

Testimony From	Mod	Summary	Recommendation
Ken Brouillette Supporting Documents	Yes	Table 315.7.6 (1) looking at adding a footnote (a). There is some confusion regarding how much fire rated glazing you could have in these opening. Adds a pointer to section 716 of the International Building Code	BFP Approval Staff Comment: The testimony states that this is an existing amendment. However, the fire code TAG recommended “Delete existing amendment” because it matches the model code. It is shown with strikethrough in the CR-102. The table shown in the supporting documents is incorrect; it is from the 2018 code.
	Yes	This section was missed by the TAG. It references R-4 occupancies. It should be struck. 405.2 Occupant participation. Emergency fire and evacuation drills shall involve the actual evacuation of occupants to a selected assembly point and shall provide occupants with experience in exiting through required exits. Exceptions: 1. In ambulatory care facilities and Group I-2, the movement of care recipients to a safe area or to the exterior of the building is not required. 2. In Group I-1, Condition 2, the assembly point for residents is permitted to be within an adjacent smoke compartment. 3. In Group R-4, actual exiting from emergency escape and rescue openings shall not be required. Opening the emergency escape and rescue openings and signaling for help shall be an acceptable alternative. 4 3. In Group I-3, Conditions 2 through 5 where a defend-in-place response is permitted, the assembly point for detainees is permitted to be within an adjacent smoke compartment. 5 4. In Group I-3, Conditions 2 through 5, movement of detainees is not required to an assembly point where there are security concerns.	BFP Approval Staff Comment: <u>WAC 51-54A-0405 is not part of the CR-102.</u> In addition, the proposed modification seems unnecessary. Existing amendment in Chapter 2 reads as follows: R-4 Classification is not adopted. Any reference in this code to R-4 does not apply.
	Yes	403.3.1.1 Add safety and care recipients to keep language the same as the charging language 403.3.1.1 Fire safety and evacuation plan. The fire safety and evacuation plan required by Section 404 shall include a description of special staff actions. This shall include procedures for stabilizing <u>care recipients patients</u> in a <u>defend-in-place response</u> , staged evacuation, or full evacuation in conjunction with the entire building if part of a multitenant facility.	BFP Approval Staff Comment: Section 403.3.1 is a state amendment, and it is titled “Fire evacuation plan.” The language is almost the same as the language in model code Section 403.3.1.1 (Fire safety and evacuation plan). The text in blue shows the difference. The proposed modifications are already used in the model code text.
	Yes	404.2.3 Lockdown Plans the City of Seattle is proposing to enact this and with additional language in the charging section which states when required by the fire code official the lockdown plans shall be submitted for review to the Fire Code official and then they should	BFP Approval Staff Comment: <u>WAC 51-54A-0404 is not part of the CR-102.</u> This is a new proposal which did

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		<p>also include all of those items in there. The proposal is to put locked down drills into the state code, with the fire code official being able to review them when they desire. We're not requiring them; we are just saying that we'd like to review them.</p> <p>404.2.3 Lockdown plans. <u>When required by the fire code official, Lockdown plans shall only be submitted for review to permitted where such plans are approved by the fire code official and are shall be</u> in compliance with Sections 404.2.3.1 and 404.2.3.2.</p>	<p>not go through the standard process – TAG review, comment period/testimony, public hearing. This proposal may be considered substantially different from the proposal in the CR-102.</p>
	Yes	<p>918.0 Alerting Systems. Deleting this entire section and the reason for this is it states in the very beginning “An approved alerting system shall be provided in buildings and structures as required in Chapter 4 and this section” but it's not required in Chapter 4 and Section 918 does not require an alerting system so it's very confusing</p>	<p>Discuss at council</p>
	Yes	<p>308.1.9 Decorative open flame tables. “Gas-fired portable or fixed open flame fire tables and fireplaces”. looking at striking “and fireplaces” because it's not in the title. Also like to add some language in there that says “The protective device shall be not lower than the maximum height of the proposed flame. Add that gas fired portable or fixed open flame fire tables shall be used in accordance with their manufacturer's instructions and where required the fire code official is authorized to use technical assistance per section 104.8.2 to determine compliance with the section so this will allow the fire code official to use the technical assistance section</p>	<p>BFP Approval</p> <p>Staff comment: Adding “fireplaces” to the title seems a better option. Deleting “fireplaces” from the text changes the regulatory effect. This is a new proposal which did not go through the standard process – TAG review, comment period/testimony, public hearing. This proposal may be considered substantially different from the proposal in the CR-102. TAG recommended “keep amendment.”</p>
Shamim Rashid-Sumar		<p>fire safety concerns related to the proposed amendments to the International Building Code and the International Fire Code section 903.3.1.2 on the topic of NFPA 13R-Sprinkler Systems. This proposed amendment will roll back previous changes that were made to the IFC and the IBC to limit the use of NFPA 13R sprinkler systems to buildings where the floor level of the highest level is 30 feet or less above the level of the Fire Department vehicle access. . There are some distinct differences in the level of protection provided by NFP 13 and NFP 13R sprinkler systems. NFP 13 requires sprinkler protection in attics, closets, and bathrooms whereas NFP 13R does not. NFP 13R also allows for a shorter duration of water supply and allows for lesser water discharge demand. 2021 code development cycle, there was a change to that previous requirement considered to look at a different approach that's modeled after some of the provisions that are in a NFP 13R, to address attics, as I mentioned, NFP 13 does not require a sprinkler protection in attics. , in section 903.3.1.2.3 of NFP 13R, there is a trigger whereby NFP 13 is required for attics are certain height.</p>	<p>Disapprove: Keep 2018 language at 60'</p>

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		<p>In the alternate amendment that we are proposing to what is on the table, NFP 13 systems will still be required, where the floor level of the highest story is more than 30 feet above the lowest level of fire department access. However, you would still be able to use the 13R system for Group R2 occupancies where the roof assembly is less than 45 feet above the lowest level of Fire Department access. This approach of this alternate is to trigger NFP 13 protection based on the height of the attic and that set at a threshold of 45 feet. This would allow a typical four-story apartment building with nine-foot ceilings and one foot floor ceiling assemblies, an additional five feet to accommodate the height of a grade level slab that slopes downward. In considering this alternate proposal, the code will still strictly limit the permissible use of NFP 13R to R2 occupancies that don't exceed four stories, and which cannot include a combination of tall ceilings and upper-level mezzanine. This proposal has been limited to R2 occupancies. feel this alternate is middle ground between the proposal to limit to 60 feet and what was previously in the code at 30 feet. We ask for your consideration of this change that will appear in the 2024 International Building Code as an alternate to the amendment that's currently proposed for Washington state.</p>	
Steve Skalko		<p>Speak in opposition to this 13R proposal as it's presently structured. I think what's being proposed far exceeds what's intended to be used for 13R systems and I point that out for two reasons. One, it is of course for four-story buildings, but by allowing it to go to 60 feet you do start to raise the question that you end up with a building much taller than what the 13R system may have originally been intended, because it only addresses it as four-story buildings. What complicates the proposal is the fact that the measurement of 60 feet is going to be taken above the horizontal assembly if it's on a podium type structure, and I want you to realize what you in essence have is a building let's say sitting on top of a single-story parking garage that might be 20 feet high then you're going to put four more stories of that building on top of that, so you could technically have the roof system as high as 80 feet above the ground. When the proposal, as the 2021 IBC presently is worded, was put in, it was put in especially because of concerns by the fire service when they go to respond to these podium style buildings, having equipment capabilities to reach high up, and of course the complication is these buildings don't have full sprinkler protection, especially lacking sprinkler protection in the attics and other concealed spaces and that's why that limit was lowered down from what the previous IBC and, of course, the Washington State Code would permit</p>	Disapprove: Keep 2018 language at 60'
Miriam Villiard		Section 903.3.1.2. in an effort to preserve affordability of residential buildings by ensuring applicability of NFPA	No action required

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Supporting Documents		13R systems are preserved. Lower density multi-family buildings otherwise would have been subjected to a full NFPA 13 system which would drastically increase the cost of construction.	
Miriam Villiard Supporting Documents		Would like to see that exception added back to the code before official adoption by the SBCC. The state is in a housing affordability and homelessness crisis with not just a shortage of more than 225,000 single-family homes but also 157,000 rental units available for extremely low-income renters.	IBC Discussed
Randall King Supporting Documents		Section 429 – Electric vehicle charging infrastructure Kitsap Building Association would like to see that exception added back to the code before official adoption by the SBCC. <i>Exception: “Meeting the requirements will alter the local utility infrastructure design on the utility side of the meter and will increase the utility side cost to the homeowner or the developer by more than \$1,000 per dwelling unit.”</i>	IBC Discussed
Randall King Supporting Documents		Section 903.3.1.2 – Sprinkler Systems in Low-Rise Residential Buildings. Kitsap Building Association supports Section 903.3.1.2. in an effort to preserve affordability of residential buildings by ensuring applicability of NFPA 13R systems are preserved. Lower density multi-family buildings otherwise would have been subjected to a full NFPA 13 system which would drastically increase the cost of construction.	No action required