

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 13, 2009

From:

Rick Thornberry, PE

Name (Print or type)

(Signature)

-- The Code Consortium, Inc. on behalf of Smoke Guard

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

2724 Elks Way

Street

Napa

City

CA

State

94558-3500

Zip

I/We ~~(do)~~(do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 708.14.1 Exceptions 3 of
Part 2

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:

708.14.1 Elevator Lobby

Exceptions:

3. Enclosed elevator lobbies are not required where additional doors are provided at the hoistway opening in accordance with Section 3002.6. Such doors shall comply with the smoke and draft control door assembly requirements in Section 715.4.3.1 when be tested in accordance with UL 1784 without an artificial bottom seal.

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I/We ~~(do)~~(do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 708.14.1 Exceptions 4 and 5
of Part 2

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:

708.14.1 Elevator Lobby

Exceptions:

4. 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.~~

This exception shall not apply to the following:

- 4.1 Group A occupancies;
- 4.2 Group E occupancies;

- 4.3 Group H occupancies;
 - 4.4 Group I occupancies;
 - 4.5 Group L occupancies;
 - 4.6 Group R-1, R-2 and R-2.1 occupancies; and
 - 4.7 High-rise buildings.
5. Smoke partitions shall be permitted in lieu of fire partitions to separate the elevator lobby at each floor where the building is equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 ~~or 9.3.3.1.2~~. In addition to the requirements in Section 711 for smoke partitions, doors protecting openings in the smoke partitions shall also comply with Sections 711.5.2, 711.5.3, and 715.4.8 and duct penetrations of the smoke partitions shall be protected as required for corridors in accordance with Section 716.5.4.1.

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 proposed amendment to Exceptions 4 and 5 to Section 708.14.1 of Part 2 as proposed by the California State Fire Marshal for the adoption of the 2009 ICC International Building Code is based on Item 3 of the nine point criteria in Health and Safety Code Section 18930 which reads: “The public interest requires the adoption of the building standards.”

The effect of the proposed amendments to Exceptions 4 and 5 of Section 708.14.1 Elevator Lobby is to eliminate the use of an NFPA 13R automatic sprinkler system for allowing the exception to the basic requirement for 1-hour fire-resistance rated enclosed elevator lobbies. Exception 4 would allow the complete elimination of the required elevator lobbies, whereas Exception 5 would allow the 1-hour fire-resistance rating for the elevator lobby fire partition to be eliminated and a smoke partition installed in lieu thereof. Both of these are building construction automatic sprinkler system trade-offs which should not be allowed for a life safety system such as NFPA 13R. These construction features are intended to minimize the spread of smoke throughout a multistory building via the elevator shafts by requiring the elevator shaft doors to open into a 1-hour fire-resistance rated elevator lobby enclosure.

NFPA 13R sprinkler systems are limited to buildings not greater than 4 stories in height. Therefore, these Exceptions would apply to a very limited building stock of residential occupancies which are impacted by the base requirement for buildings having more than 2 stories connected by the elevator shaft as having to meet the requirements for the 1-hour elevator lobby enclosure. Furthermore, Section 1.2.1 of the purpose of NFPA 13R states: “The purpose of the standard shall be to provide a sprinkler system that aids in the detection and control of residential fires and thus provides improved protection against injury, life loss, and property damage.” The Annex A note to Section 1.2 Purpose states the following:

“Various levels of sprinkler protection are available to provide life safety and property protection. This standard is designed to provide a high, but not absolute, level of life safety and a lesser level of property protection. Greater protection to both life and property could be achieved by sprinklering all areas in accordance with NFPA 13 which permits the use of residential sprinklers in residential areas.

“This standard recommends, but does not require, sprinklering of all areas in the building; it permits sprinklers to be omitted in certain areas...

“It should be recognized that the omission of sprinklers from certain areas could result in the development of untenable conditions in adjacent spaces...”

In addition, the Annex A note to Section A.1.1 Scope states the following:

“A sprinkler system designed and installed according to this standard cannot, however, be expected to completely control a fire involving fuel loads that are significantly higher than average for dwelling units (10 lbs/sf), configurations of fuels other than those with typical residential occupancies, or conditions where the interior finish has an unusually high flame spread index (> 225)... Conditions that allow the fire to grow beyond that point before sprinkler activation or that interfere with the quality of water distribution can produce conditions beyond the capabilities of the sprinkler system described in this standards. Unusually high ceilings or ceiling configurations that tend to divert the rising hot gasses from sprinkler locations or change the sprinkler discharge pattern from its standard pattern can produce fire conditions that cannot

be extinguished or controlled by the systems described in this standard.”

The NFPA 13R sprinkler standard also allows for sprinklers to be omitted in combustible concealed spaces such as attics and floor/ceiling assemblies, as well as other areas permitted by Sections 6.6.2 through 6.6.7 of NFPA 13R-2010.

In conclusion, since an NFPA 13R sprinkler system is not as effective in controlling and/or extinguishing fires as an NFPA 13 sprinkler system, it does not appear reasonable nor prudent to allow the NFPA 13R sprinkler system to be used to trade-off the 1-hour fire-resistance rated enclosed elevator lobby in multistory buildings.

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 proposed amendment to Exception 3 to Section 708.14.1 of Part 2 as proposed by the California State Fire Marshal for the adoption of the 2009 ICC International Building Code is based on Item 3 of the nine point criteria in Health and Safety Code Section 18930 which reads: “The public interest requires the adoption of the building standards.”

The proposed language being added to this Exception is essential in order for the additional door installed in front of the elevator hoistway door opening to perform as intended to minimize the movement of smoke from floor to floor via the elevator hoistway. The proposed new language provides the criteria to which the door must be tested in accordance with UL 1784 as required by this section. Without this additional language, there is no performance criteria to which the door must perform. In other words, the door is required to be tested to UL 1784 but is not required to meet any performance criteria. So the door could have significant air (smoke) leakage which would be in excess of that specified for other doors that are used in the elevator lobby enclosure, for example.

It should be noted that this issue is in the process of being corrected in the current ICC code development cycle for the 2012 edition of the International Building Code by Code Change FS47-09/10 submitted by Underwriters Laboratories, Inc. It was approved as submitted by the ICC IBC Fire Safety Code Committee at the recent ICC Code Development Committee Public Hearings held in Baltimore, MD.

The Reason statement for that code change proposal is as follows:

“As written, Exception 3 does not contain requirements for the allowable air leakage for this additional door, it just describes the test method to be used to measure the leakage. The proposed language fixes this hole in the code by referencing the maximum air leakage requirements in Section 715.4.3.1. A similar reference to 715.4.3.1 is used for smoke and draft control doors protecting the lobby of the Fire Services Access Elevator in Section 3007.4.3.1.”