

SUPPLEMENT No 2 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.

Chapter 4

407.3

SFM is proposing this amendment to delete existing IBC language referencing smoke partitions and substitute fire partitions in its place. This is necessitated by the requirement for fire rated corridors. 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.

This requirement was first referenced in the 1981 State Building Code (Title-24, Part 2, Section 2-3304(g) and required that "Group A, E, I, C, and D Occupancies having an occupant load of more than six (6) persons have fire-resistive construction for corridors and exterior exit balconies". Subsequent editions of the State/California Building Code have brought forward this amendment.

It should be noted that Group L Occupancies has been added to this proposal to bring forward the provisions of the current H-8 provisions of the 2001 CBC (Table 5-A, Table 5-B, and Section 1004.3.4.3).

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.

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.

Table 1017.1(1004.3.4.3, 1007.6.1 2001 CBC)

SFM is proposing this amendment to include rated corridors for various occupancies. In addition, to add a footnote addressing and Group A occupancies. An over-reliance on fire sprinkler systems must not be used to justify the reduction of corridor ratings. Without fire rated corridors, there are no redundant mitigating protective features to address the potential for sprinkler failure due to a disruption in water supply, mechanical failure, lack of proper maintenance, human error, or temporary disruptions to sprinkler systems that occur. A recent article cites 89% as the figure when both the performance and operational reliability of sprinkler systems are factored in. There have been at least two major recalls of defective sprinklers. They are out of service for maintenance, construction (TI) and/or unintentional human error. There is also a vulnerability factor – besides seismic, we have experiences where systems were taken out by vehicle accidents or explosion. In addition, the fire rated corridor provides a protected area from which fire department personnel may operate when performing fire fighting operations. 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. In addition, SFM is proposing to add Group L occupancies. This amendment does not create a change in regulatory effect.

This requirement was first referenced in the 1981 State Building Code (Title-24, Part 2, Section 2-3304(g) and required that "Group A, E, I, C, and D Occupancies having an occupant load of more than six (6) persons have fire-restistive construction for corridors and exterior exit balconies". Subsequent editions of the State/California Building Code have brought forward this amendment.

It should be noted that Group L Occupancies has been added to this proposal to bring forward the provisions of the current H-8 provisions of the 2001 CBC (Table 5-A, Table 5-B, and Section 1004.3.4.3).

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.