



United States Department of the Interior

NATIONAL PARK SERVICE
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TECHNICAL BULLETIN

To: Regional Concession Chiefs

From: Chief, Commercial Services Program

Subject: National Park Service Adoption of International Fire Code over the former adherence to National Fire Protection Association Codes

The National Park Service (NPS) has adopted the International Fire Code (IFC), the International Wildlife Interface Code (IWUIC), the complete International Code Council (ICC) family of codes (I-Codes) and the National Electrical Code (NEC, NFPA 70, published by the National Fire Protection Association (NFPA).

These codes largely replace the NFPA Code as “applicable law” in concession contracts, leases and commercial use authorizations. They also replace the NFPA as referenced in Section 6.10.2, Concessioner Risk Management of the [NPS Commercial Services Guide](#). These codes are also being incorporated into updates to applicable [Directors Order’s and Reference Manuals](#) (e.g., Directors Order (DO) 50, Risk Management Program and DO 58, Structural Fire Management). Concessioners must adopt these codes in their risk management program (RMP), implement and comply with these codes.

Distribution

Please distribute this memorandum to all parks with concession contracts, leases, or commercial use authorizations. Parks are further asked to distribute the memorandum to all their commercial service operators.

For Further Information

For additional information please see the publicly-available [Concessioner Tools Risk Management](#) website and the [Contract Management/Risk Management](#) section of the internal Concession Specialist Toolbox. You may also contact Roberta Gorman, the Structural Fire Prevention Program Manager/Prevention Chief NPS Structural Fire Program, at nps_nifc_structure_fire@nps.gov for additional questions related to the fire code adoption.

Background

In 2016, a task group was put together to determine if the NPS would obtain the same type of regulatory coverage if I-codes were to be adopted over the NFPA codes. A third party was consulted to develop a report titled *National Park Service Code Comparison International*

Building Code vs. NFPA 101, dated June 20, 2016, to provide the insight on the value of adopting the IFC service wide. The report aided in the decision to officially adopt the IFC in 2022 as the primary fire and life safety code (LSC) for the bureau and re-confirmed the adoption of the IWUIC previously adopted in 2019. IFC along with the IWUIC is now supported by the 2023 NPS adoption of the complete ICC family of codes (I-Codes). Additionally, the NEC, NFPA 70, published by the National Fire Protection Association is adopted as the nationally recognized code for electrical work. This provides standardization of code implementation and compliance as it relates to facility construction, design, and maintenance, as well as fire and life safety.

The NPS will automatically adopt new editions of the ICC family of codes and the NEC, NFPA 70, published by the NFPA on the dates they become available. The most current version of the code will be applied to a project when the project is initiated. NFPA standards may apply to fire and life safety issues where referenced and/or applicable in the I-Codes. These codes are applicable to all entities that occupy and execute any type of construction on NPS lands and work done on any NPS owned property.

Concessioner Responsibilities

It is the sole responsibility of the concessioner to adhere to and comply with all applicable regulations and codes. The requirements contained in these codes can be complex and concessioners must consult all applicable Federal, State, county, local, and any other authority having jurisdiction to determine which laws, regulations, codes, or standards apply to through the entire scope of their activities from facility construction and maintenance to operations. Operators must provide personnel with the appropriate knowledge, skills, and abilities to comply and must ensure personnel are provided the proper training to understand and meet their requirements. This may include specialized training to understand the NPS code changes. It is noted that it is critical to engage early with NPS Fire Code Officials (FCOs) and Building Code Officials (BCOs) to ensure appropriate reviews and approval have been given for all concessioner construction projects. Concessioners must consult with their park commercial services points of contact to make sure these engagements occur.