



DEPARTMENT OF FORESTRY AND FIRE PROTECTION
OFFICE OF THE STATE FIRE MARSHAL

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I-3 OCCUPANCY CODES WORKING GROUP MEETING NOTES - MARCH 01, 2016

Attendees:

Bill Robertson
Greg Andersen
Andrew Henning
Ernie Paez
Steve Guarino
Josh Gibson
Michael Vierra
Gary Dunger
Rick Cortina
Jeff Maddox
Maynard Feist
Lorenzo Lopez
Paul Menard
Michael Scott
Bob Hoskins
Aaron Greer

William Novoa
Robert Oates
Spencer Meyer
Lorenzo Martin Lopez
Carmelito Cataylo
Sanjay Aggarwal
Aman Shah
Shawn Sen
Michael Stewart
Andrew Thul
Michael C. Vieira

Via Phone:

Edward Ellestad
Jon Marhoefer
Susie Adamian

AGENDA TOPICS

1. Welcome and Working Group Purpose

Andrew Henning and Greg Andersen welcomed everyone to the meeting of the I-3 Occupancy Codes working Group. Each person here brings a wealth of knowledge and experience and various backgrounds to this group. The purpose of this task group is to review building and fire codes effecting correctional facilities throughout the state, and to develop and provide recommendations to the State Fire Marshal for consideration and/or implementation. We need to get the codes to catch up to where the current designs are. We will establish a Finalized Working Group Report. These efforts will be on-going, and we will need to re-convene at a minimum of every 18 months to address further issues.

Chief Paez addressed the group. Chief Paez indicated that the last I-3 meeting was in 2011. He advised that there is a lot of interest in code and with this working group. He expressed his appreciation to all who are in attendance today.

Chief Steve Guarino addressed the meeting. Chief Guarino stated that in 2011 substantial changes were made. Code language changed. However not all issues were addressed at that time. We still need to deal with I-3 settings and small holding cells in courtrooms. The International Building Code changed. We need to fix codes that are broken, the first time around. Chief Guarino advised that he has hopes for a clean cut guidance to move forward. Greg Andersen stated that Code Development is running 6 groups for

occupancy. He stated that we need to prioritize and corroborate our efforts to move forward.

Andrew Henning addressed the group and advised that on the first task force there were rules of conduct set up to follow. After a brief discussion it was determined that future meetings would be conducted through the GoToMeeting process and conference calls. A. Henning advised for everyone calling in to please keep their phones on mute during the meeting. He advised everyone that there will be meeting minutes posted on the website for any interested stakeholders who wish to review this information. Please add your name to the distribution list if anyone is interested.

2. Overview and Background

A brief discussion took place outlining the accomplishments of the previous working group. Andrew Henning stated that the last working group used a matrix. A discussion took place, where it was determined that a brainstorming session would take place first, then a matrix would be created that would document sections for listed issues, codes, solutions and which sub-committee would address the different concerns going forward.

The Office of the State Fire Marshal (OSFM) has completed the 2015 Triennial code Adoption Cycle. On or before July 2016 codes will be published and available for purchase with an effective date of January 1, 2017. This working group will not impact current working codes.

- The new codes are based on the 2015 International Building Code (IBC) and International Fire Code (IFC).

The next code cycle is the 2016 Intervening Code Cycle

- The rule making cycle requires OSFM to submit its rulemaking package to the Building Standards Commission in December 2016.
- This Working Group must submit submitted all proposed code changes to the State Fire Marshal by September 1, 2016.
- Proposals will be heard by the CBSC, Building Fire and Other advisory committees around March 2017.
- There will be a 45 day comment period, with potential for additional comment periods to be added.
- Final CBSC action to take place on or before July 2017.
- The changes will go into effect on July 1, 2018.
- The next code cycle would be the 2018 Triennial Code Adoption Cycle

3. Establish Goals and Objectives

The group discussed and approved the purpose and scope as outlined. One of the goals of the last committee was to make this working group process cost effective. An internal discussion took place and the following goals were created and approved.

Committee Goal

1. Provide clarity to all stakeholders.
2. Keep the working group and reconvene every 18 months to determine if additional changes are needed to the California Building Code (CBC) due to changes in construction methods, technology and operational impact and program needs.
3. Better communication between stakeholders regarding new code and interpretations.
4. Better balance between Fire and Life Safety and security, and ensure National Standards are met.

5. Provide Unified Consensus for Regulations and Standards.
6. Look at all regulations and codes for accuracy, ambiguity and consistency as they relate to areas where persons are restrained.
7. Review and make recommendations for proposed code changes to the State Fire Marshal in accordance with health and safety code section 18930.
8. Evaluate California Building Standards to determine the threshold of restraint when occupancy becomes an I-3.
 - a. Research needs to be conducted to look at statute to determine if any sections specifically address restraint.
 - b. The conflicts between I-2 and I-3 needs to be addressed.
 - c. Is the definition of an I-3 in the CBS appropriate? Can additional clarity be provided?

PURPOSE

The purpose of this committee will be to advise the State Fire Marshal on all matters relating to fire and panic safety regulations and building standards relating to facilities where persons are restrained. This process shall strive to provide a safe, code compliant environment that meets the needs of the owner/facility operations, including security, cost effectiveness constructability and sustainability. To identify facilities or portions thereof, where persons are restrained that would be classified by the California Building Code as group I-3 occupancies.

SCOPE

The scope of the project is to review and evaluate the current California Code of Regulations, Title 24 – California Building Code, Group I-3 provisions and other facilities or occupancies where persons can be restrained to determine if revisions (amendments) are needed for the next California Code cycle. The task group will develop and provide recommendations to the State Fire Marshal for consideration and/or implementation.

4. Proposed Changes and Report

A general discussion took place regarding OSFM Code Interpretation 16-001 - *I-3 Occupancies General Questions* that was published February 9, 2016.

http://osfm.fire.ca.gov/codeinterpretation/pdf/2016/16-001_I-3_Occupancies_General_Questions.pdf

This was used to start the discussion of code issues that may need to be changed or clarified.

- Question #1: Do all required exits from jail recreation yards need to exit directly to the exterior?

A discussion took place in which this question was interpreted as, once you are outside you cannot come back into the building. Balconies are excluded from exit. A discussion took place regarding whether this area would be acting like a room or a corridor. If not used as a corridor, it can be used as a room, wherein you could return into the building and no additional requirements are needed. Further discussion led to whether there would be a requirement for a stairwell which would add another penetration in security. Initial determination was that this was not looking at high rises. It was determined that the working group needs to further evaluate and make recommendations on whether this is a Jail or High Rise Jail situation. Questions were asked regarding the use of the recreation area that serves open and enclosed areas, as problems occur when used as secondary access. It was determined that yard is defined as a code with the SCC but further research was needed to finalize this question.

- Question # 2: If one required exit is to the exterior; can one exit lead back into the building?
See Question #1 response.
- Question#3: Alternatively, can one of the exits discharge into an adjacent yard which has a separate exit to the exterior?
It was determined that Yes. In regards to egressing through adjacent yards, the intervening rooms and travel distance requirements apply.
- Question#4: If recreation yards are covered, mostly enclosed, and sprinklered, are they considered exterior spaces which cannot exit into the building?
This discussion included Pods, Day rooms and Housing Units. A detailed discussion took place regarding whether the recreation yard is a dedicated exit, or part of an egress path. Specific exit requirements for when a recreation yard is on a roof or story above ground, such as in a high rise jail in a metropolitan area. It was determined that participants should email Andrew Henning with any information they are working on. This will assist with visuals for further group discussions.
- Question #5: In a detention housing tier, can one exit discharge through the adjacent tier as long as the primary exit is via a stair to the main level of the housing unit?
A discussion took place that questioned whether there is egress to adjacent pods from tiers. Further discussion took place regarding doors leading from one tier to the next and the challenges of adding a staircase, which creates a distance issue and additional security concerns. The consensus is not to go from pod to pod to pod. It was decided that tier definition and size needed addressed further. Manual release locking, as opposed to electric releases was discussed. It was determined that a comfort level exists for pod to pod removal via electronic release. It was also decided that smaller jails need to be addressed due to the occupancy threshold being an issue.
- Question #6: In a detention environment, can one of the required exits travel through a single adjacent space before reaching a rated exit (exterior exit, rated corridor, rated stairwell)?
A discussion ensued about the term corridor being a gray area. There was some clarification surrounding table 1018 that only required the exit to be a corridor. However other factors are determining that 1018 does not address along with 1014 that allows exits through intervening space. A discussion surrounding space turning into a corridor took place. It was questioned if an open staff station is on a corridor is separation required? What is part of the corridor? This would be similar to a nursing station. A pod control custody station needs separation from the inmate area they are observing. It was asked that the group provide clear documentation and code changes for clarity so the true intent is clear. Code and commentary including pictures and examples for the final report are required.
See Question #6, # 7, #8 response.
- Question#7: Is there any requirement that jail pods or inmate program rooms must exit into a rated corridor?
See Question #6 response.

- Question#8: Can jail pods or program rooms exit into a non-rated circulation space with a custody station at the center, with the circulation space visible from a staff station, and providing a discernable path to an exit?
See Question #6 response.
- Question #9: In a jail or prison housing unit, does the secure custody station require a 2-hour rated separation from the inmate areas it is designed to observe?
A discussion took place on whether a jail applies to NFPA 1221. Also, the question was asked on whether a CDCR central control area that takes 911 calls applies. Determination is needed on the difference between a control room and a dispatch area. It was also identified that unnamed areas have a minimum of one hour separation.
- Question #10: In a jail or prison program room, do closets serving that room (which are less than 100 Square Feet) need to be separated by 1-hour construction from the program room?
It was requested that justification was needed on model code change for 2012 IBC on why the specification is 100 square feet.
- Question #11: Are tiers held to the same area requirements as mezzanines?
No. The discussion reviewed the difference between mezzanines and tiers. Requirements in the past were that the design team does not see a tier as a floor or a mezzanine. Need to circumvent California Building Code (CBC) Section 601 as now the entire floor is poured. Waffle floors are currently 42% of the designs. This is a global issue that goes back into construction. The floor system needs to incorporate safety and smoke protection.
- Question #12: Are they limited to 1/3 of the area of the space in which they are located?
No. A tier can be up to 50% if the floor is rated CBC Section 601. A waffle floor can be used if the space is <1/3.
- Question #13: In a jail project, where the size of the rooms and spaces are dictated by 1231, must exiting loads be held to the requirements of Table 1004.1.2?

It was relayed that if this is the interpretation of CBC Section 1231 versus Chapter 10, the answer would be no. CBC Section 1231 states occupant limits, which is less than the number allowed per CBC Chapter 10. It was further discussed that this is not an issue in a dayroom.

Dayroom classification requires further clarification. The issue is in a 10x10 holding cell with 6 ft. benches holding up to 27 occupants. This would be holding cells in jails not in prisons. It was brought up that Program-Educator rooms within a jail cell are not defined in Chapter 10. Occupant load should be looked into to get a good baseline of the facts to take under consideration. There are some loadings that lead to contradictions that require further discussion.

Brain Storming

The working group started a brain storming document to start floating ideas of research and further discussions. The Brain Storming Document will then be merged into the matrix at a future meeting.

Specific code cleanup

- Area of Refuge:
- CBC 1027.5 vs 408.3.6
- Difference from an accessibility standpoint
- Intervening Spaces (How it's interpreted- Some are rated some are not)
- CBC Table 601- footnote B (20ft clear structure doesn't have to be rated?)Cleanup
- CBC 716.5.5-exception 5- says cells in the room-should allow holding cells-add clarity for smoke protection
- Stairs off the tier- 1/3 distance general guide CBC 1015.2.1.
- Prison Guard Towers-guard rail requirements (CAL OSHA)

I-3 vs I-2 Occupancies

- When can I-2 occupancies use restraints and locking doors (need to look at statute)
- Need a table to show differences between I-3 and I-2 occupancies
- What additional requirements need added for I-2 occupancies that are locked

Addresses Fire Protection Features-Smoke control brought up by Jeff Maddox- important to look at smoke control in housing areas. Why would this not only apply to housing area? Removed housing from 408.9- why did we do that? Sanjay speaks. Then Andrew- then Paul Menard, Andrew- Greg addresses code- maintenance of a tenable environment Spencer says to define Exterior/Parameters

General

- Preset engineering alternatives means and methods as an exception
- Interconnected floors with I-3;'s- stairs are not for I-3 areas

Smoke Control

- Housing area of windowless buildings
- Why is smoke control needed in program or other areas? Originally only in sleeping areas.
- JCC holding cells potential for 12 hours
- Define Exterior- Look at current exceptions and potentially expand Exceptions.
- Direct exterior exits (how long)
- Staffing sufficient to: Direct supervision and what level should this be. Rely on FA and cameras?
- High Rise-does this change things? Re-LA city's super high rise
- Add grading criteria for tenability report.
- Add appendix?

Fire Alarms

- New requirements within 2016 for NFPA 72

Court vs Jail vs Prison:

- Should there be requirements for different facility types? - Multi story vs single story
- Examples: exiting from one pod to another

Schedule Future Meeting Dates

- April 11th
- May 3rd - discuss at April meeting if meeting should be canceled
- June 7

- July 12
- August 9

All meetings will be at the OSFM, 1131 S Street, Sacramento, CA 95811. A conference call line and the GoToMeeting.

Next Meeting Task

- Make an “Issue List” and form subgroups so people can work on them away from the meeting and come back to the task group with suggestions.
- OSFM will provide access to the OSFM web page so the group can share and review information and documents relating to the task group.

Miscellaneous:

- All those on the email list, please email Andrew Henning your complete contact information so we can update the Roster.
- Final discussion: A track changes document will be sent out to all participants for formation of sub groups.
- Chief Hoover will evaluate the report and she will advise what data stays to make code changes better. The Working group will know what to determine for the 2016 codes.