

PETITIONS RECEIVED - 2009 USBC, SFPC

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Virginia Chapter International Association of Electrical Inspectors

"Let the Code Decide"

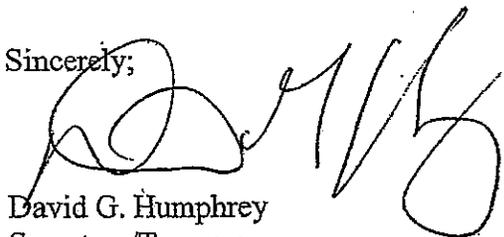
September 28, 2010

Mr. Steve Calhoun,
600 East Main Street
Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun,

Pursuant section 2.2-4007.06 code of Virginia, the Virginia Chapter of the International Association of Electrical Inspectors and citizens of the Commonwealth as represented by the attached signatures respectfully submit this request to open public comment on section 13VAC5-63-210 M 68. *"Deletes a new requirement in the 2009 IRC for wires in a crawlspace to have to be fastened on running boards to maintain the requirements of the 2006 IRC"*

Sincerely;



David G. Humphrey
Secretary/Treasurer
Virginia Chapter IA EI

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: _____

Proponent Information

(Check one): Individual Government Entity Company

Name: DHCD Staff (at the direction of the Codes and Standards Committee)

Representing: _____

Mailing Address: _____

Email Address: _____ Telephone Number: _____

Proposal Information

Code(s) and Section(s): VCC, IRC Section E3802.4

Proposed Change (including all relevant section numbers, if multiple sections):

Change Section E3804.2 of the 2009 IRC as follows:

E3802.4 In unfinished basements and crawlspaces. Where type SE or NM cable is run at angles with joists in unfinished basements and crawlspaces, cable assemblies containing two or more conductors of sizes 6 AWG and larger... (remainder of section unchanged).

Supporting Statement (including intent, need, and impact of the proposal):

The 2008 NEC and the 2009 IRC electrical provisions added a new requirement for supporting electrical cables in a crawlspace either by running them through holes in the floor joists or by installing running boards. Both of these processes require much additional work and are very difficult to do in a typical crawlspace due to the limitations in working space. Crawlspaces are not typically accessible to the extent that protection of these conductors is necessary as they would be in a basement; therefore, this new requirement, which could add a substantial installation cost, is not warranted. This proposal simply keeps the 2006 IRC provisions intact. There is debate over the new requirement in the NEC adoption process and it appears that the 2011 NEC will have an exception for crawlspaces less than four and one-half feet in height. If that exception passes for the NEC, then it could be considered for the 2012 IRC and the 2012 USBC; however, for the 2009 USBC, it is best to just delete the new requirement and keep the 2006 requirements while the issue continues to be debated at the national level.

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150

Regulations

~~P3202.3.4 Piping. Discharge piping shall meet the requirements of Sections P3002.1, P3002.2, P3002.3 and P3003. Discharge piping shall include an accessible full flow check valve. Pipe and fittings shall be the same size as, or larger than, pump discharge tapping.~~

50. Add Section G2425.1.1 to read:

~~G2425.1.1 Equipment changes. Upon the replacement or new installation of any fuel-burning appliances or equipment in existing buildings, an inspection or inspections shall be conducted to ensure that the connected vent or chimney systems comply with the following:~~

- ~~1. Vent or chimney systems are sized in accordance with this code.~~
- ~~2. Vent or chimney systems are clean, free of any obstruction or blockages, defects or deterioration and are in operable condition.~~

~~Where not inspected by the local building department, persons performing such changes or installations shall certify to the building official that the requirements of Items 1 and 2 of this section are met.~~

51. [~~35- 67.~~] Add Section E3501.8 E3601.8 to read:

~~E3501.8 E3601.8 Energizing service equipment. The building official shall give permission to energize the electrical service equipment of a one- or two-family dwelling unit when all of the following requirements have been approved:~~

- ~~1. The service wiring and equipment, including the meter socket enclosure, shall be installed and the service wiring terminated.~~
- ~~2. The grounding electrode system shall be installed and terminated.~~
- ~~3. At least one receptacle outlet on a ground fault protected circuit shall be installed and the circuit wiring terminated.~~
- ~~4. Service equipment covers shall be installed.~~
- ~~5. The building roof covering shall be installed.~~
- ~~6. Temporary electrical service equipment shall be suitable for wet locations unless the interior is dry and protected from the weather.~~

52. Add the following referenced standards to Chapter 43:

Standard reference number	Title	Referenced in code section number
ASTM C4-03	Specification for Clay Drain Tile and Perforated Clay Drain Tile	P3202.3
ASTM C508-00	Specification for Asbestos-Cement Underdrain Pipe	P3202.3
ASTM D2729-96a	Specification for Poly (Vinyl Chloride) (PVC) Sewer Pipe and Fittings	P3202.3
ASTM E2178-03	Standard Test Method for Air Permeance of Building Materials	R202
ASTM F405-97	Specification for Corrugated Polyethylene (PE) Tubing and Fittings	P3202.3
CSA B182.1-02	Plastic Drain and Sewer Pipe and Pipe Fittings	P3202.3
CSA B182.6-02	Profile Polyethylene Sewer Pipe and Fittings for Leak-Proof Sewer Applications	P3202.3
CSA B182.8-02	Profile Polyethylene Storm Sewer and Drainage Pipe and Fittings	P3202.3

[~~68.~~ Change Section E3802.4 to read:

E3802.4 In unfinished basements. Where type SE or NM cable is run at angles with joists in unfinished basements, cable assemblies containing two or more conductors of sizes 6 AWG and larger and assemblies containing three or more conductors of sizes 8 AWG and larger shall not require additional protection where attached directly to the bottom of the joists. Smaller cables shall be run either through bored holes in joists or on running boards. NM cable installed on the wall of an unfinished basement shall be permitted to be installed in a listed conduit or tubing or shall be protected in accordance with Table E3802.1. Conduit or tubing shall be provided with a suitable insulating bushing or adapter at the point the where cable enters the raceway. The NM or SE cable

sheath shall extend through the conduit or tubing and into the outlet or device box not less than 1/4 inch (6.4 mm). The cable shall be secured within 12 inches (305 mm) of the point where the cable enters the conduit or tubing. Metal conduit, tubing, and metal outlet boxes shall be connected to an equipment grounding conductor.

69. Change Section E3902.11 to read:

E3902.11 Arc-fault protection of bedroom outlets. All branch circuits that supply 120-volt, single phase, 15-ampere and 20-ampere outlets installed in bedrooms shall be protected by a combination type arc-fault circuit interrupter installed to provide protection of the branch circuit.

Exceptions:

1. Where a combination AFCI is installed at the first outlet to provide protection for the remaining portion of the branch circuit, the portion of the branch circuit between the branch-circuit overcurrent device and such outlet shall be wired with metal outlet and junction boxes and RMC, IMC, EMT or steel armored cable, Type AC meeting the requirements of Section E3908.8.

2. AFCI protection is not required for a branch circuit supplying only a fire alarm system where the branch circuit is wired with metal outlet and junction boxes and RMC, IMC, EMT or steel armored cable Type AC meeting the requirements of Section E3908.8.]

13VAC5-63-220. Chapter 4 Special detailed requirements based on use and occupancy.

A. [Delete Section 403.4.4 of the IBC.

B.] Add Section 407.8 [407.9 407.10] to the IBC to read:

407.8 [407.9 407.10] Special locking arrangement. Means of egress doors shall be permitted to contain locking devices restricting the means of egress in areas in which the clinical needs of the patients require restraint of movement, where all of the following conditions are met:

1. The locks release upon activation of the fire alarm system or the loss of power.
2. The building is equipped with an approved automatic sprinkler system in accordance with Section 903.3.1.1.
3. A manual release device is provided at a nursing station responsible for the area.
4. A key-operated switch or other manual device is provided adjacent to each door equipped with the locking device. Such switch or other device, when operated, shall result in direct interruption of power to the lock -- independent of the control system electronics.

5. All staff shall have keys or other means to unlock the switch or other device or each door provided with the locking device.

[B. C.] Add Section 407.9 [407.10 407.11] to the IBC to read:

407.9 [407.10 407.11] Emergency power systems. Emergency power shall be provided for medical life support equipment, operating, recovery, intensive care, emergency rooms, fire detection and alarm systems in any Group I-2 occupancy licensed by the Virginia Department of Health as a hospital, nursing home or hospice facility.

C. Change Section 408.2 of the IBC to read:

~~408.2 Other occupancies. Buildings or portions of buildings in Group I-3 occupancies where security operations necessitate the locking of required means of egress shall be permitted to be classified as a different occupancy. Occupancies classified as other than Group I-3 shall meet the applicable requirements of this code for that occupancy provided provisions are made for the release of occupants at all times. Where the provisions of this code for occupancies other than Group I-3 are more restrictive than the provisions for Group I-3 occupancies, the Group I-3 occupancy provisions shall be permitted to be used.~~

~~Means of egress from detention and correctional occupancies that traverse other use areas shall, as a minimum, conform to requirements for detention and correctional occupancies.~~

~~Exception: It is permissible to exit through a horizontal exit into other contiguous occupancies that do not conform to detention and correctional occupancy egress provisions but that do comply with requirements set forth in the appropriate occupancy, as long as the occupancy is not a high hazard use.~~

~~D. Add a new Section 408.3.4 to the IBC to read as follows and renumber existing Sections 408.3.4, 408.3.5 and 408.3.6 to become Sections 408.3.5, 408.3.6 and 408.3.7 respectively:~~

~~408.3.4 Ships ladders. Ships ladders in accordance with Section 1009.12 shall be permitted from facility observation or control rooms.~~

~~E. Change Section 408.3.6 of the IBC to read:~~

~~408.3.6 Sallyports. A sallyport shall be permitted in a means of egress where there are provisions for continuous and unobstructed passage through the sallyport during an emergency egress condition. A sallyport is a security vestibule with two or more doors where the intended purpose is to prevent continuous and unobstructed passage by allowing the release of only one door at a time.~~

~~F. Add Section 408.3.8 to the IBC to read:~~

Virginia Chapter International Association of Electrical Inspectors

"Let the Code Decide"

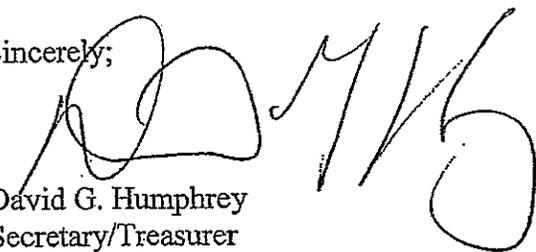
September 28, 2010

Mr. Steve Calhoun
600 East Main Street
Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun,

Pursuant Section 2.2-4007.06 Code of Virginia, the Virginia Chapter of the International Association of Electrical Inspectors and citizens of the Commonwealth as represented by the attached signatures respectfully submit this request to open public comment on section *13VAC5-63-210 M 69*. *"Deletes a new requirement in the 2009 IRC for most circuits in a house to have arc-fault protection to maintain the requirements of the 2006 IRC for just bedroom circuits to have arc-fault protection"*

Sincerely;


David G. Humphrey
Secretary/Treasurer
Virginia Chapter IAIE

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: C-310.6(E3902.11)

Proponent Information

(Check one): Individual Government Entity Company

Name: Mike Toalson

Representing: HBAV

Mailing Address: _____

Email Address: _____

Telephone Number: _____

Proposal Information

Code(s) and Section(s): 2009 USBC VCC IRC E3902.11 and 2008 NEC 210.12(B0)

Proposed Change (including all relevant section numbers, if multiple sections):

Amend to read: All branch circuits that supply 120 volt, single-phase, 15- and 20-ampere outlets installed in bedrooms shall be protected by a combination type arc-fault interrupter installed to provide protection of the branch circuit.

Supporting Statement (including intent, need, and impact of the proposal):

The 2009 IRC and the 2008 NEC have expanded the use of arc-fault devices to all habitable rooms of a dwelling unit. We prefer to leave them required for bedrooms as currently is done in the 2006 USBC and the 2005 NEC. We do dispute the estimated cost of these additional devices in other habitable rooms of only a few hundred dollars and believe it is closer to twice that estimate when you have to include the cost of the devices, installation and overhead. Arc-fault devices were just required in bedrooms in the 2006 USBC/2005 NEC and it might be prudent to see if there are technical issues with their effectiveness as they are now just being widely used and prior to their mandate to be being required, there were issues where the devices were making false reads from the operation of some appliances.

Submittal Information

Date Submitted: 1-25-10

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center

Email Address: tsu@dhcd.virginia.gov

sheath shall extend through the conduit or tubing and into the outlet or device box not less than 1/4 inch (6.4 mm). The cable shall be secured within 12 inches (305 mm) of the point where the cable enters the conduit or tubing. Metal conduit, tubing, and metal outlet boxes shall be connected to an equipment grounding conductor.

69. Change Section E3902.11 to read:

E3902.11 Arc-fault protection of bedroom outlets. All branch circuits that supply 120-volt, single phase, 15-ampere and 20-ampere outlets installed in bedrooms shall be protected by a combination type arc-fault circuit interrupter installed to provide protection of the branch circuit.

Exceptions:

1. Where a combination AFCI is installed at the first outlet to provide protection for the remaining portion of the branch circuit, the portion of the branch circuit between the branch-circuit overcurrent device and such outlet shall be wired with metal outlet and junction boxes and RMC, IMC, EMT or steel armored cable, Type AC meeting the requirements of Section E3908.8.

2. AFCI protection is not required for a branch circuit supplying only a fire alarm system where the branch circuit is wired with metal outlet and junction boxes and RMC, IMC, EMT or steel armored cable Type AC meeting the requirements of Section E3908.8.]

13VAC5-63-220. Chapter 4 Special detailed requirements based on use and occupancy.

A. [Delete Section 403.4.4 of the IBC.

B.] Add Section 407.8 [407.9 407.10] to the IBC to read:

407.8 [407.9 407.10] Special locking arrangement. Means of egress doors shall be permitted to contain locking devices restricting the means of egress in areas in which the clinical needs of the patients require restraint of movement, where all of the following conditions are met:

1. The locks release upon activation of the fire alarm system or the loss of power.
2. The building is equipped with an approved automatic sprinkler system in accordance with Section 903.3.1.1.
3. A manual release device is provided at a nursing station responsible for the area.
4. A key-operated switch or other manual device is provided adjacent to each door equipped with the locking device. Such switch or other device, when operated, shall result in direct interruption of power to the lock -- independent of the control system electronics.

5. All staff shall have keys or other means to unlock the switch or other device or each door provided with the locking device.

[~~B. C.~~] Add Section 407.9 [407.10 407.11] to the IBC to read:

407.9 [407.10 407.11] Emergency power systems. Emergency power shall be provided for medical life support equipment, operating, recovery, intensive care, emergency rooms, fire detection and alarm systems in any Group I-2 occupancy licensed by the Virginia Department of Health as a hospital, nursing home or hospice facility.

C. Change Section 408.2 of the IBC to read:

~~408.2 Other occupancies. Buildings or portions of buildings in Group I-3 occupancies where security operations necessitate the locking of required means of egress shall be permitted to be classified as a different occupancy. Occupancies classified as other than Group I-3 shall meet the applicable requirements of this code for that occupancy provided provisions are made for the release of occupants at all times. Where the provisions of this code for occupancies other than Group I-3 are more restrictive than the provisions for Group I-3 occupancies, the Group I-3 occupancy provisions shall be permitted to be used.~~

~~Means of egress from detention and correctional occupancies that traverse other use areas shall, as a minimum, conform to requirements for detention and correctional occupancies.~~

~~Exception: It is permissible to exit through a horizontal exit into other contiguous occupancies that do not conform to detention and correctional occupancy egress provisions but that do comply with requirements set forth in the appropriate occupancy, as long as the occupancy is not a high-hazard use.~~

~~D. Add a new Section 408.3.4 to the IBC to read as follows and renumber existing Sections 408.3.4, 408.3.5 and 408.3.6 to become Sections 408.3.5, 408.3.6 and 408.3.7 respectively:~~

~~408.3.4 Ships ladders. Ships ladders in accordance with Section 1009.12 shall be permitted from facility observation or control rooms.~~

~~E. Change Section 408.3.6 of the IBC to read:~~

~~408.3.6 Sallyports. A sallyport shall be permitted in a means of egress where there are provisions for continuous and unobstructed passage through the sallyport during an emergency egress condition. A sallyport is a security vestibule with two or more doors where the intended purpose is to prevent continuous and unobstructed passage by allowing the release of only one door at a time.~~

~~F. Add Section 408.3.8 to the IBC to read:~~

October 21, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals represented on the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Uniform Statewide Building Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-63-240 Section "E" dealing with USBC section 903.2.3.

This code section was not properly vetted through the work group process and there was no opportunity for public comment. The change made by the Codes and Standards Committee did not receive full benefit of discussion and the change has considerable impact on the safety of persons who occupy these types of structures. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

Charles E. Altizer, P.E.
State Fire Marshal

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: C-903.2

Proponent Information

(Check one): Individual Government Entity Company

Name: Dan Zacharias

Representing: Old Dominion Association of Church Schools

Mailing Address: 3131 Valor Court, Broadway, VA 22815

Email Address: vaodacs@verizon.net

Telephone Number: 540-896-2785

Proposal Information

Code(s) and Section(s): IBC Section 903.2

Proposed Change (including all relevant section numbers, if multiple sections):

Retain 20,000 square foot threshold for requiring automatic sprinkler systems in educational structures (Group E).

Supporting Statement (including intent, need, and impact of the proposal):

The cost of dropping the threshold to 12,000 square feet would be extremely high compared to the minute risk involved with retaining it at the current 20,000 square feet. A number of private schools would bear an inordinate financial burden when they build. These schools are already complying with the multitude of fire safety regulations designed to protect the students and teachers, and their safety record over the years has been outstanding.

Submittal Information

Date Submitted: July 13, 2009

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: tsu@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



Regulations

5. Smoke dampers are not required where the building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.

13VAC5-63-240. Chapter 9 Fire protection systems.

A. Add the following definitions to Section 902 of the IBC to read:

Emergency communication equipment. Emergency communication equipment, includes, but is not limited to, two-way radio communications, signal booster, bi-directional amplifiers, radiating cable systems or internal multiple antenna, or a combination of the foregoing.

Emergency public safety personnel. Emergency public safety personnel includes firefighters, emergency medical personnel, law-enforcement officers and other emergency public safety personnel routinely called upon to provide emergency assistance to members of the public in a wide variety of emergency situations, including, but not limited to, fires, medical emergencies, violent crimes and terrorist attacks.

B. Change the following definition in Section 902 of the IBC to read:

Automatic fire-extinguishing system. An approved system of devices and equipment which automatically detects a fire and discharges an approved fire-extinguishing agent onto or in the area of a fire and shall include among other systems an automatic sprinkler system, unless otherwise expressly stated.

C. Change Section 903.2.1.2 of the IBC to read:

903.2.1.2 Group A-2. An automatic sprinkler system shall be provided for Group A-2 occupancies where one of the following conditions exists:

1. The fire area exceeds 5,000 square feet (~~465 m²~~) (464.5m²);
2. The fire area has an occupant load of 100 or more in night clubs or 300 or more in other Group A-2 occupancies; or
3. The fire area is located on a floor other than ~~the~~ a level of exit discharge servicing such occupancies.

D. Change Item 2 of Section 903.2.1.3 of the IBC to read:

2. In Group A-3 occupancies other than churches, the fire area has an occupant load of 300 or more; or

E. [Change Section 903.2.3 of the IBC to read:

903.2.3 Group E. An automatic sprinkler system shall be provided for Group E occupancies as follows:

1. Throughout all Group E fire areas greater than 20,000 square feet (1858 m²) in area.

2. Throughout every portion of educational buildings below the lowest level of exit discharge serving that portion of the building.

Exception: An automatic sprinkler system is not required in any area below the lowest level of exit discharge serving that area where every classroom throughout the building has at least one exterior exit door at ground level.

F. Change Section 903.2.7 of the IBC to read:

903.2.7 Group M. An automatic sprinkler system shall be provided throughout buildings containing a Group M occupancy where one of the following conditions exists:

1. A Group M fire area exceeds 12,000 square feet (1115 m²).
2. A Group M fire area is located more than three stories above grade plane.
3. The combined area of all Group M fire areas on all floors, including any mezzanines, exceeds 24,000 square feet (2230 m²).

G.] Change Section ~~903.2.7~~ 903.2.8 of the IBC to read:

903.2.7 Group R. An automatic sprinkler system installed in accordance with Section 903.3 shall be provided throughout all buildings with a Group R fire area, except in the following Group R-2 occupancies when the necessary water pressure or volume, or both, for the system is not available:

Exceptions:

1. Buildings which do not exceed two stories, including basements which are not considered as a story above grade, and with a maximum of 16 dwelling units per fire area. Each dwelling unit shall have at least one door opening to an exterior exit access that leads directly to the exits required to serve that dwelling unit.
2. Buildings where all dwelling units are not more than two stories above the lowest level of exit discharge and not more than one story below the highest level of exit discharge of exits serving the dwelling unit and a two-hour fire barrier is provided between each pair of dwelling units. Each bedroom of a dormitory or boarding house shall be considered a dwelling unit under this exception.

[~~E. H.~~] Add Item 6 to Section 903.3.1.1.1 of the IBC to read:

6. Elevator machine rooms and elevator machine spaces for occupant evacuation elevators.

F. [~~G. I.~~] Add Section 903.3.1.2.2 to the IBC to read:

903.3.1.2.2 Attics. Sprinkler protection shall be provided for attics in buildings of Type III, IV or V construction in Group R-2 occupancies that are designed or developed and marketed to senior citizens 55 years of age or older and in



APARTMENT AND OFFICE BUILDING
ASSOCIATION OF
METROPOLITAN WASHINGTON

October 27, 2010

Mr. Brian Mullins, Chairman
Virginia Board of Housing and Community Development
c/o Virginia Department of Housing and Community Development
600 East Main Street, Suite 300
Richmond, Virginia 23219

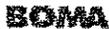
Subject: 2009 USBC International Building Code, Section 906.1, Exception 1

Dear Mr. Mullins and Members of the Board:

As you may know, AOBA's commercial office building members own or manage almost seventy million square feet of office space in Northern Virginia, and they continue to develop the space needed to accommodate the region's many businesses, small and large. On behalf of those members, I write to petition the Board to **restore** a provision which has been contained in the Commonwealth's USBC for many years, because it is a proven incentive for owners to install quick response sprinkler systems in buildings. Absent action by the Board, this provision will be deleted in the next codes adoption.

AOBA believes there is no Virginia fire incidence data to support this action, and that the consequence will be unnecessary additional costs to construct, and thereafter to maintain, the buildings affected— costs which will ultimately be borne by the many businesses throughout Virginia that will occupy the spaces in question, but with no evidence to show they will experience an increase in safety from fire.

The code section is one which prescribes the circumstances in which installation of portable fire extinguishers is required. Historically, there has been an exception for buildings in which the owner agrees to install quick response sprinkler systems. This provision has worked well, serving as an effective incentive for owners to utilize-- sooner than they might have otherwise-- the technology offered by quick response sprinklers to more quickly control and put out incipient or larger fires.



1150 17th Street, NW, Washington, DC 20036
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The necessity for this petition came about because the exception in question was deleted in the 2009 Edition of the ICC's International Building Code. The Fire Equipment Manufacturers Association (the industry association), with assistance from fire organizations at various levels, were successful in pushing through this code change in the name of "redundancy." They took this route, in no small part, because previously they had been successful in persuading only thirteen states to affirmatively delete the sprinkler exception from their fire codes, and require portable extinguishers even in fully sprinklered buildings.

In Virginia, it is the USBC Virginia Construction Code that governs fire safety systems and which, for decades has promoted sprinklers by providing an exception to the portable extinguisher requirement in A, B, E and R occupancies if they are sprinklered. To AOBA's knowledge, this has produced outstanding fire records with few fire deaths, injuries and low amount of property damages. In fact, there have been no deaths here in Virginia for some of these sprinklered occupancies for years. National Fire Protection Association (NFPA) fire data shows similarly exemplary fire records with sprinklers. Yet, there has been enormous pressure brought, through dozens of proposed and approved code changes in the ICC 2009 and 2012 code development cycles, to assert that sprinklers are not enough, and that "redundancy" must be created; in this instance, by requiring portable extinguishers even in sprinklered buildings.

As you and the Board may recall, its Codes and Standards Committee did take this matter up in its deliberations earlier this year, and determined to retain the exemption for R-2 occupancies-- recognizing, to its credit, that someone always has to pay for "redundancy" and that the resulting impact on affordability for the tenants of rental housing, already protected by sprinklers, was not warranted. The same reality holds true for the other occupancies; however, it appeared that there may have been some confusion during the Codes and Standards Committee's discussions and vote for deletion of the exception for these other occupancies.

There is not a problem regarding these sprinklered occupancies in Virginia that was substantiated by the proponents of the deletion. How many incipient fires in sprinklered buildings have grown into major fires because a fire extinguisher wasn't used? Where is the fire data showing large amounts of property damage, injuries or deaths in sprinklered buildings? How many incipient fires in sprinklered buildings can be actually documented? Who would know better than the owners and the building management?

In AOBA's view, the lack of evidence reflects our own experience: it shows that, at most, this is an extremely rare type of incident--and not one which would justify mandating the installation of more fire extinguishers and their cabinets in sprinklered buildings with quick response sprinklers. These A, B, E and R occupancies, even after sprinklering, will still have fire extinguishers located in very specific places where they are needed-- just not in the numbers that would be otherwise required if the building were not sprinklered-- for the reason that the building will have ample, proven protection from sprinklers.

As property managers, AOBA members can assure the Board that vandalism is a far more likely event than these fire extinguishers being used, in a sprinklered building, to attempt to extinguish a fire. As the Board knows, fire drill training has always stressed, fundamentally, that occupants should first alert other occupants and then move quickly into the exit system or to other refuge floors--not to first locate a portable extinguisher and attempt to put down the fire. Portable extinguishers in a fully sprinklered building are a significant, but unnecessary, building maintenance/operating cost issue: purchase, installation, annual maintenance and inspection costs and fees, vandalism, theft, etc.

Again, we ask the Board to consider who must pay for the "redundancy" that would now be mandated in the Commonwealth's codes, and where the justification is for doing so? Speaking for builders and owners of B occupancies, AOBA advises the Board that, in the millions of square footage of buildings in these occupancies now sprinkled, there is no justification or need to visit these unwarranted expenses on Virginia businesses. We ask that the Board retain Exception 1 in the IBC's Section 906.1 which has served the Commonwealth well.

Thank you and fellow Board members for your consideration of AOBA's views.

Sincerely,

W. Shaun Pharr, Esq.
Senior Vice President of
Government Affairs

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: C-906

Proponent Information

(Check one): Individual Government Entity Company

Name: Robby Dawson

Representing: Virginia Fire Services Board

Mailing Address: 1005 Technology Park Drive, Glen Allen, VA 23059

Email Address: dawsonr@chesterfield.gov

Telephone Number: 804-717-6838

Proposal Information

Code(s) and Section(s): USBC and SFPC Section 906

Proposed Change (including all relevant section numbers, if multiple sections):

906.1 Where required.

Portable fire extinguishers shall be installed in the following locations.

1. In new and existing Group A, B, E, F, H, I, M, R-1, R-2, R-4 and S occupancies.

~~Exception: In new and existing Group A, B and E occupancies equipped throughout with quick-response sprinklers, portable fire extinguishers shall be required only in locations specified in Items 2 through 6.~~

Supporting Statement (including intent, need, and impact of the proposal):

Fire extinguishers have historically been the first line of defense for small, controllable fires. They are intended to be used for fires of limited size and easily controlled. If a fire is discovered in its early stages the most effective means of protecting life and preventing property loss is to sound an alarm and then to control and/or extinguish the incipient stage fire with a portable fire extinguisher. To simply wait for the fire to grow to size large enough for a sprinkler head to activate is contrary to lessons and guidance from the fire service and fire protection professionals. Since fire extinguishers provide a first line of defense vs. sprinklers, it remains unclear as to the justification for this exception. In that light, the Exception 1 to Section 906.1 should be deleted.

This exception was not in the original draft of the International Fire Code and it did not exist in any of the legacy fire codes. It currently does not exist in NFPA 1 Uniform Fire Code, NFPA 10 Standard for Portable Fire Extinguishers or NFPA 5000 Building Construction and Safety Code. It first appeared in the Final Draft of the 2000 editions of the IFC/IBC. Since the first publication of the International Fire Code, some Virginia fire service and fire protection professionals have expressed concern over the inclusion of an exception.

As a result a number of states have deleted the exception upon adoption of the IFC/IBC.

- 12 States plus Washington D.C. and New York City have Deleted Line 1 Exception.
- 2 States have amended Section 906.1 and the exception to require more extinguishers
- 2 States use both NFPA 1 and the IFC with more stringent code applicable.
- 17 additional States have adopted NFPA 1 as their fire code instead of the IFC.

A total of 33 State jurisdictions and an unknown number of local jurisdictions have chosen to delete the exception in favor of providing the ability to control a fire at its earliest stages.

There are other issues with this exception that have arisen since states have now been adopting the IFC and enforcing it within their state. Some examples are:

- The exception is not being interpreted correctly and as a result is not being limited to occupancies with "QUICK RESPONSE" sprinklers installed. Instead, it is being applied in all cases where "REGULAR" sprinklers are installed.
- When an occupancy is being renovated and the sprinkler system is updated, presently installed extinguishers are being removed, lessening the level of protection available.
- Fire code officials do not all see hazard areas the same and as a result Section 906.1, Item 6 is not consistently applied jurisdiction to jurisdiction.
- Some officials are exempting all extinguishers from being required thereby placing the occupants in danger at the time of a fire.

An added detriment is that if a building is occupied without fire extinguishers the ability of the building owner to properly and effectively place fire extinguishers is negatively impacted by the practical difficulty of installing fire extinguisher cabinets. Walls may not be thick enough for recessing the cabinets to keep the fire extinguishers from being obstructions to travel or from being hit and damaged themselves. If the walls and partitions can handle the recessed cabinets, design drawings and permits may be required to modify the walls and partitions.

The inclusion of R-2 occupancies is in keeping with the national model code.

This proposal will eliminate the exception and provide for the proper placement of an important incipient firefighting tool.

This proposed change, designated as F94-09/10, was accepted by the ICC Fire Code Committee at the recent Code Change hearings held in Baltimore. The Committee vote was 8 to 3 in favor of "As Submitted".

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



Group I-1 occupancies in accordance with Section 6.7.2 of NFPA 13R.

~~G. [H. J.]~~ Change Section 903.4.2 of the IBC to read:

903.4.2 Alarms. Approved audible devices shall be connected to every automatic sprinkler system. Such sprinkler water-flow alarm devices shall be activated by water flow equivalent to the flow of a single sprinkler of the smallest orifice size installed in the system. Alarm devices shall be provided on the exterior of the building in an approved location. Where a fire alarm system is installed, actuation of the automatic sprinkler system shall actuate the building fire alarm system. Group R-2 occupancies that contain 16 or more dwelling units or sleeping units, any dwelling unit or sleeping unit two or more stories above the lowest level of exit discharge, or any dwelling unit or sleeping unit more than one story below the highest level of exit discharge of exits serving the dwelling unit or sleeping unit shall provide a manual fire alarm box at an approved location to activate the suppression system alarm.

~~H. [I. K.]~~ Add an exception to Section 905.2 of the IBC to read:

Exception: The residual pressure of 100 psi for 2-1/2 inch hose connection and 65 psi for 1-1/2 inch hose connection is not required in buildings equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2 and where the highest floor level is not more than 150 feet above the lowest level of fire department vehicle access.

~~I. [J. L.]~~ Change Item 1 of Section 906.1 of the IBC to read:

~~906.1 General. Portable fire extinguishers shall be provided in occupancies and locations as required by the International Fire Code.~~

~~1. In Group A, B, E, F, H, I, M, R-1, R-4, and S occupancies.~~

~~[Exceptions Exception]:~~

~~[1.] Group R-2 occupancies [In Group A, B, and E occupancies equipped throughout with quick response sprinklers, portable fire extinguishers shall be required only in locations specified in Items 2 through 6.~~

~~2.] In Group I-3 occupancies, portable fire extinguishers shall be permitted to be located at staff locations and the access to such extinguishers shall be permitted to be locked.~~

~~J. [K. M.]~~ Change Section 907.2.1.1 of the IBC to read:

907.2.1.1 System initiation in Group A occupancies with a occupant load of 1,000 or more and in certain night clubs. Activation of the fire alarm in Group A occupancies with

an occupant load of 1,000 or more and in night clubs with an occupant load of 300 or more shall initiate a signal using an emergency voice and alarm communications system in accordance with ~~NFPA 72~~ Section 907.5.2.2.

Exception: Where approved, the prerecorded announcement is allowed to be manually deactivated for a period of time, not to exceed three minutes, for the sole purpose of allowing a live voice announcement from an approved, constantly attended location.

~~K. Change Section 907.2.9 of the IBC to read:~~

~~907.2.9 Group R-2. A manual fire alarm system shall be installed in Group R-2 occupancies.~~

~~Exceptions:~~

~~1. A fire alarm system is not required in buildings not over two stories in height where all dwelling units or sleeping rooms and contiguous attic and crawl spaces are separated from each other and public or common areas by at least one hour fire partitions and each dwelling unit or sleeping room has an exit directly to a public way, exit court or yard.~~

~~2. Manual fire alarm boxes are not required throughout the building when the following conditions are met:~~

~~2.1. The building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2; and~~

~~2.2. The notification appliances will activate upon sprinkler flow.~~

~~[L. N.]~~ Change Add an exception to Section 907.9.2 907.5.2.1.1 of the IBC to read:

~~907.9.2 Audible alarms. Audible alarm notification appliances shall be provided and shall sound a distinctive sound that is not to be used for any purpose other than that of a fire alarm. The audible alarm notification appliances shall provide a sound pressure level of 15 decibels (dBA) above the average ambient sound level or 5 dBA above the maximum sound level having a duration of at least 60 seconds, whichever is greater, in every occupied space within the building. The minimum sound pressure levels shall be: 70 dBA in occupancies in Groups R and I-1; 90 dBA in mechanical equipment rooms and 60 dBA in other occupancies. The maximum sound pressure level for audible alarm notification appliances shall be 120 dBA at the minimum hearing distance from the audible appliance. Where the average ambient noise is greater than 105 dBA, visible alarm notification appliances shall be provided in accordance with NFPA 72 and audible alarm notification appliances shall not be required.~~

~~Exceptions Exception:~~



Chesterfield County, Virginia
Fire & EMS



Fire & Life Safety Division
9800 Government Center Parkway – P.O. Box 40 – Chesterfield, VA 23832
Phone: (804) 748-1426 – Fax: (804) 768-8766 – Internet: chesterfield.gov

James R. Dawson
Fire Marshal

September 27, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals signing the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Uniform Statewide Building Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-63-240 dealing with USBC section 911.1.3.

→ 13VAC5-63-
240 Q

This code sections was not properly vetted through the work group process and there was no opportunity for public comment. The change made by the Codes and Standards Committee has a considerable impact on the fire service's ability to operate in these types of structures. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

James R. Dawson, Jr.
Fire Marshal
CHESTERFIELD FIRE AND EMS

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: Substitute for C-403.3.5

Proponent Information

(Check one): Individual Government Entity Company

Name: W. Shaun Pharr

Representing: The Apartment & Office Building Association of Metropolitan Washington and the Virginia Apartment and Management Association

Mailing Address: 1050 17th Street, NW, Suite 300, Washington, DC 20036

Email Address: spharr@aoba-metro.org

Telephone Number: (202) 296-3390

Proposal Information

Code(s) and Section(s): IBC/IFC 403.3.5, 911.1.3

Proposed Change (including all relevant section numbers, if multiple sections): Change section to read as follows:

The fire command center shall be a minimum of 96 feet (29.26 meters) in area with a minimum dimension of 8 feet (2.44 meters).

Exception:

1. Where it is determined by the building official, after consultation with the fire code official, that specific building characteristics require a larger fire command center, the building official may increase the minimum required size of the fire command center, up to 200 square feet (19 m²) in an area with a minimum dimension of up to 10 feet (3048m).

Supporting Statement (including intent, need, and impact of the proposal): No evidence has been presented to show that the size of fire command rooms in Virginia buildings built under current and previous codes has been so inadequate as to now be more than doubled from what the USBC has previously required. Rather the experience cited by property owners and managers is that the existing standard of 96 feet is more than adequate to house the necessary equipment and still allow for several people to enter during an emergency situation. In addition, these rooms are rarely used in emergency situations beyond a brief check of the elevator display panels.

For various reasons, the use of fire command centers has arguably diminished in recent years, particularly post-9/11 (e.g. use of portable radios/phones rather than in-building telephone system, active smoke/control management systems not required; continued miniaturization of panel circuitry etc. reducing equipment space needs.)

Fire data for B and R high-rise buildings for the past 6 years (covering approximately 95% of the high-rises built) show no deaths, few injuries to anyone and relatively minor financial damages, mostly water damage as a result of sprinkler head activation. Fire command centers' location in street-front space on exterior of buildings means they occupy space that is often the most expensive leased space on a per square foot basis in the building. Absent compelling evidence that fire command centers in Virginia buildings must be made significantly larger, current VSBC size requirements should be maintained.

Submittal Information

Date Submitted: January 25, 2010, amended June 4, 2010

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
Main Street Centre
600 E. Main St., Ste. 300
Richmond, VA 23219

Email Address: tsu@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: C-403.3.5

Proponent Information

(Check one): Individual Government Entity Company

Name: W. Shaun Pharr

Representing: The Apartment and Office Building Assn. of Metropolitan Washington DC and the Virginia Apartment Management Association

Mailing Address: 1050 17th Street NW Suite 300 Washington, DC 20036

Email Address: spharr@aoba-metro.org

Telephone Number: (202) 296-3390

Proposal Information

Code(s) and Section(s): IBC/IFC 403.3.5, 911.1.3

Proposed Change (including all relevant section numbers, if multiple sections):
Change 200 square feet to 96 square feet and 10 feet to 8 feet

Supporting Statement (including intent, need, and impact of the proposal):

No evidence has been presented to show that the size of fire command rooms in Virginia buildings built under current and previous codes has been so inadequate as to now be more than doubled from what the USBC has previously required. For various reasons, the use of fire command centers has arguably diminished in recent years (e.g. use of portable radios/phones rather than in-building telephone system, active smoke control/management systems not required; continued miniaturization of panel circuitry etc. reducing equipment space needs). Fire command centers' location in street-front space on exterior of buildings means they occupy space that is often the most expensive leased space on a per square foot basis in the building. Absent compelling evidence that fire command centers in Virginia buildings must be made significantly larger, current VSBC size requirements should be maintained.

Submittal Information

Date Submitted: January 25, 2010

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

Regulations

~~1. Visible alarm notification appliances shall be allowed in lieu of audible alarm notification appliances in critical-care areas of Group I-2 occupancies.~~

2. Sound pressure levels in Group I-3 occupancies shall be permitted to be limited to only the notification of occupants in the affected smoke compartment.

[O. Add Sections 908.7, 908.7.1 and 908.7.2 to the IBC to read:

908.7 Carbon monoxide alarms. Carbon monoxide alarms shall be provided in new buildings and structures in accordance with this section.

908.7.1 Alarm requirements. Carbon monoxide alarms shall be single station, hard wired, plug-in or battery type, listed as complying with UL 2034, and shall be installed in accordance with this code and the manufacturer's installation instructions.

908.7.2 Where required. Carbon monoxide alarms shall be installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in dwelling units and outside of, but in the immediate vicinity of, each sleeping unit in all Group R occupancies located within buildings containing fuel-fired appliances or where a dwelling unit or sleeping unit in a Group R occupancy is attached to a Group U private garage.

M. P.] Change Section 909.6 of the IBC to read:

909.6 Pressurization method. When approved by the building official, the means of controlling smoke shall be permitted by pressure differences across smoke barriers. Maintenance of a tenable environment is not required in the smoke-control zone of fire origin.

[Q. Change Section 911.1.3 of the IBC to read:

911.1.3 Size. The fire command center shall be a minimum of 96 square feet (9 m²) in area with a minimum dimension of eight feet (2438 mm).

Exception: Where it is determined by the building official, after consultation with the fire chief, that specific building characteristics require a larger fire command center, the building official may increase the minimum required size of the fire command center up to 200 square feet (19 m²) in area with a minimum dimension of up to 10 feet (3048 mm).

N. R.] Add Change the title of IBC Section 913 915 to read:

In-Building Emergency Communications Coverage.

[O. S.] Add Change Section 913.1 to 915.1 of the IBC to read:

913.1 915.1 General. [In-building For localities utilizing public safety wireless communications, dedicated infrastructure to accommodate and perpetuate continuous

in-building] emergency communication equipment to allow emergency public safety personnel to send and receive emergency communications shall be provided in new buildings and structures in accordance with this section.

Exceptions:

1. Buildings of Use Groups A-5, I-4, within dwelling units of R-2, R-3, R-4, R-5, and U.

2. Buildings of Type IV and V construction without basements [, that are not considered unlimited area buildings in accordance with Section 507].

3. Above grade single story buildings of less than 20,000 square feet.

4. Buildings or leased spaces occupied by federal, state, or local governments, or the contractors thereof, with security requirements where the building official has approved an alternative method to provide emergency communication equipment for emergency public safety personnel.

5. Where the owner provides technological documentation from a qualified individual that the structure or portion thereof does not impede emergency communication signals.

[P. T.] Add Sections 913.2, 913.2.1, 913.2.2 and 913.2.3 [915.2, 915.2.1, 915.2.2, 915.1.1, 915.1.2] and [915.2.3 915.1.3] to the IBC to read:

913.2 [915.2 Where required. For localities utilizing public safety wireless communications, new buildings and structures shall be equipped throughout with dedicated infrastructure to accommodate and perpetuate continuous emergency communication.]

913.2.1 [915.2.1 915.1.1] Installation. [Radiating The building owner shall install radiating] cable [systems], such as coaxial cable or equivalent [, The radiating cable] shall be installed in dedicated conduits, raceways, plenums, attics, or roofs, compatible for these specific installations as well as other applicable provisions of this code. [The locality shall be responsible for the installation of any additional communication equipment required for the operation of the system.]

913.2.2 [915.2.2 915.1.2] Operations. The locality will assume all responsibilities for the [installation operation] and maintenance of [additional the] emergency communication equipment. [To allow the locality access to and the ability to operate such equipment, The building owner shall provide] sufficient [operational] space within the building [shall be provided to allow the locality access to and the ability to operate in-building emergency communication equipment].

October 21, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals represented on the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Uniform Statewide Building Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-63-245 Section "B" dealing with USBC section 1005.1.

This code section was not properly vetted through the work group process and there was no opportunity for public comment. The change made by the Codes and Standards Committee did not receive full benefit of discussion and the change has considerable impact on the safety of persons who occupy these types of structures. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

Charles E. Altizer, P.E.
State Fire Marshal

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: C-1005.1(a)

Proponent Information

(Check one): Individual Government Entity Company

Name: J. Kenneth Payne, Jr., AIA

Representing: VSAIA

Mailing Address: 3200 Norfolk Street, Richmond, Virginia 23230

Email Address: kpayne@moseleyarchitects.com

Telephone Number: 804-794-7555

Proposal Information

Code(s) and Section(s): 2009 IBC Section 1005.1 – Minimum required egress width

Proposed Change (including all relevant section numbers, if multiple sections):

1005.1 Minimum required egress width. The *means of egress* width shall not be less than required by this section. The total width of *means of egress* in inches (mm) shall not be less than the total *occupant load* served by the *means of egress* multiplied by 0.3 inches (7.62 mm) per occupant for stairways and by 0.2 inches (5.08 mm) per occupant for other egress components. The width shall not be less than specified elsewhere in this code. Multiple *means of egress* shall be sized such that the loss of any one *means of egress* shall not reduce the available capacity to less than 50 percent of the required capacity. The maximum capacity required from any *story* of a building shall be maintained to the termination of the *means of egress*.

Exceptions:

1. *Means of egress* complying with Section 1028.
2. For occupancies other than H-1, H-2, H-3, H-4, and I-2 in buildings equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2, the total width of means of egress in inches (mm) shall not be less than the total occupant load served by the means of egress multiplied by 0.2 inches (5.08 mm) per occupant for stairways and by 0.15 inches (3.81 mm) per occupant for other egress components.

Supporting Statement (including intent, need, and impact of the proposal):

The proposed change retains the sprinkler incentive that Virginia has implemented from the 1980's (which is rapidly disappearing in the model building codes, even without empirical data supporting the 2009 change from 2006). To my knowledge, the empirical data does not justify deleting the incentive. Sprinklered buildings in Virginia also have an exceptional life safety record in sprinkled buildings.

The change is formatted to avoid adding back the "table" that then would need to be referenced throughout the rest of the code. By dealing with the change as an exception, all of the other references to this code section would not need to be revised.

The deletion of the sprinkler incentive will potentially increase the cost of all new buildings, by requiring wider corridors, wider doors and/or more doors, and wider stairs and/or more stairs. Refer to the examples below:

Doors: Assume a nominal 3'-0" wide door provides 33" of *clear* width. Under the 2006 (and earlier) code, this door in a sprinkled building would accommodate 220 occupants (33 divided by 0.15). Under the 2009 code, this same door *in a sprinkled building* would accommodate only 165 occupants (33 divided by 0.20). This represents a 25% reduction in occupant load capacity for no other reason than to eliminate sprinkler trade-offs. This will require more doors or wider doors (however, 4'-0" wide doors are the widest that are tested) to accommodate the same number of occupants.

Stairs: Assume a 4'-0" clear width stair provides 48" of *clear* width. Under the 2006 (and earlier) code, this stair in a sprinkled building would accommodate 240 occupants (48 divided by 0.20). Under the 2009 code, this same stair *in a sprinkled building* would accommodate only 160 occupants (48 divided by 0.30). This represents a 33% reduction in occupant load capacity for no other reason than to eliminate sprinkler trade-offs. This will require more stairs or wider stairs to accommodate the same number of occupants.

Corridors: Assume a 5'-0" clear width corridor provides 60" of *clear* width. Under the 2006 (and earlier) code, this corridor in a sprinkled building would accommodate 400 occupants (60 divided by 0.15). Under the 2009 code, this same corridor *in a sprinkled building* would accommodate only 300 occupants (60 divided by 0.20). This represents a 25% reduction in occupant load capacity for no other reason than to eliminate sprinkler trade-offs. This will require wider corridors to accommodate the same number of occupants.

All of the above examples (and this would apply to all means of egress elements) would add costs to all projects, reduce rentable space (wider corridors, wider stairs, more stairs), and thus reduce revenue for the Commonwealth of Virginia.

If we continue to allow the model codes to strip the sprinkler incentives, we may end up with unanticipated consequences of limited buildings with sprinkler systems, as owners might choose to forego the costs of sprinkler systems to offset the additional construction costs of all of the increased egress requirements and reduced rental income.

Submittal Information

Date Submitted: January 19, 2010

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



~~913.2.3~~ [~~915.2.3~~ 915.1.3] Inspection. In accordance with Section 113.3, all installations shall be inspected prior to concealment.

[~~Q. U.~~] Add Section ~~913.3~~ [~~915.3~~ 915.2] to the IBC to read:

~~913.3~~ [~~915.3~~ 915.2] Acceptance test. Upon completion of installation, after providing reasonable notice to the owner or their representative, emergency public safety personnel shall have the right during normal business hours, or other mutually agreed upon time, to enter onto the property to conduct field tests to verify that the required level of radio coverage is present at no cost to the owner. Any noted deficiencies [in the installation of the radiating cable or operational space] shall be provided in an inspection report to the owner or the owner's representative.

13VAC5-63-245. Chapter 10 Means of egress.

A. Change Section 1004.3 of the IBC to read:

1004.3 Posting of occupant load. Every room or space that is an assembly occupancy and where the occupant load of that room or space is 50 or more shall have the occupant load of the room or space posted in a conspicuous place, near the main exit or exit access doorway from the room or space. Posted signs shall be of an approved legible permanent design and shall be maintained by the owner or authorized agent.

B. Change Exception 3 of Section 1007.3 of the IBC to read:

~~3. The clear width of 48 inches (1219 mm) between handrails and the area of refuge is not required at exit stairways in buildings or facilities equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2.~~

C. Change Section 1007.4 of the IBC to read:

~~1007.4 Elevators. In order to be considered part of an accessible means of egress, an elevator shall comply with the emergency operation and signaling device requirements of Section 2.27 of ASME A17.1. Standby power shall be provided in accordance with Sections 2702 and 3003. The elevator shall be accessed from either an area of refuge complying with Section 1007.6 or a horizontal exit.~~

Exceptions:

- ~~1. Elevators are not required to be accessed from an area of refuge or horizontal exit in open parking garages.~~
- ~~2. Elevators are not required to be accessed from an area of refuge or horizontal exit in buildings and facilities equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2.~~

~~D. B.~~ [Change Section 1005.1 of the IBC to read:

1005.1 Minimum required egress width. The means of egress width shall not be less than required by this section. The total width of means of egress in inches (mm) shall not be less than the total occupant load served by the means of egress multiplied by 0.3 inches (7.62 mm) per occupant for stairways and by 0.2 inches (5.08 mm) per occupant for other egress components. The width shall not be less than specified elsewhere in this code. Multiple means of egress shall be sized such that the loss of any one means of egress shall not reduce the available capacity to less than 50% of the required capacity. The maximum capacity required from any story of a building shall be maintained to the termination of the means of egress.

Exceptions:

1. Means of egress complying with Section 1028.
2. For occupancies other than Groups H-1, H-2, H-3, H-4 and I-2, in buildings equipped with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2, the total width of means of egress in inches (mm) shall not be less than the total occupant load served by the means of egress multiplied by 0.2 inches (5.08 mm) per occupant for stairways and by 0.15 inches (3.81 mm) per occupant for other egress components.

C. Change Section 1007.2 of the IBC to read:

1007.2 Continuity and components. Each required accessible means of egress shall be continuous to a public way and shall consist of one or more of the following components:

1. Accessible routes complying with Section 1104.
2. Interior exit stairways complying with Sections 1007.3 and 1022.
3. Exterior exit stairways complying with Sections 1007.3 and 1026 and serving levels other than the level of exit discharge.
4. Elevators complying with Section 1007.4.
5. Platform lifts complying with Section 1007.5.
6. Horizontal exits complying with Section 1025.
7. Ramps complying with Section 1010.
8. Areas of refuge complying with Section 1007.6.
9. Exterior area for assisted rescue complying with Section 1007.7 serving exits at the level of exit discharge.

~~D.]~~ Change Section 1007.6.2 of the IBC to read:

1007.6.2 Separation. Each area of refuge shall be separated from the remainder of the story by a smoke barrier complying with Section 709 or a horizontal exit complying

From: Leaper4me@aol.com [mailto:Leaper4me@aol.com]

Sent: Tuesday, October 26, 2010 11:38 AM

To: Calhoun, Steve (DHCD)

Subject: Proposed Fire Regulations

I am writing to express my concern over the proposed changes that will require Child Care Facilities such as ours to pay \$400 per year for fire inspections . This is ridiculous. I am required to give the Fire Marshall access to my property -fine. But now apparently I am supposed to pay \$400 for an inspection I did not request.

This needs to be removed from these regulations.

Robert Franklin
Graves Mill Early Learning Center
Forest, VA 24551
434-385-5200

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: _____ F-107.14 Substitute_V2 _____

Proponent Information

(Check one): Individual Government Entity Company

Name: Ed Altizer

Representing: State Fire Marshal's Office

Mailing Address: 1005 Technology Park Drive, Glen Allen, VA 23059

Email Address: ed.altizer@vdfp.virginia.gov

Telephone Number: 804-371-7170

Proposal Information

Code(s) and Section(s): SFPC Section 107.14

Proposed Change (including all relevant section numbers, if multiple sections):

Add #'s 5 and 6 to Section 107.14 to read:

107.14 State annual inspection permit fees. Annual fees for inspection permits issued by the State Fire Marshal's Office for the inspection of buildings shall be as follows:

5. ~~Child Day-Care Centers, SRCP, Assisted Living Facilities and Adult Day Care Centers~~ licensed by the Virginia Department of Social Services based on licensed capacity= as follows:

- 5.1. \$50 for 1 to 8 ~~licensed occupants.~~
- 5.2. \$75 for 9 to 20 ~~licensed occupants.~~
- 5.3. \$100 for ~~21 to 50 licensed occupants.~~
- 5.4. \$200 for 51 to 100 ~~licensed occupants.~~
- 5.5. \$400 for 101 or more ~~licensed occupants.~~

Supporting Statement (including intent, need, and impact of the proposal):

Given its current staffing and fiscal resources, statutory responsibility and direction, the SFMO is no longer able to sustain the present inspection program without supplemental or augmented revenue support.

Workload assignments, SFMO regional boundaries, travel time, administrative time, re-prioritization of what is inspected, inspection frequencies are among some of the aspects the SFMO has examined towards maximizing efficiency given what little resource and staffing remains; all with an eye towards avoiding the implementation of additional permits and fee schedule and still meet its responsibility and direction. Through its most recent review none of the above items, singularly or in combination, have yielded sufficient means or opportunity to avoid the introduction of this code change for additional permits and permit fees and still continue its current service level. Even with the implementation of these permits and fees, the SFMO is not going to be able to increase its current service level or the number of inspections being performed. This change is to help ensure the maintenance of current levels and numbers.

C:\Documents and Settings\glenn.dean\My Documents\SFMO Files\2009 State Code Changes\Code Changes Submitted to BHCD\107_14 Permit fees by SFMO for Day Care Ctr and ALF V2.doc

The authority to institute such permits and fees is found in § 27-98 of the Code of Virginia allowing the SFMO to "...charge a fee to recover the actual cost of administering and enforcing of the Code in jurisdictions for which he serves as the enforcing authority."

As an aside, through a coordinated effort based on statutory directives, these inspections are required by other state agencies such as the Virginia Department of Mental Health and Behavioral Services, formerly known as the Department of Mental Health, Mental Retardation and Substance Abuse Services, and the Virginia Department of Social Services.

While all inspections performed by the SFMO are important and of high priority, these facilities contain some of the Commonwealth's most vulnerable occupants and helps ensures the SFMO continues to be positioned to meet all its statutory responsibilities and direction for ensuring these fire safe facilities continue to exist.

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



events]. [If an application is received by the State Fire Marshal's office less than 15 days prior to the planned event, the permit fee shall be \$450 per day and \$150 per day for each consecutive day for identical multi-day events. If an application is received by the State Fire Marshal's office less than seven days prior to the planned event, the permit fee shall be \$550 per day and \$150 per day for each consecutive day for identical multi-day events.]

6. [~~\$200~~ \$250 the first] day [~~for~~ of] fireworks, pyrotechnics or proximate audience displays conducted out-of-doors on any state-owned property and \$150 per day for each [~~subsequent consecutive~~] day [for identical multi-day events]. [If an application is received by the State Fire Marshal's office less than 15 days prior to the planned event, the permit fee shall be \$450 per day and \$150 per day for each consecutive day for identical multi-day events. If an application is received by the State Fire Marshal's office less than seven days prior to the planned event, the permit fee shall be \$550 per day and \$150 per day for each consecutive day for identical multi-day events.]

7. [~~\$75~~ \$100] per event for the use of explosives in special operations or emergency conditions.

[8. \$300 the first day for flame effects conducted in accordance with Section 308.3.6 indoors of any state-owned building or outdoors on state-owned property and \$150 per day for each consecutive day for identical multi-day events, or, if conducted as part of a firework (pyrotechnic) display, \$100 the first day and \$75 per day for each consecutive day for identical multi-day events. If an application for flame effects is received by the State Fire Marshal's office less than 15 days prior to the planned event, the permit fee shall be \$450 per day and \$150 per day for each consecutive day for identical multi-day events. If an application is received by the State Fire Marshal's office less than seven days prior to the planned event, the permit fee shall be \$550 per day and \$150 per day for each consecutive day for identical multi-day events.]

P. 107.14 State annual inspection permit fees. Annual fees for inspection permits issued by the State Fire Marshal's office for the inspection of buildings shall be as follows:

1. Nightclubs.

- 1.1. \$350 for occupant load of 100 or less.
- 1.2. \$450 for occupant load of 101 to 200.
- 1.3. \$500 for occupant load of 201 to 300.
- 1.4. \$500 plus \$50 for each 100 occupants where occupant loads exceed 300.

2. Private college dormitories with or without assembly areas. If containing assembly areas, such assembly areas are not included in the computation of square footage.

- 2.1. \$150 for 3500 square feet or less.
- 2.2. \$200 for greater than 3500 square feet up to 7000 square feet.
- 2.3. \$250 for greater than 7000 square feet up to 10,000 square feet.
- 2.4. \$250 plus \$50 for each additional 3000 square feet where square footage exceeds 10,000.

3. Assembly areas that are part of private college dormitories.

- 3.1. \$50 for 10,000 square feet or less provided the assembly area is within or attached to a dormitory building.
- 3.2. \$100 for greater than 10,000 square feet up to 25,000 square feet provided the assembly area is within or attached to a dormitory building, such as gymnasiums, auditoriums or cafeterias.
- 3.3. \$100 for up to 25,000 square feet provided the assembly area is in a separate or separate buildings such as gymnasiums, auditoriums or cafeterias.
- 3.4. \$150 for greater than 25,000 square feet for assembly areas within or attached to a dormitory building or in a separate or separate buildings such as gymnasiums, auditoriums or cafeterias.

4. Hospitals.

- 4.1. \$300 for 1 to 50 beds.
- 4.2. \$400 for 51 to 100 beds.
- 4.3. \$500 for 101 to 150 beds.
- 4.4. \$600 for 151 to 200 beds.
- 4.5. \$600 plus \$100 for each additional 100 beds where the number of beds exceeds 200.

[5. Child day centers, assisted living facilities and adult day care centers licensed by the Virginia Department of Social Services based on licensed capacity as follows:

- 5.1. \$50 for 1 to 8.
- 5.2. \$75 for 9 to 20.
- 5.3. \$100 for 21 to 50.
- 5.4. \$200 for 51 to 100.
- 5.5. \$400 for 101 or more.]

Exception: Annual inspection permits for any building or groups of buildings on the same site may not exceed \$2500.



Chesterfield County, Virginia
Fire & EMS



Fire & Life Safety Division
9800 Government Center Parkway – P.O. Box 40 – Chesterfield, VA 23832
Phone: (804) 748-1426 – Fax: (804) 768-8766 – Internet: chesterfield.gov

James R. Dawson
Fire Marshal

September 27, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals signing the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Statewide Fire Prevention Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-51-~~31~~³¹E dealing with SFPC section 313.1 and 13VAC5-51-~~31~~³¹F dealing with SFPC section 315.2.

*should be
131*

These code sections were not properly vetted through the work group process and there was no opportunity for public comment. The changes made by the Codes and Standards Committee have a considerable impact to the fire prevention code, and we look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

James R. Dawson, Jr.
Fire Marshal
CHESTERFIELD FIRE AND EMS

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: F - 315.1

Proponent Information

(Check one): Individual Government Entity Company

Name: Robby Dawson

Representing: Virginia Fire Services Board

Mailing Address: 1005 Technology Park Drive, Glen Allen, VA 23059

Email Address: dawsoni@chesterfield.gov

Telephone Number: 804-717-6838

Proposal Information

Code(s) and Section(s): SFPC Section 315

Proposed Change (including all relevant section numbers, if multiple sections):

Revise Section Title and Sections as follows:

Section 315
~~Miscellaneous Combustible Materials~~ General Storage

Revise SFPC 315.1 as follows:

315.1 General. ~~Storage, use and handling of miscellaneous combustible materials~~ shall be in accordance with this section.

315.2 Permit required. ~~A permit for miscellaneous combustible storage shall be obtained in accordance with required as set forth in Table 107.2 (Miscellaneous combustible storage).~~

Renumber SFPC 315.2 and revise as follows:

315.2 315.3 Storage in buildings. Storage of ~~combustible~~ materials in buildings shall be orderly and stable. Storage of combustible materials shall be separated from heaters or heating devices by distance or shielding so that ignition cannot occur.

(Renumber following sections...)

Supporting Statement (including intent, need, and impact of the proposal):

This proposal will modify this section covering storage in buildings in several different ways.

This proposal is intended to clarify that this section contains requirements which apply to storage in general, not just storage of combustible materials. Specifically, Section 315.2.1 requires that a separation be maintained between the top of storage and ceilings or sprinklers. This requirement applies to all storage, whether combustible or not, and providing a clearance from sprinklers and ceilings is critical whether the materials are combustible or not.

The first sentence of Section 315.1 is revised to delete the reference to "use and handling". As stated in the title of the section, this section applies to "storage". Sections 315.1 and 315.2 deal with storage and there are no requirements

for use or handling.

The second sentence of Section 315.1 is separated and creates a new Section 315.2 dealing with permits. This follows standard format throughout the rest of the fire code. The new Section 315.2 is also revised to specify that a permit is required only for storage of combustible materials. Even though this section regulates storage of both combustible and noncombustible materials, only combustible materials are required to obtain a permit when the storage exceeds 2500 cubic feet. The quantity limit is specified in the permit requirements in Table 107.2 (Miscellaneous combustible storage).

Section 315.2 is renumbered to 315.3 and revised to specify that the first sentence applies to ALL storage, and the second sentence applies to combustible storage. This will then state that all storage, whether combustible or not, is regulated and should be orderly. This means that the stored materials, whether combustible or not, are orderly, and that the stacks of stored materials need to be stable. These requirements allow for aisles being maintained, and the reduction of injury or blocking of exit during a seismic event or even when materials are hit with a hose stream during fire operations.

Hazards specific to 'combustible' materials have been more clearly identified. The second sentence in 315.3 is revised to specify that only combustible materials need to be separated from ignition sources. It is not necessary to separate non-combustible materials from ignition sources because there is no hazard.

Submittal Information

Date Submitted: 12/16/2009

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



4. Small arms primers shall be displayed and stored in the manufacturer's original packaging and in accordance with the requirements of Section 3306.5.2.3.

E. Change Section 315.1 to read:

315.1. General. Storage shall be in accordance with this section.

F. Change Section 315.2 to read:

315.2. Storage in buildings. Storage of materials in buildings shall be orderly and stable. Storage of combustible materials shall be separated from heaters or heating devices by distance or shielding so that ignition cannot occur.

G. Change Section 315.3 to read:

315.3. Outside storage. Outside storage of combustible materials shall not be located within 10 feet (3048 mm) of a property line or other building on the site.

Exceptions:

1. The separation distance is allowed to be reduced to 3 feet (914 mm) for storage not exceeding 6 feet (1829 mm) in height.
2. The separation distance is allowed to be reduced when the fire official determines that no hazard to the adjoining property exists.

F. H. Change Section 315.3.1 to read:

315.3.1. Storage beneath overhead projections from buildings. To the extent required by the code the building was constructed under, when buildings are required to be protected by automatic sprinklers, the outdoor storage, display and handling of combustible materials under eaves, canopies or other projections or overhangs is prohibited except where automatic sprinklers are installed under such eaves, canopies or other projections or overhangs.]

13VAC5-51-132. IFC Chapter 4. Emergency Planning and Preparedness.

A. Add Section 401.1.1 to read:

401.1.1. State Regulated Care Facilities: when a state license is required by the Virginia Department of Social Services; Virginia Department of [~~Mental Health, Mental Retardation and Substance Abuse~~ Behavioral Health and Developmental] Services; Virginia Department of Education; or Virginia Department of Juvenile Justice to operate, SRCF shall comply with this section and the provisions of Section 404.0.

B. Add item ~~14~~ 15 to Section 404.2 to read:

~~14.~~ 15. SRCF.

C. Add exception to Section 405.1 to read:

Exception: Emergency evacuation drills shall not be conducted in school buildings during periods of mandatory testing required by the Virginia Board of Education.

D. Add the following category to Table 405.2 to read:

Group or occupancy	Frequency	Participation
SRCF	Monthly	All occupants

E. Add Section 405.2.1 to read:

405.2.1. High-rise buildings. Fire exit drills shall be conducted annually by building staff personnel or the owner of the building in accordance with the fire safety plan and shall not affect other current occupants.

F. Add Section 408.1.1 to read:

408.1.1. Maintaining occupant load posting. Occupant load postings required by the building code are required to be maintained.

G. Change Section 408.2 to read:

408.2. Group A occupancies. Group A occupancies shall comply with applicable requirements of Sections 408.2.1 through 408.2.3 and 401 through 406.

H. Add Sections 408.2.3, 408.2.3.1 and 408.2.3.2 to read:

408.2.3. Night clubs. Night clubs shall comply with Sections 408.2.3.1 and 408.2.3.2.

408.2.3.1. Audible announcements. Audible announcements shall be made to the occupants no longer than 10 minutes prior to the start of the entertainment and at each intermission to notify the occupants of the location of the exits to be used in the event of a fire or other emergency.

408.2.3.2. Occupant load count. Upon request of the fire code official, the owner or operator, or both, will be required to keep a running count of the occupant load to provide to the fire code official during performance hours of operation, entertainment hours of operation, or both.

13VAC5-51-133. IFC Chapter 5. Fire Service Features.

A. Delete Section 501.4.

B. Add exceptions to Section 503.1 to read:

Exceptions:

1. Fire apparatus access roads shall be permitted to be provided and maintained in accordance with written policy that establish fire apparatus access road requirements and such requirements shall be identified to the owner or his agent prior to the building official's approval of the building permit.



Chesterfield County, Virginia
Fire & EMS



Fire & Life Safety Division
9800 Government Center Parkway – P.O. Box 40 – Chesterfield, VA 23832
Phone: (804) 748-1426 – Fax: (804) 768-8766 – Internet: chesterfield.gov

James R. Dawson
Fire Marshal

September 27, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals signing the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Statewide Fire Prevention Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-51-133 C dealing with SFPC section 503.2.1.

This code sections was not properly vetted through the work group process and there was no opportunity for public comment. The changes made by the Codes and Standards Committee have a considerable impact to the fire prevention code and is in conflict with the concept of local adoption of the appendices of the International Fire Code. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

James R. Dawson, Jr.
Fire Marshal
CHESTERFIELD FIRE AND EMS

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: _____

Proponent Information

(Check one): Individual Government Entity Company

Name: DHCD Staff (at the direction of the Codes and Standards Committee)

Email Address: _____

Telephone Number: _____

Proposal Information

Code(s) and Section(s): SFPC Section 503.2.1

Proposed Change (including all relevant section numbers, if multiple sections):

Add new exception to Section 503.2.1 of the IFC as follows:

Exception: Fire apparatus access roads exclusively serving single family dwelling or townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code shall have an unobstructed width of not less than 18 feet (5486 mm), exclusive of shoulders.

Supporting Statement (including intent, need, and impact of the proposal):

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)

The Jackson Center

501 N. 2nd Street

Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov

Fax Number: (804) 371-7092

Phone Numbers: (804) 371-7140 or (804) 371-7150



VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: _____

Proponent Information

(Check one): Individual Government Entity Company

Name: Robby Dawson, Chairman

Representing: Virginia Residential Sprinkler Coalition

Mailing Address: 9800 Government Center Parkway, Chesterfield, VA 23832

Email Address: dawsonj@chesterfield.gov

Telephone Number: 804-717-6838

Proposal Information

Code(s) and Section(s): IFC 503.2.1

Proposed Change (including all relevant section numbers, if multiple sections):

Change the following code sections as noted: Add exception as noted

503.2.1 Dimensions. Fire apparatus access roads shall have an unobstructed width of not less than 20 feet (6096mm), exclusive of shoulders, except for approved security gates in accordance with Section 503.6, and an unobstructed vertical clearance of not less than 13 feet 6 inches (4115mm)

Exception: Fire apparatus access roads exclusively serving fully sprinklered residential developments in accordance with IRC Section 313.1 or 313.2 shall have an unobstructed width of not less than 18 feet (5486mm), exclusive of shoulders.

Supporting Statement (including intent, need, and impact of the proposal):

With the improved fire safety of residential sprinklers, the need for apparatus access to combat large scale fires is reduced. This reduction in residential street width takes advantage of the inclusion of sprinklers in new construction. This reduction is limited to single family dwellings where the all dwelling units in the development are electively sprinklered and townhouse developments only.

This approach has been used in localities in Virginia already without fire service operational issues. This is also the standard used by a number of other communities where residential sprinklers are used as a community fire protection strategy. The reduction in impervious surface in addition to the infrastructure cost savings will offset the additional costs associated with fire sprinkler systems.

While no specific cost savings have been identified, this change would result in as much as a 10% reduction in certain required fire apparatus access roads and the resulting savings in materials and impervious surfaces will have a positive impact on the infrastructure costs and environmental impacts.

Submittal Information

Date Submitted: September 7, 2009

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



Regulations

2. On construction and demolition sites fire apparatus access roads shall be permitted to be provided and maintained in accordance with Section 1410.1.

C. [Add exception to Section 503.2.1 to read:

Exception: Fire apparatus access roads exclusively serving single family dwelling or townhouse developments that are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code shall have an unobstructed width of not less than 18 feet (5486 mm), exclusive of shoulders.

D. Add Section 503.7 to read:

503.7. Fire lanes for existing buildings. The fire code official is authorized to designate public and private fire lanes as deemed necessary for the efficient and effective operation of fire apparatus. Fire lanes shall comply with Sections 503.2 through 503.6.

E. Change the title of Section 506 to read "Key Boxes and Elevator Fire Service Keys."

F. Change Section 506.1 to read:

506.1. Where required. Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life-saving or firefighting purposes, the fire code official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with UL 1037 and shall contain keys to gain necessary access as required by the fire code official.

Exception: Existing key boxes are not required to be listed in accordance with UL 1037 unless replaced.

G. Add Section 506.3, including all subsections, to read:

506.3. Standardized fire service elevator keys. All buildings with elevators equipped with Phase I emergency recall or Phase II emergency in-car operation, or buildings equipped with fire service access or occupant evacuation elevators shall be equipped to operate with a standardized fire service key approved by the fire code official.

Exception: Where providing a standardized key is not possible due to the existing nonstandard elevator equipment, the owner shall be permitted to place the building's nonstandardized fire service elevator keys in a key box installed in accordance with Section 506.1.

506.3.1. Requirements for standardized fire service keys. Standardized fire service elevator keys shall comply with all of the following:

1. All fire service elevator keys within the jurisdiction shall be uniform and specific for the jurisdiction. Keys shall be cut to a uniform key code.

2. Fire service elevator keys shall be a patent protected design to prevent unauthorized duplication.

3. Fire service elevator keys subject to these rules shall be engraved with the words "DO NOT DUPLICATE."

506.3.2. Access to standardized fire service keys. Access to standardized fire service elevator keys shall be restricted to the following persons or groups:

1. Elevator owners or their authorized agents.
2. Elevator contractors.
3. Elevator inspectors of the jurisdiction.
4. Fire and building code officials of the jurisdiction.
5. The fire department and other emergency response agencies designated by the fire code official and the code official responsible for the enforcement of Part III, Maintenance, of the USBC.

506.3.3. Duplication or distribution of keys. No person may duplicate a standardized fire service elevator key or issue, give, or sell a duplicated key unless in accordance with this code.

506.3.4. Responsibility to provide keys. The building owner shall provide up to three standardized fire service elevator keys, if required by the fire code official, upon installation of a standardized fire service key switch or switches in the building.

H. Add Sections 507.3.1 and 507.3.2 to read:

507.3.1. Fire flow requirements for fully sprinklered residential developments. Notwithstanding Section 103.1.2, the fire flow requirements in Table B105.1 of Appendix B of the IFC, as modified by Section 507.3.2, shall be permitted to be used for determining fire flow in single family dwelling and townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code.

507.3.2. Modifications to Table B105.1. The first six rows of columns five and six of Table B105.1 of Appendix B of the IFC shall be modified as shown below for the use of Table B105.1 in Section 507.3.1.

<u>Type 5-B</u>	<u>Fire-flow (gallons per minute)</u>
<u>0-5000</u>	<u>1000</u>
<u>5001-7200</u>	<u>1250</u>
<u>7201-8200</u>	<u>1500</u>
<u>8201-9500</u>	<u>1750</u>
<u>9501-11300</u>	<u>2000</u>
<u>11301-13000</u>	<u>2250</u>



Chesterfield County, Virginia
Fire & EMS



Fire & Life Safety Division

9800 Government Center Parkway – P.O. Box 40 – Chesterfield, VA 23832

Phone: (804) 748-1426 – Fax: (804) 768-8766 – Internet: chesterfield.gov

James R. Dawson
Fire Marshal

September 27, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals signing the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Statewide Fire Prevention Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-51-133 J dealing with SFPC section 507.5.1.1.

This code sections was not properly vetted through the work group process and there was no opportunity for public comment. The changes made by the Codes and Standards Committee have a considerable impact to the fire prevention code and is in conflict with the concept of local adoption of the appendices of the International Fire Code. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

James R. Dawson, Jr.

Fire Marshal

CHESTERFIELD FIRE AND EMS

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: _____

Proponent Information

(Check one): Individual Government Entity Company

Name: DHCD Staff (at the direction of the Codes and Standards Committee) _____

Email Address: _____ Telephone Number: _____

Proposal Information

Code(s) and Section(s): SFPC Section 507.5.1.1 _____

Proposed Change (including all relevant section numbers, if multiple sections):

Add new Section 507.5.1.1 to the IFC as follows:
507.5.1.1 Fire hydrant requirements for fully sprinklered residential developments. Notwithstanding Section 103.1.2, the number and distribution of fire hydrants in Table C105.1 of Appendix C of the IFC shall be permitted to be used in single family dwelling and townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code, with the spacing and distances of fire hydrants indicated in Table C105.1 increased by 100%.

Supporting Statement (including intent, need, and impact of the proposal):

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)
The Jackson Center
501 N. 2nd Street
Richmond, VA 23219-1321
Email Address: taso@dhcd.virginia.gov
Fax Number: (804) 371-7092
Phone Numbers: (804) 371-7140 or (804) 371-7150



VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: _____

Proponent Information

(Check one): Individual Government Entity Company

Name: Robby Dawson

Representing: Virginia Residential Sprinkler Coalition

Mailing Address: 9800 Government Center Pky, Chesterfield, VA 23832

Email Address: dawsonr@chesterfield.gov

Telephone Number: 804-717-6838

Proposal Information

Code(s) and Section(s): IFC Appendix C Table C105.1

Proposed Change (including all relevant section numbers, if multiple sections):

**TABLE C105.1
NUMBER AND DISTRIBUTION OF FIRE HYDRANTS**

FIRE-FLOW REQUIREMENT (GPM)	MINIMUM NUMBER OF HYDRANTS	AVERAGE SPACING BETWEEN HYDRANTS ^{a, b, c, f} (feet)	MAXIMUM DISTANCE FROM ANY POINT ON STREET OR ROAD FRONTAGE TO A HYDRANT ^{d, f}
1,750 or less	1	500	250
2,000 – 2,250	2	450	225
2,500	3	450	225
3,000	3	450	225
3,500 – 4,000	4	350	210
4,500 – 5,000	5	300	180
5,500	6	300	180
6,000	6	250	150
6,500 – 7,000	7	250	150
7,500 or more	8 or more ^e	200	150

For SI: 1 square foot = 0.0929 m², 1 gallon per minute = 3.785 L/m, 1 pound per square inch = 6.895kPa.

a. Reduce by 100 feet for dead-end streets or roads.

b. Where streets are provided with median dividers which can be crossed by fire fighters pulling hose lines, or where arterial streets are provided with four or more traffic lanes and have a traffic count of more than 30,000 vehicles per day, hydrant spacing shall average 500 feet on each side of the street and be arranged on an alternating basis up to a fire-flow requirement of 7,000 gallons per minute and 400 feet for higher fire-flow requirements.

c. Where new water mains are extended along streets where hydrants are not needed for protection of structures or similar fire problems, fire hydrants shall be provided at spacing not to exceed 1,000 feet to provide for transportation hazards.

d. Reduce by 50 feet for dead-end streets or roads.

e. One hydrant for each 1,000 gallons per minute or fraction thereof.

f. The fire code official shall be permitted to increase spacing and distances by 100% for residential use group developments when all dwellings are protected with fire sprinklers in accordance with NFPA 13, 13R, 13D or P2409 standards.

Supporting Statement (including intent, need, and impact of the proposal):

This change to Appendix C provides for a reduction in the number of hydrants required in developments that utilize residential sprinklers. The language in footnote f indicates "shall be permitted" to account for individual fire service equipment standards. For those departments that carry greater than 1000 feet of supply hose, it would be logical to extend the distance by 100%. For those that carry 1000 feet or less, the distance between hydrants may be extended to a reasonable distance based on the local operational capabilities.

Submittal Information

Date Submitted: September 7, 2009

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)

The Jackson Center

501 N. 2nd Street

Richmond, VA 23219-1321

Email Address: taso@dhcd.virginia.gov

Fax Number: (804) 371-7092

Phone Numbers: (804) 371-7140 or (804) 371-7150



I.] Change Section ~~508.5.1~~ 507.5.1 to read:

~~508.5.1.~~ 507.5.1. Where required, fire hydrant systems shall be located and installed as directed by the fire department. Fire hydrant systems shall conform to the written standards of the jurisdiction and the fire department.

[~~D.~~ Add Section ~~503.7~~ to read:

~~503.7. Fire lanes for existing buildings. The fire code official is authorized to designate public and private fire lanes as deemed necessary for the efficient and effective operation of fire apparatus. Fire lanes shall comply with Sections 503.2 through 503.6.~~

J. Add Section 507.5.1.1 to read:

507.5.1.1. Fire hydrant requirements for fully sprinklered residential developments. Notwithstanding Section 103.1.2, the number and distribution of fire hydrants in Table C105.1 of Appendix C of the IFC shall be permitted to be used in single family dwelling and townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code, with the spacing and distances of fire hydrants indicated in Table C105.1 increased by 100%.

~~E.~~ K.] Add Change Section ~~511~~ 510 to read:

Section ~~511~~ 510.

Maintenance of In-Building Emergency Communication Equipment.

~~511-1.~~ 510.1. General. In-building emergency communication equipment shall be maintained in accordance with USBC and the provisions of this section.

~~511-2.~~ 510.2. Additional in-building emergency communications installations. If it is determined by the locality that increased amplification of their emergency communication system is needed, the building owner shall allow the locality access as well as provide appropriate space within the building to install and maintain necessary additional communication equipment by the locality. If the building owner denies the locality access or appropriate space, or both, the building owner shall be responsible for the installation and maintenance of these additional systems.

~~511-3.~~ 510.3. Field tests. After providing reasonable notice to the owner or their representative, the fire official, police chief, or their agents shall have the right during normal business hours, or other mutually agreed upon time, to enter onto the property to conduct field tests to verify that the required level of radio coverage is present at no cost to the owner.

[13VAC5-51-133.5. IFC Chapter 6. Building Services and Systems.

A. Add a note to Section 603.7 to read:

Note: The fire code official may request a copy of the latest certificate of inspection from the Virginia Department of Labor and Industry for boilers and pressure vessels subject to such requirements. When the certificate is not available, the fire code official shall notify the Department of Labor and Industry to ensure that the required maintenance and testing is performed in accordance the Virginia Boiler and Pressure Vessel Regulations (16VAC25-50).

B. Add Section 604.6 to read:

604.6. Testing of Battery Powered Emergency Lights and Exit Signs. Required emergency lighting utilizing battery powered emergency lights or exit signs, or both, shall be tested annually. The emergency lights and exit signs shall be tested for proper operation for the time period established in the building code in effect when the equipment was installed. Written records of tests shall be retained by the owner of the building for a minimum of two years after the test is conducted and shall be made available to the fire code official upon request.

C. Change Section 605.10.1 to read:

605.10.1. Listed and labeled. Only portable electric space heaters listed and labeled in accordance with UL 1278 shall be used.

D. Change Section 609.3.3.2 to read:

609.3.3.2. Cleaning. Hoods, grease-removal devices, fans, ducts and other appurtenances shall be cleaned at intervals necessary to prevent the accumulation of grease based upon a written and posted cleaning schedule that shall be established and maintained on the premises by the owner or operator of the ventilation system. The schedule shall be originated by the owner or operator of the ventilation system based upon criteria particular to the cooking operation. Cleanings shall be recorded and the records shall state the extent, time and date of cleaning.]

13VAC5-51-135. IFC Chapter 9. Fire Protection Systems.

A. Change Section 901.4.2 to read:

901.4.2. Nonrequired fire protection systems. Nonrequired fire protection systems shall be maintained to function as originally installed. If any such systems are to be reduced in function or discontinued, approval shall be obtained from the building official in accordance with Section 103.8.1 of Part I of the USBC.

B. Delete Section 901.4.3.

C. Change Section 901.6 to read:



Chesterfield County, Virginia
Fire & EMS



Fire & Life Safety Division
9800 Government Center Parkway – P.O. Box 40 – Chesterfield, VA 23832
Phone: (804) 748-1426 – Fax: (804) 768-8766 – Internet: chesterfield.gov

James R. Dawson
Fire Marshal

September 27, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals signing the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Statewide Fire Prevention Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-51-133 H dealing with SFPC sections 507.3.1 and 507.3.2

This code sections was not properly vetted through the work group process and there was no opportunity for public comment. The changes made by the Codes and Standards Committee have a considerable impact to the fire prevention code and is in conflict with the concept of local adoption of the appendices of the International Fire Code. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

James R. Dawson, Jr.
Fire Marshal
CHESTERFIELD FIRE AND EMS

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
 DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: C-310.6(R313.1)(4)(a)

Proponent Information

(Check one): Individual Government Entity Company

Name: DHCD Staff (at the direction of the Codes and Standards Committee)

Email Address: _____

Telephone Number: _____

Proposal Information

Code(s) and Section(s): SFPC Sections 507.3.1 and 507.3.2

Proposed Change (including all relevant section numbers, if multiple sections):

Add new Section 507.3.1 and Table 507.3.1 to the IFC as follows:

507.3.1 Fire flow requirements for fully sprinklered residential developments. The fire flow requirements in Table 507.3.1 shall be permitted to be used for determining fire flow in single family dwelling and townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code.

Table 507.3.1
Minimum Required Fire-flow and Flow Duration for Fully Sprinklered Single Family Dwelling and Townhouse Developments

<u>Fire-flow Calculation Area (square feet)^{ac}</u>	<u>Fire-flow (gallons per minute)^b</u>	<u>Flow Duration (in hours)</u>
0-5,000	1,000	2
5,001-7,200	1,250	
7,201-8,200	1,500	
8,201-9,500	1,750	
9,501-11,300	2,000	
11,301-13,000	2,250	

For SI: 1 square foot = 0.0929 m², 1 gallon per minute = 3.785 L/m, 1 pound per square inch = 6.895 kPa.

- a. The fire flow calculation area shall be the total floor area of all floor levels within the exterior walls, and under the horizontal projections of the roof of a building.
- b. Measured at 20 psi residual pressure.
- c. Fire-flow and duration requirements for calculation areas exceeding 13,000 square feet are subject to approval by the fire code official.

Supporting Statement (including intent, need, and impact of the proposal):

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change
Number: _____

Proponent
Information

(Check one): Individual Government
Entity Company

Name: Robby Dawson, Chairman Representing: Virginia Residential Sprinkler Coalition

Mailing Address: 9800 Government Center Parkway, Chesterfield, VA 23832

Email Address: dawsonr@chesterfield.gov Telephone Number: 804-717-6838

Proposal Information

Code(s) and Section(s): IFC Appendix B Table B105.1

Proposed Change (including all relevant section numbers, if multiple sections):

See attached table

Supporting Statement (including intent, need, and impact of the proposal):

The reduction of required fire suppression water in structures protected with water based fire protection systems has been a long-standing trade-off in the International Building Code. With the addition of the residential sprinkler requirement in town home developments, and selected detached single family homes, the inclusion of these guidelines in the SFPC Appendix will allow local fire officials to base their decision for required fire flow on a consistent basis across the commonwealth.

The basis of the flows noted here are based on the fire ground formula of

$$\frac{\text{fire area square footage}}{3} = \text{required gpm}$$

These requirements also take into account the long-standing allowance of fire flow reductions when structures are equipped with a sprinkler system.

Cost savings associated with this change are difficult to estimate due to the variability between local water authorities. An estimate was prepared for a number of developments in Chesterfield County. The following is submitted as a comparison:

Small subdivision of 25 single family dwellings-
Cost as proposed - \$172,353
Cost with reduced fire flow (smaller water lines) - \$142,547
Savings - \$29,806 (\$1192 per unit)

Small townhouse project of 42 dwelling units-
Cost as proposed - \$176,389
Cost with reduced fire flow (smaller water lines) - \$143,556
Savings - \$32,833 (\$782 per unit)

Large subdivision of 103 single family dwellings -
Cost as proposed - \$524,781
Cost with reduced fire flow (smaller water lines) - \$433,381
Savings - \$91,400 (\$887 per unit)

These estimates are based on 3 planned developments currently in the approval process.

Submittal Information

Date Submitted: September 7, 2009 _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

Please submit the proposal to:

DHCD DBFR TASO (Technical Assistance and Services Office)

The Jackson Center

taso@dhcd.virginia.gov

501 N. 2nd Street

Richmond, VA 23219-1321

or (804) 371-7150

Email Address:

Fax Number: (804) 371-7092

Phone Numbers: (804) 371-7140



**TABLE B105.1
MINIMUM REQUIRED FIRE-FLOW AND FLOW DURATION FOR BUILDINGS***

FIRE-FLOW CALCULATION AREA (square feet)					FIRE-FLOW (gallons per minute) ^f	FLOW DURATION (hours)
Type IA and IB ^b	Type IIA and IIIA ^b	Type IV and V-A ^b	Type IIB and IIIB ^b	Type V-B ^b		
0-22,700	0-12,700	0-8,200	0-5,900	0-3,600 0-5,000 ^d	1,500 1,000 ^d	2
22,701-30,200	12,701-17,000	8,201-10,900	5,901-7,900	3,601-4,800 5,001-7,200 ^d	1,750 1,250 ^d	
30,201-38,700	17,001-21,800	10,901-12,900	7,901-9,800	4,801-6,200 7,201-8,200 ^d	2,000 1,500 ^d	
38,701-48,300	21,801-24,200	12,901-17,400	9,801-12,600	6,201-7,700 8,201-9,500 ^d	2,250 1,750 ^d	
48,301-59,000	24,201-33,200	17,401-21,300	12,601-15,400	7,701-9,400 9,501-11,000 ^d	2,500 2,000 ^d	
59,001-70,900	33,201-39,700	21,301-25,500	15,401-18,400	9,401-11,300 11,301-13,000 ^d	2,750 2,250 ^d	
70,901-83,700	39,701-47,100	25,501-30,100	18,401-21,800	11,301-13,400	3,000	3
83,701-97,700	47,101-54,900	30,101-35,200	21,801-25,900	13,401-15,600	3,250	
97,701-112,700	54,901-63,400	35,201-40,600	25,901-29,300	15,601-18,000	3,500	
112,701-128,700	63,401-72,400	40,601-46,400	29,301-33,500	18,001-20,600	3,750	
128,701-145,900	72,401-82,100	46,401-52,500	33,501-37,900	20,601-23,300	4,000	
145,901-164,200	82,101-92,400	52,501-59,100	37,901-42,700	23,301-26,300	4,250	
164,201-183,400	92,401-103,100	59,101-66,000	42,701-47,700	26,301-29,300	4,500	4
183,401-203,700	103,101-114,600	66,001-73,300	47,701-53,000	29,301-32,600	4,750	
203,701-225,200	114,601-126,700	73,301-81,100	53,001-58,600	32,601-36,000	5,000	
225,201-247,700	126,701-139,400	81,101-89,200	58,601-65,400	36,001-39,600	5,250	
247,701-271,200	139,401-152,600	89,201-97,700	65,401-70,600	39,601-43,400	5,500	
271,201-295,900	152,601-166,500	97,701-106,500	70,601-77,000	43,401-47,400	5,750	
295,901-Greater	166,501-Greater	106,501-115,800	77,001-83,700	47,401-51,500	6,000	
--	--	115,801-125,500	83,701-90,600	51,501-55,700	6,250	
--	--	125,501-135,500	90,601-97,900	55,701-60,200	6,500	
--	--	135,501-145,800	97,901-106,800	60,201-64,800	6,750	
--	--	145,801-156,700	106,801-113,200	64,801-69,600	7,000	
--	--	156,701-167,900	113,201-121,300	69,601-74,600	7,250	
--	--	167,901-179,400	121,301-129,600	74,601-79,800	7,500	
--	--	179,401-191,400	129,601-138,300	79,801-85,100	7,750	
--	--	191,401-Greater	138,301-Greater	85,101-Greater	8,000	

For SI: 1 square foot = 0.0929 m², 1 gallon per minute = 3.785 L/m, 1 pound per square inch = 6.895kPa.

a. The minimum required fire flow shall be allowed to be reduced by 25 percent for Group R.

b. Types of construction are based on the *International Building Code*.

c. Measured for 20 psi.

d. For use with town homes equipped with a residential sprinkler systems in accordance with R313.1 or when all detached single family homes in developments are equipped with sprinklers in accordance with NFPA13D, NFPA 13R or P2409.

Regulations

2. On construction and demolition sites fire apparatus access roads shall be permitted to be provided and maintained in accordance with Section 1410.1.

C. Add exception to Section 503.2.1 to read:

Exception: Fire apparatus access roads exclusively serving single family dwelling or townhouse developments that are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code shall have an unobstructed width of not less than 18 feet (5486 mm), exclusive of shoulders.

D. Add Section 503.7 to read:

503.7. Fire lanes for existing buildings. The fire code official is authorized to designate public and private fire lanes as deemed necessary for the efficient and effective operation of fire apparatus. Fire lanes shall comply with Sections 503.2 through 503.6.

E. Change the title of Section 506 to read "Key Boxes and Elevator Fire Service Keys."

F. Change Section 506.1 to read:

506.1. Where required. Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life-saving or firefighting purposes, the fire code official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with UL 1037 and shall contain keys to gain necessary access as required by the fire code official.

Exception: Existing key boxes are not required to be listed in accordance with UL 1037 unless replaced.

G. Add Section 506.3, including all subsections, to read:

506.3. Standardized fire service elevator keys. All buildings with elevators equipped with Phase I emergency recall or Phase II emergency in-car operation, or buildings equipped with fire service access or occupant evacuation elevators shall be equipped to operate with a standardized fire service key approved by the fire code official.

Exception: Where providing a standardized key is not possible due to the existing nonstandard elevator equipment, the owner shall be permitted to place the building's nonstandardized fire service elevator keys in a key box installed in accordance with Section 506.1.

506.3.1. Requirements for standardized fire service keys. Standardized fire service elevator keys shall comply with all of the following:

1. All fire service elevator keys within the jurisdiction shall be uniform and specific for the jurisdiction. Keys shall be cut to a uniform key code.

2. Fire service elevator keys shall be a patent protected design to prevent unauthorized duplication.

3. Fire service elevator keys subject to these rules shall be engraved with the words "DO NOT DUPLICATE."

506.3.2. Access to standardized fire service keys. Access to standardized fire service elevator keys shall be restricted to the following persons or groups:

1. Elevator owners or their authorized agents.
2. Elevator contractors.
3. Elevator inspectors of the jurisdiction.
4. Fire and building code officials of the jurisdiction.
5. The fire department and other emergency response agencies designated by the fire code official and the code official responsible for the enforcement of Part III, Maintenance, of the USBC.

506.3.3. Duplication or distribution of keys. No person may duplicate a standardized fire service elevator key or issue, give, or sell a duplicated key unless in accordance with this code.

506.3.4. Responsibility to provide keys. The building owner shall provide up to three standardized fire service elevator keys, if required by the fire code official, upon installation of a standardized fire service key switch or switches in the building.

H. Add Sections 507.3.1 and 507.3.2 to read:

507.3.1. Fire flow requirements for fully sprinklered residential developments. Notwithstanding Section 103.1.2, the fire flow requirements in Table B105.1 of Appendix B of the IFC, as modified by Section 507.3.2, shall be permitted to be used for determining fire flow in single family dwelling and townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code.

507.3.2. Modifications to Table B105.1. The first six rows of columns five and six of Table B105.1 of Appendix B of the IFC shall be modified as shown below for the use of Table B105.1 in Section 507.3.1.

<u>Type 5-B</u>	<u>Fire-flow (gallons per minute)</u>
<u>0-5000</u>	<u>1000</u>
<u>5001-7200</u>	<u>1250</u>
<u>7201-8200</u>	<u>1500</u>
<u>8201-9500</u>	<u>1750</u>
<u>9501-11300</u>	<u>2000</u>
<u>11301-13000</u>	<u>2250</u>



Chesterfield County, Virginia
Fire & EMS



Fire & Life Safety Division
9800 Government Center Parkway – P.O. Box 40 – Chesterfield, VA 23832
Phone: (804) 748-1426 – Fax: (804) 768-8766 – Internet: chesterfield.gov

James R. Dawson
Fire Marshal

September 27, 2010

Mr. Steve Calhoun
Department of Housing and Community Development
Regulatory Coordinator
Main Street Centre
600 East Main Street, Suite 300
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals signing the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Statewide Fire Prevention Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-51-133.5 dealing with SFPC section 609.3.3.2.

*Should be
section
133.5 I*

This code sections was not properly vetted through the work group process and there was no opportunity for public comment. The changes made by the Codes and Standards Committee have a considerable impact local fire official's ability to effectively enforce the fire prevention code and reduces safety in public buildings. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

James R. Dawson, Jr.
Fire Marshal
CHESTERFIELD FIRE AND EMS

VIRGINIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF BUILDING AND FIRE REGULATION

Code Change Form for the 2009 Code Change Cycle

Code Change Number: F-609.3.3.2

Proponent Information

(Check one): Individual Government Entity Company

Name: Robby Dawson

Representing: Virginia Fire Services Board

Mailing Address: 1005 Technology Park Drive, Glen Allen, VA 23059

Email Address: dawsonj@chesterfield.gov

Telephone Number: 804-717-6838

Proposal Information

Code(s) and Section(s): '09 IFC/SFPC Section 609.3.3.2 (Amended 6/22/09)

Proposed Change (including all relevant section numbers, if multiple sections):

609.3.3.2 Grease accumulation Cleaning. ~~If during the inspection it is found that hoods, grease-removal devices, fans ducts or other appurtenances have an accumulation of grease, such components shall be cleaned.~~ Hoods, grease-removal devices, fans, ducts and other appurtenances shall be cleaned at intervals necessary to prevent the accumulation of grease based upon a written and approved cleaning schedule that shall be established and maintained on the premises by the owner or operator of the ventilation system. The approved schedule shall be originated by the owner or operator of the ventilation system based upon criteria particular to the cooking operation and submitted to the fire official for acceptance and approval. Future cleaning schedule modifications may be made or required based upon a demonstrated need for such modification. Cleanings shall be recorded, and the records shall state the extent, time and date of cleaning.

Supporting Statement (including intent, need, and impact of the proposal):

Having a pre-approved and mutually agreed upon cleaning schedule removes subjective criteria. While it can be claimed the proposed language is vague or nebulous, it is purposefully so due to the wide range of cooking operations that precludes the development of a more rigid schedule using other criteria such as the number of seats, square footage, cooking arrangements, etc. This preclusion is necessary to accommodate the small take-out restaurant that fries or broils hundreds of greasy hamburgers in a single day versus a larger full service restaurant that in reality demonstrates the production of grease-laden vapors is of a lesser amount than the small take-out restaurant.

Submittal Information

Date Submitted: _____

The proposal may be submitted by email as an attachment, by fax, by mail, or by hand delivery.

~~I.] Change Section ~~508.5.1~~ 507.5.1 to read:~~

~~508.5.1. 507.5.1. Where required, Fire hydrant systems shall be located and installed as directed by the fire department. Fire hydrant systems shall conform to the written standards of the jurisdiction and the fire department.~~

~~[D. Add Section 503.7 to read:~~

~~503.7. Fire lanes for existing buildings. The fire code official is authorized to designate public and private fire lanes as deemed necessary for the efficient and effective operation of fire apparatus. Fire lanes shall comply with Sections 503.2 through 503.6.~~

~~J. Add Section 507.5.1.1 to read:~~

~~507.5.1.1. Fire hydrant requirements for fully sprinklered residential developments. Notwithstanding Section 103.1.2, the number and distribution of fire hydrants in Table C105.1 of Appendix C of the IFC shall be permitted to be used in single family dwelling and townhouse developments which are fully sprinklered as provided for in Sections R313.1 or R313.2 of the International Residential Code, with the spacing and distances of fire hydrants indicated in Table C105.1 increased by 100%.~~

~~E. K.] Add Change Section ~~511~~ 510 to read:~~

~~Section ~~511~~ 510.~~

~~Maintenance of In-Building Emergency Communication Equipment.~~

~~511.1. 510.1. General. In-building emergency communication equipment shall be maintained in accordance with USBC and the provisions of this section.~~

~~511.2. 510.2. Additional in-building emergency communications installations. If it is determined by the locality that increased amplification of their emergency communication system is needed, the building owner shall allow the locality access as well as provide appropriate space within the building to install and maintain necessary additional communication equipment by the locality. If the building owner denies the locality access or appropriate space, or both, the building owner shall be responsible for the installation and maintenance of these additional systems.~~

~~511.3. 510.3. Field tests. After providing reasonable notice to the owner or their representative, the fire official, police chief, or their agents shall have the right during normal business hours, or other mutually agreed upon time, to enter onto the property to conduct field tests to verify that the required level of radio coverage is present at no cost to the owner.~~

[13VAC5-51-133.5. IFC Chapter 6. Building Services and Systems.

A. Add a note to Section 603.7 to read:

Note: The fire code official may request a copy of the latest certificate of inspection from the Virginia Department of Labor and Industry for boilers and pressure vessels subject to such requirements. When the certificate is not available, the fire code official shall notify the Department of Labor and Industry to ensure that the required maintenance and testing is performed in accordance the Virginia Boiler and Pressure Vessel Regulations (16VAC25-50).

B. Add Section 604.6 to read:

604.6. Testing of Battery Powered Emergency Lights and Exit Signs. Required emergency lighting utilizing battery powered emergency lights or exit signs, or both, shall be tested annually. The emergency lights and exit signs shall be tested for proper operation for the time period established in the building code in effect when the equipment was installed. Written records of tests shall be retained by the owner of the building for a minimum of two years after the test is conducted and shall be made available to the fire code official upon request.

C. Change Section 605.10.1 to read:

605.10.1. Listed and labeled. Only portable electric space heaters listed and labeled in accordance with UL 1278 shall be used.

D. Change Section 609.3.3.2 to read:

609.3.3.2. Cleaning. Hoods, grease-removal devices, fans, ducts and other appurtenances shall be cleaned at intervals necessary to prevent the accumulation of grease based upon a written and posted cleaning schedule that shall be established and maintained on the premises by the owner or operator of the ventilation system. The schedule shall be originated by the owner or operator of the ventilation system based upon criteria particular to the cooking operation. Cleanings shall be recorded and the records shall state the extent, time and date of cleaning.]

13VAC5-51-135. IFC Chapter 9. Fire Protection Systems.

A. Change Section 901.4.2 to read:

901.4.2. Nonrequired fire protection systems. Nonrequired fire protection systems shall be maintained to function as originally installed. If any such systems are to be reduced in function or discontinued, approval shall be obtained from the building official in accordance with Section 103.8.1 of Part I of the USBC.

B. Delete Section 901.4.3.

C. Change Section 901.6 to read: