

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
2525 NATOMAS PARK DR., SUITE 130  
SACRAMENTO, CA 95833  
(916) 263-0916 Phone  
(916) 263-0959 Fax  
Email: BSC@dgs.ca.gov

Office Use Item No. \_\_\_\_\_

**PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 2, 2009**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: NOVEMBER 16, 2009**

Date: November 12, 2009

From:

Larry G. Williams, FPO

Name (Print or type)

(Signature)

-- Ventura County Fire Protection District

Agency, jurisdiction, chapter, company, association, individual, etc.

165 Durley Avenue

Street

Camarillo

City

CA

State

93010

Zip

I/We do agree with:

[ X ] The Agency proposed modifications As Submitted on Section No. CBC **310**, FCF **425**, CRC **325**

and request that this section or reference provision be recommended:

[ ] Approved  [ ] Disapproved  [ ] Held for Further Study  [ X ] Approved as Amended

**Suggested Revisions to the Text of the Regulations:**

**NOTE: We are proposing Changes to CBC 310, 425.3.4, 425.8.3.1, 425.8.3.2, 425.8.3.3, 428.8.7.1, Table 503 and corresponding sections of CFC within 425 and CRC within 325, under the same issues discussed in our Reasons. Each will be under separate requests.**

Page 18

**310: R-2.1 This occupancy shall include buildings, structures or parts thereof housing clients, on a 24-hour basis, who because of age, mental disability or other reasons, live in a supervised residential environment that provides personal care services.**

**Group R-2.1 occupancies shall meet the requirements for construction as defined for Group R-2, except as otherwise provided for in this code.**

**This occupancy may contain more than six non-ambulatory and/or bedridden clients. (See Section 425 Special Provisions For Licensed 24-Hour Care Facilities in a Group R-2.1, R-3.1, or R-4 Occupancy). This group shall include, but not be limited to, the following:**

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Page 28/29

**425.8.7.1 Doors within floor separations.** *Doors within such floor separations shall be tight fitting solid wood at least 1 3/8 inches (35 mm) in thickness. Door glazing shall not exceed 1296 square inches (32 918 mm2) with no dimension greater than 54 inches (1372 mm). Such doors shall be positive latching, smoke gasketed and shall be self-closing or automatic closing by smoke detection.*

**Reason:** [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Self-closing doors provide the same protection as automatic closing doors and is an acceptable method for closing doors under Chapter 7.

### HEALTH & SAFETY CODE SECTION 18930

#### SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
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  - (3) The public interest requires the adoption of the building standards.
  - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
  - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
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**425.8.3.3 Group R-3.1 occupancies housing only one bedridden clients. In Group R-3.1 occupancies housing a bedridden client and not provided with an approved automatic fire sprinkler system, all of the following shall apply:**

- 1. In Group R-3.1 Occupancies housing a bedridden client, a direct exit to the exterior of the residence shall be provided from the client sleeping room.*
- 2. Doors to a bedridden client's sleeping room shall be of a self-closing, positive latching 1-3/8 inch solid wood door. Such doors shall be provided with a gasket so installed as to provide a seal where the door meets the jam on both sides and across the top. Doors shall be maintained self-closing or shall be automatic closing by actuation of a smoke alarm in accordance with Section 715.4.7715.4.8.*

3. *Group R-3.1 Occupancies housing a bedridden client, shall not have a night latch, dead bolt, security chain or any similar locking device installed on any interior door leading from a bedridden client's sleeping room to any interior area such as a corridor, hallway and or general use areas of the residence in accordance with Chapter 10.*
4. *The exterior exit door to a bedridden client's sleeping room shall be operable from both the interior and exterior of the residence.*
5. *Every required exit doorway from a bedridden client sleeping room shall be of a size as to permit the installation of a door not less than 3 feet (914 mm) in width and not less than 6 feet 8 inches (2032 mm) in height. When installed in exit doorways, exit doors shall be capable of opening at least 90 degrees and shall be so mounted that the clear width of the exit way is not less than 32 inches (813 mm).*

**Note:** *A sliding glass door can be used as an exterior exit doorway as long as it is operable from the inside and outside and the clear width of the exit way is not less than 32 inches (813mm).*

**Reason:** [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The additional language clarifies that this section is only applicable to R-3.1 occupancies without automatic fire sprinklers per Section 903.

#### HEALTH & SAFETY CODE SECTION 18930

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  - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
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    - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
    - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
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**Suggested Revisions to the Text of the Regulations:**

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**425.8.3.2 Group R-3.1 occupancies housing nonambulatory clients.** *In a Group R-3.1 occupancy, bedrooms used by nonambulatory clients shall have access to at least one of the required exits which shall conform to one of the following:*

- 1. Egress through a hallway or area into a bedroom in the immediate area which has an exit directly to the exterior and the corridor/hallway is constructed consistent with the dwelling unit interior walls. The hallway shall be separated from common areas by a solid wood door not less than 1 $\frac{3}{8}$  inch (35 mm) in thickness, maintained self-closing or shall be automatic closing by actuation of a smoke detector installed in accordance with Section 715.4.7715.4.8.*
- 2. Egress through a hallway which has an exit directly to the exterior. The hallway shall*

*be separated from the rest of the house by a wall constructed consistent with the dwelling unit interior walls and opening protected by a solid wood door not less than 1¾ inch (35 mm) in thickness, maintained self-closing or shall be automatic closing by actuation of a smoke detector installed in accordance with Section 715.4.7715.4.8.*

*3. Direct exit from the bedroom to the exterior, such doors shall be of a size as to permit the installation of a door not less than 3 feet (914 mm) in width and not less than 6 feet 8 inches (2032 mm) in height. When installed, doors shall be capable of opening at least 90 degrees and shall be so mounted that the clear width of the exit way is not less than 32 inches (813 mm).*

*4. Egress through an adjoining bedroom which exits to the exterior.*

**Note:** *A sliding glass door can be used as an exterior exit doorway from a client bedroom as long as it is operable from the inside and outside and the clear width of the exit way is not less than 32 inches (813mm).*

**425.8.3.2.1 Locks and Latches.** *Interior bedroom doors used as a means of egress for other client rooms under Section 425.8.3.2 shall not have a night latch, dead bolt, security chain or any similar locking device.*

**425.8.3.2.2 Group R-3.1 occupancies housing bedridden clients.** *In a Group R-3.1 occupancy housing bedridden clients and provided with an approved automatic fire sprinkler system, egress arrangements shall be in accordance with the requirements of Section 425.8.3.2 for nonambulatory clients.*

**Reason:** [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

1. Use a sliding glass door as the exterior exit door from a bedroom indicated for one bedridden client in Section 425.8.3.3 is also acceptable for the above egress options.
2. The addition of Section 425.8.3.2.1 clarifies that these doors are required egress doors and shall not be locked to the other clients that need to egress through another bedroom.
3. The addition of section 425.8.3.2.2 clarifies the egress arrangements bedridden clients in fire sprinklered R-3.1 occupancies as indicated in SFM Interpretation #08-073.

#### **HEALTH & SAFETY CODE SECTION 18930**

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***425.8.3.1 Egress through adjoining dwelling units shall not be permitted.***

**425.8.3.1.1 Atmospheric separation. Walls, without openings, shall be provided to separate common areas and bedrooms used by nonambulatory or bedridden clients.**

**Exceptions:**

- 1. Interior bedroom doors to adjacent hallway serving egress arrangements under Section 425.8.3.2 and 425.8.3.3 are permitted.**
- 2. Interior bedroom doors opening directly to common areas, other than adjacent hallway, shall be of a self-closing, positive latching 1- $\frac{3}{8}$  inch solid wood door. Such doors shall be provided with a gasket so installed as to provide a seal**

where the door meets the jam on both sides and across the top. Doors shall be maintained self-closing or shall be automatic closing by actuation of a smoke alarm in accordance with Section 715.4.7715.4.8.

3. Adjacent bathroom doors where the adjacent bathroom does not open to the common area of the dwelling unless protected in accordance with exception #2 above.

4. Ducted HVAC openings.

**Reason:** [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The current and proposed sections do not mandate a door within the door opening to bedrooms housing nonambulatory and bedridden clients, nor does it prohibit other wall openings, much less any wall at all. The intent of the special egress arrangements for nonambulatory and bedridden clients is to provide separation from smoke to the egress system and allow for the additional time that these persons will need to egress. If these bedrooms are also used for the egress from other rooms, the hallway to common area door required does not provide any protection if there are other wall opening between the common area and the bedroom used for the exterior exit by other clients. The same provisions to prevent or delay smoke intrusion in the egress system should be applied to the walls of rooms used for the same egress system. The proposed language would also now require a bedroom door.

#### HEALTH & SAFETY CODE SECTION 18930

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**Exceptions:**

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**2. Interior bedroom doors opening directly to common areas, other than adjacent hallway, shall be of a self-closing, positive latching 1- $\frac{3}{8}$  inch solid wood door. Such doors shall be provided with a gasket so installed as to provide a seal**

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Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: NOVEMBER 16, 2009**

Date: November 12, 2009

From:

Larry G. Williams, FPO  
Name (Print or type) (Signature)

-- Ventura County Fire Protection District  
Agency, jurisdiction, chapter, company, association, individual, etc.

165 Durley Avenue      Camarillo      CA      93010  
Street                      City                      State                      Zip

I/We do agree with:

[ X ] The Agency proposed modifications As Submitted on Section No. CBC **425.3.4**, FCF **425**, CRC **325**

and request that this section or reference provision be recommended:

[ ] Approved     [ ] Disapproved     [ ] Held for Further Study     [ X ] Approved as Amended

**Suggested Revisions to the Text of the Regulations:**

**NOTE: We are proposing Changes to CBC 310, 425.3.4, 425.8.3.1, 425.8.3.2, 425.8.3.3, 428.8.7.1, Table 503 and corresponding sections of CFC within 425 and CRC within 325, under the same issues discussed in our Reasons. Each will be under separate requests.**

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**425.3.4 Nonambulatory elderly clients.** *Group R-4 occupancies housing nonambulatory elderly clients shall be of not less than one-hour fire-resistance-rated construction throughout. see Health and Safety Code Section 13131.5.*

**Reason:** [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

This clarifies the building construction requirements of the Health & Safety Code based upon number of stories housing these clients and refers the reader to the proper H&S Section. Matching change also proposed for Table 503.

## **HEALTH & SAFETY CODE SECTION 18930**

### **SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS**

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
  - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
  - (3) The public interest requires the adoption of the building standards.
  - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
  - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
  - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
  - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
    - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
    - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
  - (8) The format of the proposed building standards is consistent with that adopted by the commission.
  - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.

(Note: Remaining text unchanged and omitted for this proposal)

**Reason:** [The reason should be concise if the request is for “Disapproval,” “Further Study,” or “Approve As Amend” and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The Code does not fully address all construction and building code requirements for R-2.1 occupancies. The additional language clarifies which building code requirements are applicable if not specifically addressed for R-2.1 occupancies.

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