



# CALIFORNIA BUILDING CODE (2006 IBC) PUBLIC PROPOSAL FORM

*PLEASE SEE REVERSE FOR INSTRUCTIONS ON SUBMITTING PUBLIC PROPOSALS. PROPOSALS MUST COMPLY WITH THESE INSTRUCTIONS.*

1) Indicate the format in which you would like to receive your Public Proposals Monograph (PPM), Report of the Hearing (ROH) and Final Action Agenda (FAA):

- Paper     \* CD     \*Download from ICC Website

(\*Note: A paper copy will not be sent to you if you have chosen the CD or Download format.)

2) PLEASE TYPE OR PRINT CLEARLY: FORMS WILL BE RETURNED if they contain unreadable information.

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3) \*Signature: \_\_\_\_\_  Signature on File (see over)

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4) Cost Impact: Indicate if this Proposal:  will  will not increase the cost of construction.

5) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym: IBC

If you have also submitted a separate coordination change to another I-Code, please indicate the code: \_\_\_\_\_  
(See back of this form for list of names and acronyms for the International Codes).

6) Revision to:  Section 707.14.1     Table \_\_\_\_\_     Figure \_\_\_\_\_

7) PROPOSAL Please check appropriate box:

- Revise as follows:     Add new text as follows     Delete and substitute as follows:     Delete without Substitution(s):

Show the proposed NEW, REVISED or DELETED TEXT in legislative format: ~~Line through text to be deleted.~~ Underline text to be added.

**Section 707.14.1 – Elevator Lobby** – An elevator lobby shall be provided at each floor where an elevator shaft connects more than three stories. The lobby shall separate the elevator shaft enclosure doors from each floor by fire partitions equal to the fire resistance rating of the corridor and the required opening protection. Elevator lobbies shall have at least one means of egress complying with Chapter 10.

**Exceptions:**

1. In office buildings enclosed elevator lobbies are not required at the street floor provided the entire street floor is equipped with an automatic sprinkler system in accordance with Section 903.3.1.1
2. Elevators not required to be located in a shaft in accordance with Section 707.2 are not required to have enclosed elevator lobbies
3. Where additional doors are provided at the hoistway opening in accordance with Section 3002.6. Such doors shall be tested in accordance with UL 1784 without an artificial bottom seal.
- ~~4. In other than Group I-3, and buildings having occupied floors located more than 75 feet above the lowest level of fire department vehicle access enclosed elevator lobbies are not required where the building is protected by an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2.~~
- ~~4.5.~~ Smoke partitions shall be permitted in lieu of fire partitions to separate the elevator lobby at each floor where the building is protected throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2.
- ~~5.6.~~ Enclosed elevator lobbies are not required where the elevator hoistway is pressurized in accordance with Section 707.14.2

PROPOSAL *Continued* (Attach additional sheets as necessary)

**8) SUPPORTING INFORMATION (State purpose and reason, and provide substantiation to support proposed change):**

The purpose of this proposed amendment is to delete Exception 4 to the requirement for elevator shaft door opening protection utilizing elevator lobbies since it basically exempts this protection feature for any building that does not qualify as a high-rise building, as well as for Group I-3 occupancies, when the building is protected by an automatic sprinkler system installed in accordance with NFPA 13 or NFPA 13R. We do not believe it is appropriate to exempt this very important protection feature which is intended to prevent smoke migration from floor to floor in multistory buildings via the elevator shaft hoistway even where a complete automatic sprinkler system is installed. It has been well documented that elevator hoistways are a prime pathway for smoke to travel from the fire floor to floors remote from the fire floor. This is due to the fact that the doors used to provide fire protection to the door openings in these hoistway enclosures are not smoke tight, even though they can resist the passage of fire. It has also been well documented that even in sprinklered fires large quantities of smoke are still generated and then migrate through the elevator hoistways to floors remote from the fire floor, causing potentially untenable conditions which threaten the occupants and their evacuation paths. This important protection feature should be provided not only in high-rise buildings but also in those buildings that are less than high-rise in height even when protected with an automatic sprinkler system.

We are also concerned that this exception allows the omission of elevator hoistway door opening protection when the building is protected with an NFPA 13R sprinkler system which is only a partial sprinkler system. This system will allow many concealed spaces and small rooms to be unsprinklered which could certainly result in very large quantities of smoke being produced before the fire is brought under control by the responding fire department. Since smoke has been documented to be the major killer in fires, it follows that adequate protection should be provided for the elevator shaft hoistway door openings to minimize the spread of smoke throughout the building via the elevator shafts, even during a sprinklered fire.

SUPPORTING INFORMATION *Continued* (Attach additional sheets as necessary)