



National Headquarters:
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October 14, 2025

Dear Members of the Commerce City Council,

On behalf of the National Fire Sprinkler Association (NFSA), thank you for your continued dedication to fire and life safety and for engaging in meaningful dialogue about residential fire sprinklers. NFSA's mission is to save lives and protect property by promoting the widespread acceptance of the fire sprinkler concept. With over 120 years of history, we understand the urgent need for affordable housing—both nationally and within Commerce City, but, we know from local, state, and national statistics, that affordable housing must be safe housing, which includes early warning, early suppression, and emergency response.

As you consider potential changes to the current ordinance, I respectfully offer the following perspective:

- Commerce City is a leader in Colorado and in most states outside of California and Maryland (all new residential occupancies require fire sprinklers), because you have adopted the minimum codes and standards.
- Our most vulnerable populations to fire are those under 14 (they can't hear a smoke alarm) and those over 55 (hearing, mobility, habits, etc.) Fire has been and always will be a socioeconomic problem impacting all of us less fortunate than others at various rates.
- The homebuyer of spec homes doesn't get to pick any of the other minimum health and safety features that are included in the minimum building codes, such as tempered glass, stair height and rails, electrical circuits, water or sewer lines, smoke alarms, carbon monoxide alarms, etc.
- Keeping the requirements you currently have will save the lives of citizens and firefighters beyond your terms of office. The Public Policy decisions you have already made are saving lives and property and will for the next 50+ years. The Thirteen Fire in Moffat County in August 2025 started inside a house, burned 4 other buildings, evacuated 55 other houses, and injured 2 firefighters. Yes, this could have been another Marshall Fire, but it could have been prevented if the house the fire started in would have automatic fire sprinklers. There was recently a fire in California that started inside a house, controlled by fire sprinklers that given the conditions that day, without fire sprinklers, would have been another catastrophic fire. Correct, you didn't hear about it or read about it because a single fire sprinkler controlled it until the fire department arrived and extinguished it.

We commend your commitment to safety, especially in the wake of the tragic Marshall Fires. As Commerce City continues to modernize its infrastructure and expand housing options, it is vital that fire and life safety remain a top priority. While fire-resistant materials play an important role, they cannot replace the effectiveness of automatic fire sprinklers. Fire sprinklers are the only active fire protection in a home to control a fire inside homes before firefighters arrive.

Buildings equipped with automatic fire sprinkler systems have consistently shown reduced death rates and property damage. The fire loss to the building and contents in fire sprinkler-controlled incidents is only 1.2 percent. Looking at this another way, 98.8 percent of the value of the building and contents remained after the fire. Over the past 40 years, the widespread adoption of fire sprinklers has contributed to a significant decline in fire-related fatalities across the United States. From 1980 to 2023 there has been a 44 percent reduction in the number of fire deaths annually. In fully sprinklered structures, the risk of firefighter death is nearly eliminated, and injury rates are substantially lower. The fire death rate (fire deaths per million population) is even more dramatic. In that time, there has been about a 51 percent growth in population, while we have seen a 63 percent reduction in the fire death rate nationally (fire deaths per million population went from 28.71 to 10.75).

Where fire sprinklers are present, there is an 88 percent reduction in fire deaths in homes. With fire sprinklers = 1 death per 1,036 fires. Without fire sprinklers = 1 death per 120 fires. Don't let anyone fool you with new houses are safer than old houses, they are not, they are more deadly and destructive. Fire is 6 times faster today than 30 years ago because of new homes (the size they are, how they are built, the materials they are built out of, and the energy code that makes them tighter on the outside and more open on the inside), the volume of content in the home, and the synthetic material that the home and all its contents are made out of.

If you don't do anything else, we urge you to maintain the current sprinkler requirements. Your leadership in prioritizing both affordability and safety is commendable.

Thank you again for your leadership and for prioritizing the safety of Commerce City residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Shane Ray". The signature is fluid and cursive, with the first name "Shane" and last name "Ray" clearly distinguishable.

Shane Ray
President