

**SUPPLEMENT TO MAY 30, 2006**  
**INFORMATIVE STATEMENT OF REASONS**  
**FOR**  
**PROPOSED BUILDING STANDARDS**  
**OF THE**  
**OFFICE OF THE STATE FIRE MARSHAL**  
**REGARDING THE ADOPTION BY REFERENCE OF THE**  
**2006 EDITION OF THE INTERNATIONAL BUILDING CODE (IBC)**  
**WITH AMENDMENTS INTO THE 2007 CALIFORNIA BUILDING CODE**  
**CALIFORNIA CODE OF REGULATIONS TITLE 24, PART 2.**

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**Chapter 5**

**507.3**

SFM is proposing this amendment to delete the exception to this section which allows for unlimited height storage buildings. The exception utilized the term "rack storage facilities", which is not defined in the code. The lack of clear definitions could result in an interpretation to include other occupancies that have racks in them. Maintaining the exception could result in combustible loading and conditions that would hamper and limit the ability of emergency responders for access, rescue and fire-fighting purposes.

Additional amendments remove the Group A-4 assembly occupancy from those occupancy groups allowed to qualify as an unlimited area one story building in accordance with this section. This is entirely consistent with Section 505.2 of the 1997 UBC which does not allow any Group A occupancy to be of unlimited area based on these provisions of complete automatic sprinkler system protection and open space of at least 60 ft. in width around the entire building perimeter. Furthermore, exception #2 has also been deleted since it is only applicable to the Group A-4 occupancy which is being deleted.

The issue here is also one of life safety since the present IBC will allow an unprotected construction type of unlimited area for an assembly occupancy. Presently, the IBC will allow a Type IIIB (UBC Type III-N) construction one-story Group A-4 building to have a maximum area of 52,250 sq. ft. based on complete automatic sprinkler system protection and a 60 ft. wide open space provided around the entire building. These are the same conditions that would allow an unlimited area building in accordance with this section. By comparison, Type IIIA (UBC Type III-One hour) construction will allow a maximum area of 77,000 sq. ft. and Type IB (UBC Type II-F.R.) construction will allow the building to be of unlimited area. Thus, it would be more reasonable to let the general code provisions for allowable height and area regulate the Group A-4 buildings rather than permitting them to be of unprotected construction of unlimited area per Section 507.2 and subjecting the occupants to having to evacuate a building under fire conditions in which there are no fire resistance ratings provided for the structural elements.

Exception 3 is proposed to be removed in its entirety SFM is proposing this amendment to maintain the current level of fire/life safety provided by the CBC by deleting exception 3 which allows a Group A-1 and A-2 occupancies to be an unlimited area one story building. For these very large assembly buildings, some degree of passive built-in fire resistive protection must be provided to compartmentalize the building and help maintain its structural integrity.

The actions described above are reasonably necessary to carry out the purpose for which it is proposed. The rationale for these actions is to establish minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in occupancies that are addressed in the 2006 International Building Code and published as the 2007 California Building Code pursuant to Health and Safety Code Section 18949.2, 13108, 13113, 13114, 13131.5, 13143 and 17921.

## Chapter 7

### 707.14.1

SFM is proposing an amendment to require an elevator lobby once more than two stories are connected by an elevator shaft enclosure. SFM is proposing an amendment to delete existing IBC language and substitute the word high-rise. SFM is proposing an amendment to require approval by the code official in order to apply exception 6. This allows the code official to determine the need for an elevator lobby based on special conditions/requirements. Additionally SFM is bringing forward exception 7 from the 2001 CBC 1004.3.4.5. This amendment is consistent with the previous requirements contained in the 2001 California Building Code, which will maintain the fire and life safety policy of the SFM. The amendment does not have change in regulatory effect.

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### 710.7

SFM is proposing to adopt and amend this section of the 2006 IBC. 2001 CBC Section 713.10 requires smoke dampers at both ducted and unducted (air transfer) air openings in 1 hour fire resistance rated corridor walls. However, IBC Section 407.3 requires corridor walls in Group I-2 (Groups I-1, I-2, and I-3 in the 2001 CBC) occupancies to be constructed as a smoke partition which does not have a fire resistance rating. Since the 2001 CBC does not include the concept of a smoke partition, the above proposed modification will ensure that the current level of protection against smoke infiltration in corridors is maintained in both ducted and unducted (air transfer) air openings in corridor walls. Furthermore new exception 2 is taken from exception 2 of the IBC, Section 716.5.4.1 corridors for such openings in fire partitions.

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## Chapter 10

### 1013.3

SFM is proposing to adopt and amend this section of the 2006 IBC. SFM is proposing to eliminate the 8" opening the 2006 IBC would allow in a guard between 34 inches and 42 inches above an adjacent walking surface. The basis for this proposed amendment is contained in the November-December "Building Standards" publication of the International Conference of Building Officials (ICBO). ICBO has since merged with the International Code Council (ICC), the publisher of the 2006 IBC. The article was titled "Climbable Guards: The Special Enemy of the World's 2- and 3-year old Children." The article cites studies conducted with children of various ages negotiating various guard heights and types. The article further states that most two- and three-year old children have sufficient arm and shoulder strength to climb to a height of 34 inches and then fit through the 8-inch opening at the top of a guard which would be allowed by the 2006 IBC.

Additionally the ICC Code Technology Committee (CTC) has made similar reconditions to the IBC in the 2006 code cycle. Although the SFM proposed revisions are not exactly the same as proposed by the CTC, they do however accomplish the same result in reducing the opening size of the upper most portion of guards from 8 inches to 4 inches. The CTC has produced several reports and lists many resources used in their determinations which can be found at the following ICC web site <http://www.iccsafe.org/cs/cc/ctc/Climbable.html>.

These amendments are also consistent with the previous requirements contained in the 2001 California Building Code, which will maintain the fire and life safety policy of the SFM. These amendments do not have change in regulatory effect.

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### 1017.4

SFM is proposing this amendment to further clarify the restrictions on the use of a corridor as an air plenum as required by the California Mechanical Code. The restriction to 30 sq feet is consistent with previous requirements contained in the California Mechanical Code. CMC Section 407.4.1.3 Exception 1, permits air from corridors to serve toilet rooms up to 30 square feet. However, Title 24 accessibility requirements do not permit a toilet room of 30 square feet. Since virtually all toilet rooms entered from corridors must be accessible to persons with disabilities, this exception provides no benefit for these rooms. Therefore, SFM is revising the exceptions to allow air from corridors to serve toilet rooms and bathrooms up to 50 square feet. The exception applies only to toilet rooms and bathrooms since there is no reason to increase the minimum size of the other small room types identified in Section 1017.4 Exception No. 1. The ventilation requirements for toilet rooms and bathrooms will remain the same. A sentence stating that corridors shall not convey air if the corridor is required to be of fire resistive rated was added to be consistent with a similar requirement in 2001 CMC Section 602.1 and 2006 UMC Section 602.1.

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## Chapter 12

### CHAPTER 12 INTERIOR ENVIRONMENT

SFM is proposing adoption of this Chapter with amendment as shown below and in the Matrix Adoption Table.

#### **1203.1, 1203.2.1, 1203.3.2, 1203.4.2, 1203.4.2.1 1203.5, 1206.3.3, 1203.5, 1205.4.1, 1209.3**

SFM is proposing the amendment of these sections to provide the code user with the correct reference to the California Codes. The International Mechanical Code, International Plumbing Code and the International Energy Conservation Code are not proposed for adoption in California. The proposed amendment does not represent change in its effect from the 2001 Triennial California Building Standards Code and is being added for clarity. The proposed amendment does not represent change in its effect from the 2001 Triennial California Building Standards Code.

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## Chapter 30

### **3002.4 thru 3002.4.7a (3003.5a thru 3003.6.1a, 2001 CBC)**

SFM is proposing the amendment of this section by bring forth requirements for elevators. IBC does not currently address criteria in this chapter. These amendments are consistent with the previous requirements contained in the 2001 California Building Code, which will maintain the fire and life safety policy of the SFM. These amendments do not create a change in regulatory effect.

It should be pointed out that the elevator car size will be increased from the current 24-inch (610 mm) by 76-inches (1930 mm) as defined in the 2001 CBC to 24-inches (610 mm) by 84-inches (2135) to accommodate the standard size of an ambulance-type stretcher typically associated with a medical emergency. This increase will reflect the accommodation size shown in the 2006 IBC.

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### **3002.9 thru 3002.5 (3003.8 thru 3003.8.5, 2001 CBC)**

SFM is proposing to bring forth these amendments for consistency and uniformity of elevator operations. While the 2006 IBC elaborates on the construction features of elevator systems, the 2001 CBC reflects operational design criteria which have been used since it was first incorporated into the state Building Code (10-01-86) and has been utilized as an operational guideline for fire and emergency operations since that time.

The actions described above are reasonably necessary to carry out the purpose for which it is proposed. The rationale for these actions is to establish minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in occupancies that are addressed in the 2006 International Building Code and published as the 2007 California Building Code pursuant to Health and Safety Code Section 18949.2, 13108, 13113, 13114, 13131.5, 13143 and 17921.

### **3003.2.1 thru 3003.2.13 (3003.9.1 thru 3003.10, 2001 CBC)**

SFM is proposing to bring forth these amendments for consistency and uniformity of elevator operations. While the 2006 IBC elaborates on the construction features of elevator systems, the 2001 CBC reflects operational design criteria which have been used since it was first incorporated into the state Building Code (10-01-86) and has been utilized as an operational guideline for fire and emergency operations since that time.

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## **Appendix Chapter 1**

### **101.2**

SFM is proposing this to delete the exception which directs the user to the International Residential Code (IRC) as California is not adopting the International Residential Code. During this rulemaking the Department of Housing and Community Development was not able to propose adoption of the IRC as originally planned. The IRC and the International Building Code (IBC) contain different requirements in some areas as they relate to one- and two- family dwellings. In an effort to ease transition from the IBC to a future adoption of the IRC, SFM is proposing amendments to correlate some of the more critical elements into this rulemaking.

The actions described above are reasonably necessary to carry out the purpose for which it is proposed. The rationale for these actions is to establish minimum requirements for the prevention of fire and for the protection of life and property against fire and panic in occupancies that are addressed in the 2006 International Building Code and published as the 2007 California Building Code pursuant to Health and Safety Code Section 13143, 17920(b), 18949, 18949.2(b).