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OFFICE OF THE STATE FIRE MARSHAL  
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Re: Adoption of IBC and IFC

This document is intended to communicate a “foundation” and philosophy to be used for the development of the fire and life safety provisions of the California Building and Fire Codes using the International Building and Fire Codes as the base document. The objective is to develop an adoption package that will include model code language from the 2006 IBC, IFC and IRC and current applicable California amendments. The process will utilize a holistic approach to public safety when developing the state construction codes and evaluating the proposed amendments to those codes. The process will begin utilizing the 2003 edition and supplement of the International codes and will be amended as the 2006 language is made available in October/November 2005. The intent is that the final adoption package will include amendments necessary to reasonably maintain a substantially equivalent level of fire and life safety in California.

The State Fire Marshal, by State Law, is responsible for the coordination of the State’s fire and life safety codes. The State Fire Marshal must review the proposed regulations of State Agencies that promote fire and life safety before the regulations can be submitted for approval.

According to a timetable being considered by the State Agencies, the entire SFM package will be submitted to the State Building Standards Commission in May 2006.

Because the timeframe is extremely short, given the task at hand, several crucial decisions must be made regarding the OSFM’s amendment package and the direction provided by the SFM to the other State Agencies that propose building standards as well as to the various stakeholders that have stepped up to assist the SFM in this effort.

Among the decisions to be made is the extent of amendment to the IBC and IFC that the SFM will propose based on recommendations from a Core Committee and various stakeholder groups. It is the intent of the OSFM that the new CBC and CFC will provide the “substantially equivalent level of protection” that we have enjoyed in our State, when viewed holistically.

It is the intent of the OSFM to utilize a “holistic” approach in evaluating the IBC vs. UBC and IFC vs. UFC in terms of the level of protection provided by these model codes. This approach would offer that both codes, while providing a minimum level of fire/life safety in distinctly different manners, when viewed “holistically” could be seen as substantially equivalent. One code’s reliance on the performance of fire-extinguishing systems and a

more performance-based approach, as opposed to prescribed built-in fire-resistive features and intentionally redundant fire protection provisions may make side-by-side comparisons difficult for even the most technically proficient professionals based on differing strategies of fire and life safety protections.

This approach requires that the comparison and subsequent amendment of the IBC to incorporate UBC or CBC provisions be done in a deliberate and thoughtful manner. Another result of this approach could be fewer State amendments, as the decision of which existing amendments to carry over could be made on a case-by-case basis. It also emphasizes a need to either participate in, or, at the very least, closely monitor development of the model code in order to assure the future safety of California.

Stakeholder participation and input will be requested throughout the entire process. The development and review process will include several levels of review. A core workgroup will include representatives from state agencies with statutory authority, California Building Officials Association and California Fire Service. The intent is that the first draft will be developed by those without a financial interest in the outcome of the code. Subsequent review(s) will incorporate design professionals and industry representatives.

The organization will be divided into workgroups primarily based on occupancy classification. There will also be an oversight committee that includes the Group Leaders. The oversight committee will work together throughout the process to assist groups in providing a consistent approach to equivalency. The OSFM will provide an overall project manager.

#### **Work Groups (including assigned articles)**

1. A-1, A-2, A-3, A-4, A-5
2. B
3. E, I-4
4. F-1, F-2
5. H-1, H-2, H-3, H-4, H-5, H-6, H-7, H-8 and Exceptions
6. I-1, R-4
7. I-2
8. I-3
9. M
10. R-1, R-2, R-3, R-6
11. S-1, S-2
12. U
13. Special Occupancies; High Rise, Malls, Atria, Smoke Control, Stages and Platforms
14. Roofs, Wine Caves, Fixed Guideway Transit Systems

#### **Control Objectives**

Provide an objective comparison of the SFM adopted CBC and CFC with the International Building, Fire and Residential Code. Evaluating the following comparative elements in a holistic evaluation of building design:

- Exiting
- Occupancy Group Definition
- Construction
- Height
- Area
- Location on Property

- Smoke Barriers
- Definitions
- Occupancy Separations
- Special Hazards
- Fire Protection Systems
- Interior Finishes

Identify necessary amendments. The format for the amendment package document will be in express terms. Justification for amendments will summarize the holistic evaluation by incorporating applicable comparative elements, i.e., if same, if new, if missing. Groups will develop a matrix that classifies an amendment in a manner as described below.

Group leaders will be requested to develop a training module that will serve to educate others on the changes to the new code. Training module can be drafted while working on amendments and finalized after the amendment package is adopted.

### **Stakeholders**

| <b><i>Core Group</i></b> | <b><i>Stakeholders</i></b>       |
|--------------------------|----------------------------------|
| SFM                      | Industry                         |
| OSHPD                    | AIA                              |
| DSA                      | CBIA                             |
| HCD                      | Cal Chamber                      |
| Cal Chiefs/FPO's         | Hotel/Motel                      |
| Cal BO                   | Pipeline                         |
| ICC                      | etc.                             |
| League Chiefs            | Product Groups                   |
| CSAC                     | Wood                             |
| Metro Chiefs             | Concrete                         |
| FDAC                     | Gypsum                           |
|                          | Steel                            |
|                          | etc.                             |
|                          | <b><i>Other Stakeholders</i></b> |
|                          | Disabled Community               |
|                          | Non-Profits                      |
|                          | NFPA                             |
|                          | etc.                             |

### **TimeLine**

Joint meeting July 13<sup>th</sup>, with FPO, BO's, ICC-recruit volunteers  
 Provide work groups to SFM on July 22<sup>nd</sup>  
 Kick off meeting—Aug 8-17<sup>th</sup>  
 Adoption package completed-March 2006

In order to allow for SFM review of the completed packages provided by the various stakeholder groups, a deadline for completing the stakeholder packages would be no later

than February 1, 2006. Stakeholder groups should expect to provide updates on their progress to the OSFM Code Development Unit.

### **The Code Adoption Plan**

By enlisting stakeholder groups to provide the first draft of the IBC-based code, the SFM will be assured of a consensus building process and recommendations for final consideration by the SFM that considers input from all stakeholders. Several groups have already begun this effort voluntarily.

Stakeholders will be encouraged to take specific chapters to work on depending on their areas of expertise. The function of these groups will be to identify the various amendments, categorize them according to the SFM's philosophical statement, assemble the list of code provisions proposed for repeal, produce the express terms of the proposed code, and develop the justification for each amendment based upon parameters outlined in the Building Standards Law and the Building Standards Commission.

The SFM Code Development Unit will establish the format for other State Agencies and each stakeholder group to follow. The Building Standards Commission is developing sample documents that may be used to pattern submittals. Strict adherence to the prescribed format is necessary in order for a seamless compilation of the various stakeholders' efforts.

The following categories are intended to provide insight on how to accomplish the "holistic" approach. It is a goal of this approach to minimize the number of amendments for this code adoption cycle:

Amendments will be classified into four categories:

- (1) Those that are statutory-driven, that exist because State Law required specific action by the State Fire Marshal,
- (2) Those that were developed under the SFM's authority, but not necessarily in response to a specific incident or legislative action, but are still needed to address an issue not addressed in the model code, and
- (3) Those that do not significantly impact fire and life safety, are no longer necessary due to the change in model code provisions, or no longer fit in the new base code because of format changes.
- (4) New amendments, those not currently in the CBC will be dealt with separately.

Those existing amendments in Category 1 will be moved to the appropriate location in the new model code. Wordsmithing, if necessary, must keep the regulation in conformance with the terms of the mandating statute. Justification for these amendments must contain at a minimum its statutory reference.

Category 2 amendments should be limited to those that address issues not covered in the model code and those necessary to address clearly identifiable fire/life safety issues. Examples of regulations addressing areas not covered in the model code include Motion Picture Production Studios, Fixed-rail Guideway Stations. An example of regulations addressing clearly identifiable fire/life safety issues include, amendments to NFPA 72, National Fire Alarm Code found in CBC Chapter 35.

Category 3 amendments are those the SFM would propose for repeal. Many existing amendments in the current code are no longer needed, or no longer fit the IBC-based

document because the two codes are not formatted identically and the model provisions have been addressed in a different manner. Reasons to place an amendment into Category 3 could include the inability to justify deviation from model code or, even more simply, that the time needed to research and qualify the necessity of the amendment did not justify the action.

Category 4 are new amendments which, if not considered, may result in significant fire or life safety issues.

The process of code adoption used by the State Building Standards Commission involves a tremendous amount of public participation. The OSFM will be actively participating in the various stakeholder group meetings and providing educational seminars on what to expect from the new code and how to use the document.

A handwritten signature in black ink, appearing to read "R. Grijalva". The signature is fluid and cursive, with a large initial "R" and a long, sweeping tail.

RUBEN GRIJALVA  
**State Fire Marshal**