July 24, 2026
Development Business and Building Services
City of Calgary
800 Macleod Trail SE
Calgary, Alberta, T2P 2M5

Attention: Iain Macphie, Senior Safety Codes Officer

Dear Iain,

RE: B23-### - Fire Department Access to Part 9 Buildings Advisory - Draft

Thank you for the opportunity to review the draft **Fire Department Access to Part 9 Buildings Advisory**.

BILD appreciates the objective of improving firefighter access as Calgary continues to see more rear-lot, infill, and higher-density Part 9 housing forms. We recognize the importance of ensuring emergency responders can safely and effectively access buildings while supporting occupant safety. BILD supports a risk-based approach that achieves the desired fire safety outcomes while allowing flexibility in how those outcomes are achieved. BILD also recognizes the importance of aligning new requirements with broader objectives related to housing supply, affordability, and predictable development processes.

Following consultation with our members, several technical and implementation questions were identified. Many relate not to the overall intent of the advisory, but to understanding the technical basis for the proposed requirements, how they will be applied in practice, and how they align with existing City standards – guidelines, Fire Department Access Standards, and the National Building Code – Alberta Edition (NBC(AE)). Members also emphasized the importance of ensuring any new requirements are practical to implement, proportionate to the identified risk, and do not create unintended impacts on housing affordability, project feasibility or permit timelines.

Our comments are summarized below.

1. **Requests for Clarification and Technical Guidance**

   Members identified several areas where additional clarification or supporting information would assist applicants in understanding how the advisory is intended to apply.

   Technical Basis and Application

   - The advisory limits certain provisions to buildings no more than two storeys in height, whereas Part 9 of the NBC(AE) permits compliant buildings up to three storeys. Could Administration explain the rationale for limiting these provisions to two-storey buildings?

- The proposed 45 m firefighter travel distance appears to be a new design criterion for Part 9 buildings. We would appreciate information on the technical or operational basis for this distance, including any regulations, supporting studies, incident data, or analysis that informed its development.
- The advisory requires an Alternative Solution prepared by a registered professional engineer in certain circumstances. As Alternative Solutions are accepted under the NBC(AE) in a variety of forms depending on the nature of the proposal, could Administration explain why a professional engineer is specifically required in this instance?

  Members are also concerned that requiring a professional engineer may significantly increase the complexity and cost of this pathway for many Part 9 projects due to additional consultant costs, review time, and approval complexity. As a result, applicants may be effectively discouraged from pursuing Alternative Solutions, even where an equivalent level of safety can be demonstrated and may instead be required to pursue more costly prescriptive solutions such as sprinkler installation.

Technical Clarifications

We recommend providing additional clarification on several items, including:

- Whether gates are permitted within the firefighter access path, including locked or self-latching gates and any minimum opening requirements.
- How a compliant gate could realistically be accommodated within a typical 1.2 m (4 ft) side yard while maintaining the required 1 m unobstructed path of travel.
- Whether covered window wells may project into the access path.
- Additional examples illustrating when NFPA 13D, NFPA 13R and NFPA 13 apply (for example, dwelling units located above detached garages).
- Consistent references throughout the advisory identifying the applicable document (e.g., "Article 3.2.5.6 of the NBC(AE)") wherever Code provisions are referenced.
- Whether existing City-owned lanes constructed to municipal engineering standards are intended to satisfy the structural loading requirements, as the requirement that access routes "must be paved" may be difficult to apply where existing public lanes are unpaved. Clarification is requested on whether an individual development would be expected to upgrade or pave an existing public lane.
- Whether the advisory should address the protection of firefighter paths of travel where access routes pass adjacent to other buildings. Members noted that while the advisory addresses the provision of access, it does not appear to address potential exposure risks along that access route. Part 3 of the NBC (AE) provisions recognize the importance of protecting exit pathways from exposure to unprotected openings, and similar safety

principles may be relevant where firefighter access routes pass alongside existing buildings.

2. **Technical Alignment with Existing Standards**

Members noted several areas where the advisory appears to differ from existing City guidance and would benefit from clarification regarding how requirements are intended to work together.

- Figure 2 references only a "street" despite the advisory recognizing that acceptable fire department vehicle access may also be provided from a lane, private roadway, or other approved access route. Updating the figure or adding a note would improve consistency.
- The proposed hydrant and vehicle travel distances appear difficult to reconcile with the Calgary Fire Department Access Design Standards, including the maximum distances illustrated in Figures 2 and 3 (page 8) of those standards. Members also noted a potential alignment issue between the proposed maximum hydrant-to-firefighting vehicle distance of 45 m (or 75 m where supported through an Alternative Solution) and the hydrant coverage requirements contained in the City's Design Guidelines for Subdivision Servicing (DGSS). The DGSS establishes maximum hydrant spacing and coverage distances based on development type, including maximum 300 m spacing between hydrants for low-density residential development and maximum 300 m distances from the backup hydrant to property lines. Additional explanation regarding how these requirements are intended to operate together would provide greater certainty regarding how compliance is expected to be demonstrated.
- The advisory also appears to differ from the City's Design Guidelines for Subdivision Servicing (DGSS), which state that fire department vehicles shall have direct access to at least one face of every building by means of an access route, street, or yard. It would be helpful for Administration to explain how this requirement is intended to apply alongside the proposed advisory, particularly where existing subdivision designs have already been approved and designed in accordance with the DGSS.
- Where multiple City standards or guidance documents apply, applicants would benefit from a clear hierarchy identifying which requirements govern where differences exist.

3. **Implementation and Policy Considerations**

Members also raised several questions regarding implementation, consistency, and the broader impacts of the advisory:

- Who will determine whether engineering requirements such as hydrant flow calculations, firefighter travel distances and Alternative Solutions have been satisfactorily addressed?
- What engineering discipline or qualifications are expected for these submissions?

- To what extent will applicants be able to demonstrate an equivalent level of firefighter access or fire protection through alternative design approaches where the intent of the advisory can be achieved?
- Will published guidance or acceptance criteria be available to applicants before submission?
- Will there be opportunities for early discussions with City staff on more complex projects to reduce redesign and review cycles?
- Where there is a difference of technical opinion, will there be a collaborative resolution process beyond written plan review comments?
- Has Administration considered the differing impacts these requirements may have on new greenfield developments, where access can often be incorporated during community design, versus redevelopment and infill projects where lot configurations, hydrant locations, and surrounding site conditions are already established? Understanding these differences will be important to ensure the advisory supports, rather than unintentionally limits, Council's objectives related to housing choice, intensification, and increased housing supply.

Providing greater certainty on these matters would improve consistency and help reduce unnecessary permit delays.

Timing Within the Development Approval Process

Many of the proposed requirements have the potential to influence building location, site layout, grading, servicing, fencing, and hydrant access. By the time an application reaches the Building Permit stage, these elements may already have been established through the Development Permit and engineering approval processes.

BILD encourages requirements that could materially affect development design or feasibility to be identified as early as possible, preferably during the Development Permit stage, to avoid unnecessary redesign, additional costs, additional review cycles, permit delays, and uncertainty for applicants.

Broader Considerations

Finally, we encourage Administration to provide additional information regarding the anticipated impacts of the advisory. The National Code development process typically includes not only a problem statement but also supporting analysis regarding the technical justification, implementation considerations, and potential impacts of proposed changes. Similar information would assist industry in understanding the basis for the proposed requirements and evaluating their potential impacts on housing design, affordability, permit timelines, development feasibility, and the ability to deliver individual projects.

We also encourage Administration to share any supporting evidence, operational experience or risk analysis that informed the proposed requirements, including any identified gaps with the current NBC(AE) provisions and how the proposed advisory is intended to address those gaps. Providing this context would help industry better understand how the advisory responds to identified fire service challenges and how the proposed measures are expected to improve firefighter access and public safety.

BILD recognizes the importance of providing clear and consistent guidance for firefighter access requirements. If the intent is for these provisions to become an established standard practice, a consolidated, referenced, and illustrated approach would provide greater certainty for applicants and support consistent application across different building types and development scenarios.

If the intent is to establish additional guidance for Part 9 building access requirements, BILD suggests that Administration consider whether incorporating the advisory requirement into the existing Fire Department Access Standard document would provide greater clarity and consistency for applicants. A consolidated standard, supported by clear figures identifying which requirements apply to specific building types and scenarios, along with references to the applicable code provisions, would help reduce interpretation differences and provide greater certainty during the design and approval process.

BILD also encourages Administration to identify any proposed transition provisions, including how the advisory will apply to active applications, approved Development Permits, and projects already in the design process to provide certainty for applicants and avoid unintended redesign or delays.

Given Calgary's continued focus on increasing housing supply, enabling housing choice and supporting more efficient forms of residential development, BILD encourages Administration to consider how the advisory aligns with broader Council-approved housing objectives, including the need to support predictable pathways for infill and higher-density housing forms.

We appreciate the opportunity to provide these comments and would welcome continued discussion as the advisory is refined. We believe additional technical guidance, supporting rationale and implementation clarity will help achieve the shared objective of improving firefighter access while maintaining a predictable and efficient approval process.

Sincerely,

Amie Blanchette
Chief Executive Officer
BILD Calgary Region