

**PUBLIC COMMENT on PROPOSED BUILDING STANDARDS**  
For Publication in Title 24, California Code of Regulations

See instructions for completing this form on Page 2.

**Commenter Contact Information**

Name: Roxanna Recinos-Serna Date: 10/19/2018  
Representing: City of Dublin  
Mailing Address: Number & Street: 100 Civic Plaza  
City: Dublin State: CA Zip Code: 94568  
Telephone #: (925)8336620 Email: roxanna.recinos-sera@dublin.ca.gov

**Proposed Building Standard**

Title 24 Part #: (select one) Part 2 Section #: \_\_\_\_\_  
Proposing State Agency OSFM  
This comment is intended for review during: (select one)  
☐ Code Advisory Committee  
☒ 45-Day Comment Period  
☐ 15-Day Comment Period  
☐ Commission Meeting  
Your recommendation based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form is: (select one)  
☐ Approve  
☒ Disapprove  
☐ Further Study Required  
☐ Approve as Amended

**In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a) printed on the back of this form. If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider. Please use separate pages if your comment does not fit in this space.**

Item 3 – add Table 1004.5 for detention facilities  
Item 6 – Addition of Occupancy Classification R2.2 for CDCR facilities, SB 112  
Item 7 – Assembly Occupancies Egress Width, Section 1005.3.1.and .2

**Attachments?**

☒ Check if you have attached additional pages. The number of pages attached is: 2

**For CBSC Office Use Only** Date Received: \_\_\_\_\_ Rulemaking Item #: \_\_\_\_\_

**Item 3 – add Table 1004.5 for detention facilities. This was disapproved by BFO**

This item was disapproved by the by the BFO Advisory Committee for lack of justification to add a whole table of occupant load factors for detention facilities where 3 of the 5 values are already in the 2018 Table 1004.5. Also, it was not demonstrated what in a detention facility required different value for classroom, 15 sf/occ versus 20 sf in the code?

In the 45-day package the response was to remove redundancy. Although the redundant values have been removed, additional values have been added with no justification or reasoning. The new values for Secure Interview Rooms, Refuge Areas, Enclosed Yard or Court were not presented as part of the original package. Establishing a 6 sf net for Refuge areas, whatever a refuge area is and 3 sf net for Courtyards appears excessive. A 1,000 sf court or yard would have a tabulated 333 occupants. Nothing in the current code has that type of occupant load factor when a detention facility requires more exits and exit width? This item should be disapproved and not brought forward or at least remove new material.

**Item 6 – Addition of Occupancy Classification R2.2 for CDCR facilities, SB 112.**

Although there may be a need for including this occupancy classification in the CBC, the manner this is being done creates a lot of redundant code sections. The Advisory Committee recommended Short term Furth Study to allow the OSFM to refine their code language. More than half of the proposed language is duplicating what is already stated in the code. None of this was addressed and the OSFM response was “No change need to be made”.

This item should be disapproved until the OSFM makes an attempt to write better code of remove this requirement.

**Item 7 – Assembly Occupancies Egress Width, Section 1005.3.1.and .2**

The proposed change is to require Assembly occupancies to be grouped with H and I-2 occupancies and require the use a 0.3 inches/occupant factor for calculating stair width, instead of the current standard 0.2 and 0.2 inches for other egress elements instead of 0.15 within a sprinkler protected building. This is a deviation from the Model Code, Sections 1005.3.1 and 2, Exceptions 1.

The main point is if the OSFM/State wants/needs to change the Model Code it had better have a good reason. This is normally because of State Legislation or a specific circumstance in the State, like earthquakes or wild fires, something nobody else has. Without substantiating reason on why California needs this, just being more restrictive is not god enough.

The response in the 45-Day package by the OSFM is the following:

**Response to Code Advisory Committee:** *The OSFM considered the short term further study recommendation and found that no changes needed to be made. The OSFM has considered the exiting risk factors for Group A occupancy buildings, and has determined that a decrease in stair width does not outweigh the public impact on the life safety requirement for egress. Sprinklers are a*

*requirement for assembly spaces based on the associated risks of the activities and large amounts of people in those spaces similar to H and I-2 occupancies. Egress is the primary protection of people in buildings by allowing them timely evacuation of building occupants. As shown in the graph, data from the California All Incident Reporting shows that fire incidents are increasing as well as property damage costs in assembly occupancies.*

The OSFM's reasoning is flawed, weak and lacks any real facts to require this change from a national standard on the following points:

- The BFO Advisory Committee "Disapproved" this item.
- Assembly occupancies are not the same as H or I occupancies when it comes to risk, as the OSFM is making the comparison.
- The current IBC permits the egress widths of 0.2/stairs and 0.15 inches/occupant for other egress elements within assembly occupancies of a sprinkle red building.
- Sprinklers are the biggest life safety element within a building and should/does allow for multiple code trade-offs.
- The "Incident Report" submitted by the OSFM, which shows an increase in incidents and cost associated with fires in assembly uses does not quantify the need for more egress width. Yes, the number of incidents and cost of damage has increased but how has this affected egress? What egress related issues have been associated the increased number of incidents? How many of the fires were created by egress issues? Were there any injuries or loss of life due to insufficient egress width associated with any of these incidents? There are no details associated with the numbers to support the proposed change.

Assembly occupancies are already adequately addressed in the code. The current standard used in the IBC does works. What is different in California that requires this?

One of the biggest issues associated with this change will be changes in use, where a proposed assembly occupancy wants to move into an existing building, possibly a multistory building. This could be limiting to the proposed use and could affect existing egress elements.

[End]