

**SVABO CODE DEVELOPMENT COMMITTEE
PROPOSED CHANGES TO THE 2009 EDITION OF THE CBC**

GENERAL

ITEM#	SECTION	POSITION	COMMENTS
G-1	202,419.1	Support	Adds definition of Live/Work unit to chapter 2 because the term is used in several locations in the code.
G-18	306.2	Oppose	Seeks to classify commercial kitchens as F-1 occupancies because in the proponent's opinion they are similar to bakery and food processing facilities. I disagree, it is an unnecessary change. You cannot have a restaurant without a commercial kitchen.
G-19	306.2, 311.2	Support	Reclassifies Motor vehicle repair garages complying with the maximum allowable quantities of hazardous materials listed in table 307.1(1) (see Section 406.6) the reason statement sounds like it makes sense based on the description of the two occupancy groups.
G-25	309.1	Watch	Adds some exceptions to M occupancies less than 50 occupant load reclassifies as B occupancy.
G-66	407.3	Support	Defines when doors in corridors need to be rated (comply with 715.4) and when they can be unrated without self closing devices. This change clarifies that rated doors are not required in unrated corridors.
G-76, G-77, G-78, G-79, G-80	419.1, 419.1.1, 419.3, 419.7, 419.9	Watch	All apply to 419 Live/Work units. None of them seem to be in conflict with our proposed change. G78 by the original proponent of the section adds a limitation of 49 occupants to the nonresidential area. G77 would limit the Live/Work unit to B or M occupancy.
G-81	420.2, table 503, Table 508.4, 509.5, 509.6, 705.11, 707.3.10, 709.3, 709.4, 717.3.2, 717.4.2	Oppose	Significant changes to table 503, proposed by National Concrete Masonry Association. Would require that all I-1, R-1 and R-2 occupancies be constructed of non-combustible construction and rated separations between residential units be 2 hour rated.
G-82	424 (new)	Oppose	Adds a new section 424 Tenant Separations. The most significant is the requirement for all tenant spaces to be separated by fire partitions if two or more exits are required.

G-92	504.2, 506.3	Watch	This is a change to 504.2 and appears to make an attempt at eliminating double dipping for the use of fire sprinklers.
G-99	506.3	Watch	Allows area increase even if sprinklers are not installed as long as the roof is framed with fire retardant wood. Proposed by American Forest and Paper Association.
G-100	506.4.1	Watch	Would allow the first floor of a multi story building to be as large as a single story building as long as the total square footage did not exceed the total square footage allowed for a multi-story building.
G-118	Table 508.4	Watch	Deletes the entire Table 508.4 and replaces it with a new one. One of the most notable changes is that the table now separates all of the different occupancy groups into individual rows and columns. The existing table has 19 columns and 10 rows. The proposed table has 26 columns and 26 rows. The table makes significant increases in separation requirements. The proponent attempts to restore the previous Table 302.3.2 from the 2003 IBC. The proponent argues that a change that was approved for the 2006 IBC on the basis that if presented no significant changes, when it actually included over 100 changes in fire resistance ratings.
G-122	Table 508.4, 303.1	Support	Addresses the confusion concerning the exception to occupancy separation regarding commercial kitchens. The change eliminates the exception as unnecessary.
G-123	Table 508.4	Oppose	This change requires occupancies that do not require a separation be separated by full height partition, fire partition, fire barrier, smoke barrier, fire walls, rated or non-rated horizontal assemblies or other approved means.
G-124	Table 508.4	Oppose	Increases the occupancy separation between R occupancies and all other occupancies to 2 hours. (National Concrete and Masonry Association)
G-125	Table 508.4	Watch	Attempts to address an inconsistency in Table 508.4 where no separation is required between B/M/U occupancies and F-1/S-1 (moderate hazard), while a 2 hour separation is required between B/M/U and F-2/S-2 (low hazard). The inconsistency seems to be based more on allowable area than occupancy types.
G-137	Table 602	Support	Eliminates the fire resistance rating for R3 and U when accessory to R3 where fire separation distance is over 5 feet. Also provides an exemption for wall and opening protection on structures that do not require a permit.

G-145	1203.2, R806.2	Oppose	Increases the ventilation requirements for cathedral ceilings. This should be “Where deemed necessary by the building official due to atmospheric conditions” There are so many different climate zones in the US that one specific code on attic and foundation ventilation is not good code.
G-146	1203.2, R806.1	Support	Reinstates “Where deemed necessary by the building official due to atmospheric conditions” language in 1203.2 for ventilation in attic spaces. The ventilation requirements need to be based on climate zone. This is a necessary improvement.

EGRESS

ITEM#	SECTION	POSITION	COMMENTS
E-1	1001.4 (new)	Oppose	This proposal attempts to adopt the Fire Safety and Evacuation Plan requirements of the International Fire Code sections 402.1 and 404 into chapter 10 of the IBC. This is essentially the same proposal we (SVABO) testified against in Minnesota and were successful overturning at the same FAH. Adoption of these provisions into the IBC will cause confusion who has enforcement authority, the building official or the fire official. Additionally, the Fire Safety and Evacuation Plan requires elements not generally part of the Building Officials training and the Plan is a live document requiring regular maintenance that would normally occur in the Fire departments annual inspection activities.
E-2	1002.1	Oppose	Revises definition of CORRIDOR. With current code allowances for non-fire rated construction when sprinklers are installed, I’m not sure the corridor definition is all that relevant; however, I don’t think this proposal improves the situation.
E-3 & E-4	1002.1	Support E-4	Both will revise the definition of EXIT. E4 is more comprehensive and better defines the term as it relates to other provisions in code.
E-5	Many	Watch	Extensive code change revising the term exit, adding or defining other egress component terms, and incorporating those changes where they impact numerous sections throughout code.
E-6	1002.1 (Many)	Oppose	Will add the term EXIT ACCESS “POINT” and incorporate term throughout code in titles and text when considering exit access. Proposal does not improve code and I think creates additional confusion.
E-8	1002.1	Oppose	Will add additional definitions for Projected Tread Depth, Nosing Protection, and Riser. Does not appear to improve code. Unnecessary.

E-17	1004.3	Oppose	Revises Posting of Occupant load to require “Maximum” occupant load of room or space posted. Also clarifies sign text size and posting height. Sign characteristic are an improvement, however posting only the “maximum” load is a problem. The maximum loading will change depending on configuration in multi-purpose facilities.
E-24 & E-25	1005.2 (many)	Support E-24	Clarifies code for doors, handrails and other protruding objects into egress path. E-24 is more comprehensive.
E-53	1008.1.2	Support	Clarifies door swing for doors serving room or space with an occupant load of 50 or more. Change will be consistent with ICC commentary.
E-60	1008.1.9.3	Oppose ??	Change would require deadbolts on ALL side hinged doors providing access to individual dwelling units or sleeping units of Group R occupancies. Expects dwelling to garage doors where garages are properly secured. ALL doors could be an issue.
E-62	1008.1.9.3	Oppose	Change would allow doors serving outdoor areas serving an occupant load of less than 300 to be equipped with key-operated locking devices. Proposal also requires signage on building and two-way communication. Signage on building is awkward for an outdoor area and two-way communication “with who”.
E-64	1008.1.9.4	Support	Change would allow manually operated surface or flush bolts for the inactive leaf of a pair of doors if building is equipped with fire sprinklers and inactive leaf is not required for egress.
E-67	1009.1	Support	Provided “charging language” for section 1009.
E-69	1009.1, 1009.12, 1013.2	Oppose	Revises stair width, handrail, and guard heights for industrial sites and construction site trailers. Stair width and guard height appears OK, but handrail requirements could be better defined.
E-70	1009.4	Watch	Deletes carpet from list of excluded materials for measurement of stairs treads and risers. (rugs and runners remain)
E-71	1009.4	Watch	Revises section deleting exclusion and adding <u>inclusion</u> of carpets, rugs and runners.
E-72	1009.4	Watch/Oppose	Adds approximately 200 words to section including new exception on how to measure stair treads and risers. (Jake Pauls)
E-74	1009.4.2	Your Pleasure	Changes stair rise/run to 7”/11” for R3 occupancies. May present problems for remodels or some additions.
E-76	1009.5	Support	Clarifies landing measurement requirements for stairs with straight run.
E-77	1009.5	Support	Clarifies landing measurement requirements for curved stairs.
E-78 & E79	1009.10.2	Support E-79	Good clarification for tread measurement for treads of alternating tread devices.
E-80	1009.1.2,1010.8, 1028.13	Watch	Proposal; to separate handrail requirements for stairs and aisles. Appears sound concept, but text changes appear confusing.
E-81	1009.12	Oppose	Would allow handrail on one side only of stairs providing access between stage and assembly seating. (These could be accessible stairs??)

E-82	1009.12	Oppose	Change would delete exception #3 for decks, patios, & walkways with a single rise with landings on each side. This would require handrails for all elevation changes with a single rise.
E-83	1009.12	Oppose??	Adds a new exception to handrail requirements: "At individual dwellings and their accessory structures, exterior stairways that are located on grade and do not provide the only means of egress to the public way do not require a handrail". (This appears to be considering concrete stair on sloping grade) Is this necessary??
E-84	1009.12	Oppose	Adds new exception to handrail requirements that would allow use of other building elements that may have graspability. (i.e access to dais or judges bench, witness stand) limited to one or two risers.
E-86	1009.13	Support	Requires ladder type extensions at roof hatches. Text is a little awkward.
E-89	1011.2, 1011.4, 1011.5.3		Revises exit sign illumination to require internally & externally illuminated signs to be illuminated at all times, 24/7. An exception is also added to allow the signs not to be illuminated if the building is not occupied with approval of the building official.
E-90	1011.2	Support	Adds new section specifying the location of EXIT signs: 12" above door leaf and 10" max above floor for directional signs where no door exists.
E-91	1011.2	Oppose	Adds requirement for low-level exit signs in corridors serving guest rooms of R-1 occupancies.
E-93	1011.6		Change would require self-luminous or photoluminescent exit signs on all exit and exit access doors in addition to already required exit signage. Bottom of sign shall be mounted within 6-18" of floor.
E-98	1012.3	Support	Revision adds a minimum cross-section dimension for Type I handrails that was missing from existing text.
E-101	1013.2	Support	Provides for 36" high guards in R-3 and individual dwelling units of R-2 that are three stories or less in height.
E-103	1014.2	Watch	Establishes additional exit requirements for A& E occupancies where rooms or spaces have an occupant load in excess of 500. These include a direct exit, one-hour corridor, and smoke protected egress.
E-105	1014.3	Support	Revises common path of egress travel text and references a new table with the maximum common path of travel distances based on occupancy. This is an editorial change to simplify code administration.
E-115	1018.2	Support	Revise corridor width and six exceptions to a new table.
E-117	1018.6	Watch	Adds a sentence intended to clarify how the fire-resistance rating of a corridor is maintained from the corridor to an exit where and unenclosed exit access stairway or ramp is allowed and occurs along the path of egress travel. HUH???

E-124	1022.3	Support	Clarifies opening and penetration requirements for exit enclosures. Clearly eliminates any communicating openings, protected or not, between adjacent exit enclosures.
E-136	1027.1	Watch	Adds an exception allowing an exit enclosure to terminate in a court if the court has at least one exit that provides an exit passageway of the same fire-resistive rating as the enclosure or a covered walkway open to the atmosphere at each end with fire-resistive rated walls.

STRUCTURAL

ITEM #	SECTION	POSITION	COMMENTS
S26-09/10	1509.1,1509.2.4	Support	Submitted by the Tri-Valley Chapter this code section is modified to add rooftop mounted enclosure such as mechanical equipment screens into the definition of “roof top structures”.
S29	1510.3	Oppose	This code change permits single ply membrane roofing material to be overlaid over an existing roof regardless of the number of previous roofs.
S38	1604.4	Oppose	Tries to redefine “load path” to include a new product that is not currently approved by ICC.
S42	Table 1604.5	Watch	Makes changes to the design category for emergency shelters and reclassifies schools into a higher classification for design category. See reason statement.
S46	1604.11 (New)	Oppose	Includes a clarification of patio cover design loads. However, the remaining definitions and requirements for the patio cover are still in the appendix.
S55	106.1, 1607.1.1	Watch	Clarification of where live loads shall be posted within a building. The new requirement would require posting on each floor, not each room as previously approved by ICC.
S93	1612.5	Watch	Requires breakaway walls and their connections to be designed in accordance with ASCE7.
S216-09/10	Table 2308.12.4, 2308.12.4.1 (New)	Support	Subject is alternate bracing and Table 2308.12.4. See reason statement. The purpose of this addition is to clarify that alternate braced wall panels may be substituted for braced wall panels in Seismic Design Categories D and E. In addition the proposed code addition further clarifies that an alternate brace wall panel is equal to one section of brace wall panel or portion thereof when used in Seismic Design Categories D and E

S117	1704.1	Support	Subject deletion of exception to special inspection. Reason Statement. Deleting exception would remove confusion. The exception creates undefined terms. (Vote for)
S118	1704.1	Oppose	Subject new exception for special inspection of conventional construction. Not necessary Not needed since special inspection is not called for conventional construction. Just creates unnecessary wording (vote no)
S126	1704.15 (New), 1704.15.1 (New), 1704.15.2 (New), Chapter 35	Watch	Subject new section requiring special inspection of fire resistant penetrations and joints.
S127	1704.15 (New), Chapter 35	Watch	Subject new section requiring special inspection of fire resistant penetrations and joints.
S128	1704.15 (New), Chapter 35	Watch	Subject new section requiring special inspection of fire resistant penetrations and joints.
S139	1710.2, 1710.3	Watch	Subject deletion of conditions mandating structural observation. Leave statement allowing BO to determine structural observation
S146	1801.1; IEBC 1202.2	Oppose	Subject foundations for temporary structures. Open ended without clear protection ...self serving for industry
S169	1910.2 (New)	Oppose	Subject Patio cover slab and footing requirements. Uplift could be a factor and reinforcement and attachment are not defined
S206	2304.13 (New)	Oppose	Marking of prefabricated wood I-joists or trusses for floor and roof systems. Not necessary. Appears to be industry against industry

FIRE SAFETY

ITEM #	SECTION	POSITION	COMMENTS
FS4	703.4 (New)	Watch/Support	703.4 Automatic sprinklers. The fire resistance rating of a building element, component or assembly shall be established without the use of automatic sprinklers or any other fire suppression system being incorporated as part of the assembly tested in accordance with the fire exposure, procedures, and acceptance criteria specified in ASTM E119 or UL 263. Comment: Unsprinkled buildings and buildings with failed sprinkler systems may be most in need of having fire-rated assembly meet the listed fire performance.

FS6	703.5.1 (New)	Watch/Support	703.5.1 Testing. Glazing shall be considered to comply with this section only if it has been tested in accordance with ASTM E 119 or U L 723 without use or consideration of a fire suppression system. Comment: Unsprinkled buildings and buildings with failed sprinkler systems may be most in need of having fire-rated assembly meet the listed fire performance.
FS9	704.2, 704.3, 704.4	Watch/Support	Clarifies intent of code by specifically listing exceptions to individual protection for columns and secondary members to note “members complying with Section 602.4, 721.1 or 721.6.3”.
FS12	705.2, Table 705.2 (New), 705.2.3	Support	Simplifies Table for determining minimum projection clearance and protection due to proximity to lot lines. There are other proposals that also attempt to simplify projection requirements, but this one is by far the simplest.
FS16	705.5, 705.5.1 (New)	Watch/Support	Codifies and clarifies the use of fire blocking in lieu of the inside membrane of a fire-rated exterior wall where it is interrupted by a floor/ceiling or roof/ceiling assembly.
FS17	705.6	Support	Clarifies intent for protection of interior structural members supporting exterior walls requiring fire rating specified by Table 601. Support FS17 over FS18 which is extremely lengthy and overly complex.
FS18	705.6	Watch/Oppose	Support FS17 over FS18 which is extremely lengthy and overly complex.
FS19	705.8.1	Oppose	No statistical support is provided to show that the current code is has caused any significant problems and the proposed code is ambiguous in that it requires that openings be “proportionally spaced” but doesn’t provide any method for how to determine sufficient proportional spacing.
FS20	705.8.6	Oppose	The proposed code is bad because the base code would require the evaluation of walls, openings and protectives on buildings located on lots adjacent to the project in order to determine the requirements for the project building. This would greatly complicate the design and plan review of project buildings because compliance and design is contingent on the design of adjacent buildings.
FS25	706.3.1	Oppose	Proposes only non-combustible materials to be permitted within type V-N fire walls. Proposed by special interest group (Masonry) but the proposal fails to provide any statistical justification showing that the current code has caused any significant problems while the proposal would increase the complexity and cost of construction.
FS29	707.3.8, 901.7; 901.4.3	Watch/Support	Clarifies code and reconciles building code with fire code.
FS40	708.14.1	Watch	Proposes to required elevator lobbies where an elevator shaft enclosure connects more than two stories instead of three stories as currently permitted. No statistical support is provided to show that the current code is has caused any significant problems that would warrant a code change.

FS54	708.14.1	Watch/Oppose	Proposes to eliminate elevator lobbies in Group B occupancies in buildings not greater than 420-feet in height above lowest level of fire department vehicle access. However, the statistical analysis specifically excludes the fires in World Trade Center 1993 & 2001 and the Murrah Federal Building in 1995 without rationale—events should not be excluded from a statistical analysis simply because they don't support the proposal.
FS55	708.14	Support	Codifies the reason why elevator lobbies are required which helps code officials apply elevator lobby requirements appropriately widely varying conditions.
FS56	Many sections	Watch	Wide ranging code changes and section renumbering. ICC CTC is the proponent.
FS75	713.4.1.2	Support	Codifies the practical application of the code by clarifying that ceiling membrane of 1 and 2 hour fire-rated ceilings may be interrupted by the double top-plate of a supporting wall so long as penetrations are treated with appropriate firestop assemblies.
FS76	713.4.2.3	Watch/Oppose	Code is very poorly written because it doesn't differentiate between penetrating items.