection of the proposed homes (pg. 47, Section 18.3.1.2).
- New language allows DFRS to require additional fire drills above and beyond the required six fire drills annually in the event we feel a particular school will benefit from them (pg. 52, Section 20.2.4.2.3.1).
- The 2018 edition of NFPA 1 added an entire chapter directed toward food truck regulations. Howard County was forward thinking during the last code cycle and adopted our language then. We propose no changes to our permitting provisions. However, since the state did not strike this chapter and we cannot be more lenient than COMAR, we amended the sections to match the state and work our current permit language into the chapter (pg. 61, beginning in Section 50.7.1.2).

DFRS has worked closely with the Office of Law, the Legislative Analyst, and relevant partner agencies to complete the Fire Code for adoption. Your support of this important legislative initiative is sincerely appreciated.