CHILD CARE LAW CENTER

May 18, 2026

Crystal Sujeski, Division Chief
Office of the State Fire Marshal
715 P Street
Sacramento, CA 94244-2460

By email to California Building Standards Commission (CBSC) cbsc@dgs.ca.gov, Subject line, "Office of the State Fire Marshal Public Comments"

Re: Input on the Office of State Fire Marshal Proposed Building Standards in 2025 California Building Code, Code of Regulations Title 24, Part 2

Dear Chief Sujeski,

Child care affects everyone in a community – from families who depend on it and employers who depend on them, to child care providers who nurture the next generation and the children who rely on their care to learn and grow.

We appreciate the opportunity to provide input on the Office of State Fire Marshal ("OSFM") proposed building standards to the California Building Code, California Code of Regulations Title 24, Part 2 ("Title 24"). Our recommendations are based on our work with child care providers, cities and counties, the OSFM, local fire departments, and Senate Bill 234, the Keeping Kids Close to Home Act (Skinner 2019).

Significant and widespread confusion persists among cities and counties, local fire departments, and licensed family child care homes about which fire and life safety requirements apply in certain child care settings. Although OSFM Information Bulletin 20-008 was issued in March 2021, we continue to hear from family child care providers that they experience inconsistent application of Title 24 regulations when they move or apply to expand their family child care license capacity. This is contrary to California law that requires local ordinance alignment with statewide standards:

> (c) …A city, county, city and county, or district shall not adopt or enforce a building ordinance or local rule or regulation relating to the subject of fire and life safety in large family daycare homes that is inconsistent with those standards adopted by the State Fire Marshal, except to the extent the building ordinance or local rule or regulation applies to all residences with the same zoning designation in which childcare is provided.

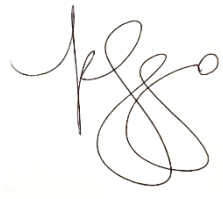
Cal. Health & Safety Code Section 1587.46.

Clear definitions and requirements are critical for accurate application of Title 24. Child care providers must understand what regulations do and do not apply to continue operating safely and maintain program stability. Child care providers operate on razor thin margins—47 percent of child care provider households rely on at least one public assistance program, and nearly 12 percent of the workforce lives in poverty.[1] When providers are misinformed they need upgrades based on the inaccurate application of Title 24, it causes additional financial burden or pushes them out of the field altogether. Additionally, cities and counties and local fire departments must know what regulations apply to family child care homes to comply with state law.

Consistent and equitable statewide application of Title 24 will result in more child care homes opening and expanding safely to meet significant child care needs in the state.

Please do not hesitate to contact Karina Laigo klaigo@childcarelaw.org with any questions about our comments.

Sincerely,



Karina Laigo
Senior Staff Attorney
Child Care Law Center

[1] U. Berkeley Ctr. Study Child Care Emp., *State Profiles California*, Early Childhood Workforce Index 2024: State Explorer, https://cscce.berkeley.edu/workforce-index-2024/states/california/ (last visited Jan. 27, 2026).

45-DAY EXPRESS TERMS FOR PROPOSED BUILDING STANDARDS OF THE STATE FIRE MARSHAL REGARDING THE 2025 CALIFORNIA BUILDING CODE, CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2 (SFM 01/25)

The state agency shall draft the regulations in plain, straightforward language, avoiding technical terms as much as possible and using a coherent and easily readable style. The agency shall draft the regulation in plain English. A notation shall follow the express terms of each regulation listing the specific statutes authorizing the adoption and listing specific statutes being implemented, interpreted, or made specific (Government Code Section 11346.2(a)(1)).

If using assistive technology, please adjust your settings to recognize underline, strikeout, italic and ellipsis.

LEGEND for EXPRESS TERMS (Based on model codes - Parts 2, 2.5, 3, 4, 5, 7, 9, 10)

- Model Code language appears upright
- Existing California amendments appear in *italic*
- Amended model code or new California amendments appear *underlined & italic*
- Repealed model code language appears ~~upright and in strikeout~~
- Repealed California amendments appear in ~~*italic and strikeout*~~
- Ellipses (…) indicate existing text remains unchanged

45-DAY EXPRESS TERMS

ITEM 1
Chapter 2 Definitions, Section 202 General definitions

[SFM proposes to amend model language, modify existing amendments, and propose new definitions.]

SUB-ITEM 1-1
CARBON MONOXIDE SOURCE

[SFM proposes to amend the “Carbon Monoxide Source” definition for clarity.]

CARBON MONOXIDE SOURCE. ~~A piece of commonly used equipment or permanently installed appliance, fireplace or process that produces or emits carbon monoxide gas.~~ *A combustion process that has the potential to produce carbon monoxide as a product of combustion under normal or abnormal conditions. Carbon monoxide sources include, but are not limited to solid-, liquid-, or gas-fueled appliances, equipment, devices, or systems, such as fireplaces, furnaces, heaters, boilers, cooking equipment, and vehicles with internal combustion engines.*

Carbon Monoxide Source, Direct. *A permanently installed carbon monoxide source that is located in an interior space.*

Carbon Monoxide Source, Forced-indirect. *A carbon monoxide source connected to an interior space by a forced air supply duct.*

SUB-ITEM 1-2
CHILD CARE CENTER; CHILD-CARE HOME, FAMILY; CHILD-CARE HOME, LARGE FAMILY; CHILD-CARE HOME, SMALL FAMILY; DAY-CARE, ADULT

[SFM proposes to modify existing amendments to align Title 24 and Title 22.]

[Child-Care definition has no proposed change; it is shown for reference purposes as the same meaning as Day Care.]

CHILDCARE FACILITY. *"Child day care facility" means a facility that provides nonmedical care to children under 18 years of age in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual on less than a 24-hour basis. Child day care facility includes day care centers, employer-sponsored child care centers, and family day care homes.*

Note: *"Child care" shall not be construed to preclude the use of cots or mats for napping purposes, provided all employees, attendants and staff personnel are awake and on duty in the area where napping occurs.*

CHILD CARE CENTER. *"Day care center" means a child day care facility other than a family day care home, and includes infant centers, preschools, extended day care facilities, and schoolage child care centers, and includes child care centers licensed pursuant to [California Health and Safety Code] Section 1596.951.*

~~DAY~~ CHILD-CARE HOME, FAMILY. *"Family daycare home" means a facility that regularly provides care, protection, and supervision for 14 or fewer children, in the provider's own home, for periods of less than 24 hours per day, while the parents or guardians are away, and is either a large family daycare home or a small family daycare home. The California Department of Social Services Community Care Licensing Division licenses small and large family child care homes.*

~~DAY~~ CHILD-CARE HOME, LARGE FAMILY. *"Large family daycare home" means a facility that provides care, protection, and supervision for 7 to 14 children, inclusive, including children under 10 years of age who reside at the home, as set forth in Section 1597.465 and as defined in regulations. (See Section 455). The California Department of Social Services Community Care Licensing Division licenses large family child care homes.*

~~DAY~~ CHILD-CARE HOME, SMALL FAMILY. *"Small family daycare home" means a facility that provides care, protection, and supervision for eight or fewer children, including children under 10 years of age who reside at the home, as set forth in Section 1597.44 and as defined in regulations. Small family ~~day~~ child-care homes are exempted from state fire and life safety regulations other than those state and local standards applicable to Group R-3 or R-2 occupancies. The California Department of Social Services Community Care Licensing Division licenses small family child care homes. ~~(See Health and Safety Code, Section 13143 (b).)~~*

DAY-CARE, ADULT. *For the purposes of these regulations, means the care of persons during any period of a 24-hour day where permanent sleeping accommodations are not provided. The time period shall not be more than 24 hours.*

Note: *"Day-care" shall not be construed to preclude the use of cots or mats for napping purposes, provided all employees, attendants and staff personnel are awake and on duty in the area where napping occurs.*

SUB-ITEM 1-3
COMBUSTIBLE LIQUID; FLAMMABLE LIQUID

[SFM proposes to amend the existing definitions of flammable and combustible liquids to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

COMBUSTIBLE LIQUID. A liquid having a closed cup flashpoint at or above 100°F (38°C). Combustible liquids shall be subdivided as follows:

The category of combustible liquids does not include compressed gases or cryogenic fluids or liquids that do not have a fire point when tested in accordance with ASTM D92.

Class II. *A liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as a Flammable Liquid (Category 3) and having a flashpoint at or above 100°F (38°C). Where the GHS category is not known, the following is acceptable for classification purposes:* Liquids having a closed cup flashpoint at or above 100°F (38°C) and below 140°F (60°C).

Class IIIA. *A liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as a Flammable Liquid (Category 4). Where the GHS category is not known, the following is acceptable for classification purposes:* Liquids having a closed cup flashpoint at or above 140°F (60°C) and below 200°F (93°C).

Class IIIB. Liquids having a closed cup flashpoint at or above 200°F (93°C).

FLAMMABLE LIQUID. A liquid having a closed cup flashpoint below 100°F (38°C). Flammable liquids are further categorized into a group known as Class I liquids. The Class I category is subdivided as follows:

Class IA. *A liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as a Flammable Liquid (Category 1). Where the GHS category is not known, the following is acceptable for classification purposes:* Liquids having a flashpoint below 73°F (23°C) and a boiling point below 100°F (38°C).

Class IB. *A liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as a Flammable Liquid (Category 2). Where the GHS category is not known, the following is acceptable for classification purposes:* Liquids having a flashpoint below 73°F (23°C) and a boiling point at or above 100°F (38°C).

Class IC. *A liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as a Flammable Liquid (Category 3) and having a flashpoint below 100°F (38°C). Where the GHS category is not known, the following is acceptable for classification purposes:* Liquids having a flashpoint at or above 73°F (23°C) and below 100°F (38°C).

[The following text is not part of Class IC definition as currently printed in 2024 IBC and 2025 CBC. It is proposed to be printed as separate paragraph in 2025 CBC to fix this typographical error.] The category of flammable liquids does not include compressed gases or cryogenic fluids or liquids that do not have a fire point when tested in accordance with ASTM D92.

SUB-ITEM 1-4
COMPRESSED GAS; COMPRESSED GAS, DISSOLVED; COMPRESSED GAS, GASEOUS; COMPRESSED GAS, LIQUEFIED

[SFM proposes to amend the existing definition and add new sub definitions for compressed gas to align with federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

COMPRESSED GAS. A material, or mixture of materials that:

1. Is a gas at 68°F (20°C) or less at 14.7 psia (101 kPa) of pressure; and
2. Has a boiling point of 68°F (20°C) or less at 14.7 psia (101 kPa) which is either liquefied, nonliquefied *(gaseous)* or in solution *(dissolved)* except those gases which have no other health- or physical-hazard properties are not considered to be compressed until the *gauge* pressure in the packaging exceeds ~~41 psia (282 kPa)~~ *29 psia (200 kPa)* at 68°F (20°C). *Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), compressed gases are categorized as Gases Under Pressure.*

~~The states of a compressed gas are categorized as follows:~~

1. ~~Nonliquefied compressed gases are gases, other than those in solution, which are in a packaging under the charged pressure and are entirely gaseous at a temperature of 68°F (20°C).~~
2. ~~Liquefied compressed gases are gases that, in a packaging under the charged pressure, are partially liquid at a temperature of 68°F (20°C).~~
3. ~~Compressed gases, or gases in solution, are non-liquefied gases that are dissolved in a solvent.~~
4. ~~Compressed gas mixtures consist of a mixture of two or more compressed gases contained in a packaging, the hazard properties of which are represented by the properties of the mixture as a whole.~~

COMPRESSED GAS, DISSOLVED*. Dissolved compressed gases, or gases in solution, are non-liquefied gases that are dissolved in a solvent. Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), these gases are categorized as Gases Under Pressure – Dissolved Gas.*

COMPRESSED GAS, GASEOUS. *Gaseous compressed gases are non-liquefied gases, other than those in solution (dissolved) which are in a packaging under the charged pressure and are entirely gaseous at a temperature of 68°F (20°C). Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), these gases are categorized as Gases Under Pressure – Compressed Gas.*

COMPRESSED GAS, LIQUEFIED. *Liquefied compressed gases are gases that, in a packaging under the charged pressure, are partially liquid at a temperature of 68°F (20°C). Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), these gases are categorized as Gases Under Pressure – Liquefied Gas.*

SUB-ITEM 1-5
CORROSIVE

[SFM proposes to amend the existing definition of corrosive to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

CORROSIVE. *A substance or mixture that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as either Skin Corrosion (Category 1A, 1B, or 1C), or Serious Eye Damage (Category 1). Where the GHS category is not known, the following shall be acceptable for classification purposes:*

A chemical that causes visible destruction of, or irreversible alterations in, living tissue by chemical action at the point of contact. A chemical shall be considered corrosive if, when tested on the intact skin of albino rabbits by the method described in DOTn 49 CFR Part 173.137, such chemical destroys or changes irreversibly the structure of the tissue at the point of contact following an exposure period of 4 hours. This term does not refer to action on inanimate surfaces.

SUB-ITEM 1-6
CRYOGENIC FLUID; CRYOGENIC FLUID, INERT; CRYOGENIC FLUID, FLAMMABLE; CRYOGENIC FLUID, OXIDIZING; FLAMMABLE CRYOGENIC FLUID; OXIDIZING CRYOGENIC FLUID

[SFM proposes to amend the existing definitions and add new sub definitions for cryogenic fluids to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

CRYOGENIC FLUID. A fluid having a boiling point lower than ~~-150°F (-101°C)~~ -

130°F (-89.9°C) at 14.7 pounds per square inch atmosphere (psia) (an absolute pressure of ~~101~~ *101.3* kPa). *Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), Cryogenic Fluids are categorized as a Gas Under Pressure – Refrigerated Liquefied Gas. However, not all GHS Refrigerated Liquefied Gases are Cryogenic Fluids.*

CRYOGENIC FLUID, INERT. *A cryogenic fluid that is an inert gas in its vapor state. These fluids are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Gases Under Pressure - Refrigerated Liquefied Gas.*

CRYOGENIC FLUID, FLAMMABLE. *A cryogenic fluid that is a flammable gas in its vapor state. These fluids are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Flammable Gas, Category 1A or Category 1B and Gases Under Pressure - Refrigerated Liquefied Gas.*

CRYOGENIC FLUID, OXIDIZING. *A cryogenic fluid that is an oxidizing gas in its vapor state. These fluids are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Oxidizing Gas, Category 1 and Gases Under Pressure - Refrigerated Liquefied Gas.*

…

FLAMMABLE CRYOGENIC FLUID. *See Cryogenic Fluid, Flammable.*

…

OXIDIZING CRYOGENIC FLUID. *See Cryogenic Fluid, Oxidizing.*

SUB-ITEM 1-7
EXPLOSIVE

[SFM proposes to amend the existing definition of explosive to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

EXPLOSIVE. …

UN/DOT Class 1 explosives. …

Division 1.1. *A chemical or item that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Explosive (Division 1.1). Where the GHS category is not known, the following is acceptable for classification purposes:*
Explosives that have a mass explosion hazard. A mass explosion is one which affects almost the entire load instantaneously.

Division 1.2. *A chemical or item that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Explosive (Division 1.2). Where the GHS category is not known, the following is acceptable for classification purposes:*
Explosives that have a projection hazard but not a mass explosion hazard.

Division 1.3. *A chemical or item that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Explosive (Division 1.3). Where the GHS category is not known, the following is acceptable for classification purposes:*
Explosives that have a fire hazard and either a minor blast hazard or a minor projection hazard or both, but not a mass explosion hazard.

Division 1.4. *A chemical or item that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Explosive (Division 1.4). Where the GHS category is not known, the following is acceptable for classification purposes:*
Explosives that pose a minor explosion hazard. The explosive effects are largely confined to the package and no projection of fragments of appreciable size or range is to be expected. An external fire must not cause virtually instantaneous explosion of almost the entire contents of the package.

Division 1.5. *A chemical or item that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Explosive (Division 1.5). Where the GHS category is not known, the following is acceptable for classification purposes:*
Very insensitive explosives. This division is comprised of substances that have a mass explosion hazard but which are so insensitive that there is very little probability of initiation or of transition from burning to detonation under normal conditions of transport.

Division 1.6. *A chemical or item that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Explosive (Division 1.6). Where the GHS category is not known, the following is acceptable for classification purposes:*
Extremely insensitive articles which do not have a mass explosion hazard. This division is comprised of articles that contain only extremely insensitive detonating substances and which demonstrate a negligible probability of accidental initiation or propagation.

SUB-ITEM 1-8
FLAMMABLE GAS

[SFM proposes to amend the existing definition of flammable gas to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

FLAMMABLE GAS. A material that is a gas at 68°F (20°C) or less at 14.7 pounds per square inch atmosphere (psia) (101 kPa) of pressure [a material that has a boiling point of 68°F (20°C) or less at 14.7 psia (101 kPa)] subdivided as follows:

1. Category 1A. A gas that meets either of the following:
    1.1. ~~*A gas which is*~~ Ignitable at 14.7 psia (101 kPa) when in a mixture of 13 percent or less by volume with air.

1.2. ~~*A gas with*~~ A flammable range at 14.7 psia (101 kPa) with air of at least 12 percent, regardless of the lower limit, unless data shows compliance with Category 1B.

2. Category 1B. A gas which meets the flammability criteria for Category 1A, is not pyrophoric or chemically unstable, and meets one or more of the following:

   2.1. A lower flammability limit of more than 6 percent by volume of air.

   2.2. A fundamental burning velocity of less than 3.9 inches/second (99 mm/s).

The limits specified shall be determined at 14.7 psi (101 kPa) of pressure and a temperature of 68°F (20°C) in accordance with ASTM E681.

Where not otherwise specified, the term “flammable gas” includes both Category 1A and 1B.

Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), Flammable Gases are categorized as a Flammable Gas (Category 1A or 1B) and a Gas Under Pressure – Compressed, Liquefied, Refrigerated Liquefied or Dissolved.

SUB-ITEM 1-9
FLAMMABLE SOLID

[SFM proposes to amend the existing definition of flammable solid to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

FLAMMABLE SOLID. *A solid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as a Flammable Solid (Category 1 or 2). Where the GHS category is not known, the following is acceptable for classification purposes:*

A solid, other than a blasting agent or explosive, that is capable of causing fire through friction, absorption of moisture, spontaneous chemical change or retained heat from manufacturing or processing, or which has an ignition temperature below 212°F (100°C) or which burns so vigorously and persistently when ignited as to create a serious hazard. A chemical shall be considered a flammable solid as determined in accordance with the test method of CPSC 16 CFR Part 1500.44, if it ignites and burns with a self-sustained flame at a rate greater than ~~0.1 inch (2.5 mm)~~ *0.0866 inch (2.2 mm)* per second along its major axis.

SUB-ITEM 1-10
HIGHLY TOXIC; TOXIC

[SFM proposes to amend the existing definitions of highly toxic and toxic to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

HIGHLY TOXIC. ~~A material which produces a lethal dose or lethal concentration which falls within any of the following categories:~~

A substance or mixture that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as any one of the following GHS Acute Toxicity categories:

Oral Category 1 or 2

Dermal Category 1 or 2

Inhalation Gases Category 1

Inhalation Vapors Category 1

Inhalation Dusts and Mists Category 1 or 2.

Where the GHS category is not known, use the following for classification purposes:

1. A chemical that has a median lethal dose (LD_{50}) of 50 milligrams or less per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
2. A chemical that has a median lethal dose (LD_{50}) of 200 milligrams or less per kilogram of body weight when administered by continuous contact for 24 hours (or less if death occurs within 24 hours) with the bare skin of albino rabbits weighing between 2 and 3 kilograms each.
3. A chemical that has a median lethal concentration (LC_{50}) in air of 200 parts per million by volume or less of gas or vapor, or 2 milligrams per liter or less of mist~~, fume~~ or dust, when administered by continuous inhalation for one hour to albino rats weighing between 200 and 300 grams each.

TOXIC. ~~A material which produces a lethal dose or lethal concentration which falls within any of the following categories:~~

A substance or mixture that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as any one of the following GHS Acute Toxicity categories:

Oral Category 3

Dermal Category 3

Inhalation Gases Category 2

Inhalation Gases Category 3 and having an LC50 ≤1,000 ppm (4 hour exposure)

Inhalation Vapors Category 2

Inhalation Vapors Category 3 and having an LC50 ≤4 mg/l (4 hour exposure)

Inhalation Dusts and Mists Category 3 or 4

Where the GHS category is not known, use the following for classification purposes:

1. A chemical that has a median lethal dose (LD_{50}) of more than 50 milligrams per kilogram, but not more than ~~500~~ *300* milligrams per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
2. A chemical that has a median lethal dose (LD_{50}) of more than 200 milligrams per kilogram but not more than 1,000 milligrams per kilogram of body weight when administered by continuous contact for 24 hours (or less if death occurs within 24 hours) with the bare skin of albino rabbits weighing between 2 and 3 kilograms each.
3. A chemical that has a median lethal concentration (LC_{50}) in air of more than 200 parts per million but not more than 2,000 parts per million by volume or less of gas or vapor, or more than 2 milligrams per liter but not more than 20 milligrams per liter of mist~~, fume~~ or dust, when administered by continuous inhalation for 1 hour (or less if death occurs within 1 hour) to albino rats weighing between 200 and 300 grams each.

SUB-ITEM 1-11
INFANT

[SFM proposes to modify existing amendments to align Title 24 and Title 22.]

INFANT. *~~Any child who because of age only, is unable to walk and requires the aid of another person to evacuate building. In no case shall the term "infant" mean a~~ A child under 2 years of age ~~or older~~.*

SUB-ITEM 1-12
NONPATIENT-CARE SUITE

[SFM, in collaboration with OSHPD, proposes modification to an existing amendment to align the intent and ensure consistency of enforcement.]

NONPATIENT-CARE SUITE. *In Group I-2 occupancies~~, a group of rooms or spaces within a suite for use as administrative, business and professional offices.~~ a care suite that is not intended for patient sleeping or care and its primary use is not storage or industrial.*

SUB-ITEM 1-13
ORGANIC PEROXIDE

[SFM proposes to amend the existing definitions and add new sub definitions for organic peroxide to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

ORGANIC PEROXIDE. ~~An~~ *Liquid or solid* organic ~~compound~~ *substances* that contain~~s~~ the bivalent -O-O- structure and which may be considered to be a structural derivative of hydrogen peroxide where one or both of the hydrogen atoms have been replaced by ~~an~~ organic radical*s. The term also includes organic peroxide formulations (mixtures).* Organic peroxides can present an explosion hazard (detonation or deflagration) or they can be shock sensitive. They can also decompose into various unstable compounds over an extended period of time.

Organic peroxide classifications used in the International Codes are based on the organic peroxide transport type determined in accordance with the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and the burning rate of the material.

Class I. *Describes those* ~~Those~~ formulations that are capable of deflagration but not detonation. *This class is comprised of organic peroxide formulations which, as packaged, are:*

1. *Organic peroxide Type B under GHS regardless of the burning rate.*
2. *Organic peroxide Type C or D under GHS with a large-scale burning rate equal to or greater than 300 kg/min.*
3. *Organic peroxide Type C or D under GHS with a small-scale burning rate equal to or greater than 9.0 kg/(min × m²) unless the large-scale burning rate is less than 300 kg/min.*
4. *Organic peroxides of Type C, D, E, F or G under GHS where the burning rate is not known.*

Class II*A*. *Describes those* ~~Those~~ formulations that burn very rapidly and that pose a moderate reactivity hazard. *This class is comprised of organic peroxide formulations which, as packaged, are:*

1. *Organic peroxide Type C or D under GHS with a large-scale burning rate equal to or greater than 140 kg/min, but less than 300 kg/min.*
2. *Organic peroxide Type C or D under GHS with a small-scale burning rate equal to or greater than 2.2 kg/(min × m²), but less than 9.0 kg/(min × m²).*
3. *Organic peroxide Type E under GHS with a large-scale burning rate equal to or greater than 140 kg/min.*
4. *Organic peroxide Type E under GHS with a small-scale burning rate equal to or greater than 2.2 kg/(min × m²).*

Class IIB. *Describes those formulations that burn rapidly and that pose a moderate reactivity hazard. This class is comprised of organic peroxide formulations which, as packaged, are:*

1. *Organic peroxide Type C under GHS with a large-scale burning rate less than 140 kg/min.*
2. *Organic peroxide Type C under GHS with a small-scale burning rate less than 2.2 kg/(min × m²).*
3. *Organic peroxide Type D or E under GHS with a large-scale burning rate equal to or greater than 60 kg/min, but less than 140 kg/min.*
4. *Organic peroxide Type D or E under GHS with a small-scale burning rate equal to or greater than 0.9 kg/(min × m²), but less than 2.2 kg/(min × m²).*

Class III. *Describes those* ~~Those~~ formulations that burn rapidly and that pose a moderate reactivity hazard. *This class is comprised of organic peroxide formulations which, as packaged, are:*

1. *Organic peroxide Type D under GHS with a large-scale burning rate less than 60 kg/min.*
2. *Organic peroxide Type D under GHS with a small-scale burning rate less than 0.9 kg/(min × m²).*

3. *Organic peroxide Type E under GHS with a large-scale burning rate equal to or greater than 10 kg/min, but less than 60 kg/min.*
4. *Organic peroxide Type E under GHS with a small-scale burning rate less than 0.9 kg/(min × m²).*
5. *Organic peroxide Type F under GHS with a large-scale burning rate equal to or greater than 10 kg/min.*
6. *Organic peroxide Type F under GHS regardless of the small-scale burning rate.*

Class IV. *Describes those* ~~Those~~ formulations that burn in the same manner as ordinary combustibles and that pose a minimal reactivity hazard. *This class is comprised of organic peroxide formulations which, as packaged, are organic peroxide Type E or F under GHS with a large-scale burning rate less than 10 kg/min.*

Class V. *Describes those* ~~Those~~ formulations that burn with less intensity than ordinary combustibles or do not sustain combustion and that pose no reactivity hazard. *This class is comprised of organic peroxide formulations which, as packaged, are organic peroxide Type G under GHS.*

~~**Unclassified detonable**~~ ***Detonable*.** Organic peroxides that are capable of detonation. These peroxides pose an extremely high-explosion hazard through rapid explosive decomposition. *This class is comprised of organic peroxide formulations which are organic peroxide Type A under GHS.*

SUB-ITEM 1-14
OXIDIZER

[SFM proposes to amend the existing definition of oxidizer to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

OXIDIZER. A material that readily yields oxygen or other oxidizing gas, or that readily reacts to promote or initiate combustion of combustible materials and, if heated or contaminated, can result in vigorous self-sustained decomposition.

Class 4. *A solid or liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as either Oxidizing Solids (Category 1) or Oxidizing Liquids (Category 1) and which have evidence of explosive properties or are packaged for transport in Packing Group I. Where the GHS category is not known, the following is acceptable for classification purposes:* An oxidizer that can undergo an explosive reaction due to contamination or exposure to thermal or physical shock and that causes a severe increase in the burning rate of combustible materials with which it comes into contact. Additionally, the oxidizer causes a severe increase in the burning rate and can cause spontaneous ignition of the combustibles.

Class 3. *A solid or liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as either Oxidizing Solids (Category 1) or Oxidizing Liquids (Category 1) and is not otherwise classified as Class 4. Where the GHS category is not known, the following is*

acceptable for classification purposes: An oxidizer that causes a severe increase in the burning rate of combustible materials with which it comes into contact.

Class 2. *A solid or liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as either Oxidizing Solids (Category 2) or Oxidizing Liquids (Category 2). Where the GHS category is not known, the following is acceptable for classification purposes:* An oxidizer that will cause a moderate increase in the burning rate of combustible materials with which it comes into contact.

Class 1. *A solid or liquid that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as either Oxidizing Solids (Category 3) or Oxidizing Liquids (Category 3). Where the GHS category is not known, the following is acceptable for classification purposes:* An oxidizer that does not moderately increase in the burning rate of combustible materials with which it comes into contact.

SUB-ITEM 1-15
OXIDIZING GAS

[SFM proposes to amend the existing definition of oxidizing gas to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

OXIDIZING GAS. *A compressed gas that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as an Oxidizing Gas, Category 1. Where the GHS category is not known, the following is acceptable for classification purposes:* A gas that can support and accelerate combustion of other materials more than air does.

SUB-ITEM 1-16
PYROPHORIC

[SFM proposes to amend the existing definition of pyrophoric to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

PYROPHORIC. *A substance or mixture that is categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Pyrophoric Gas (Category 1A), Pyrophoric Solid (Category 1), or Pyrophoric Liquid (Category 1). Where the GHS category is not known, the following shall be acceptable for classification purposes:*
A chemical with an autoignition temperature in air, at or below a temperature of 130°F (54.4°C).

SUB-ITEM 1-17
UNSTABLE (REACTIVE) MATERIAL

[SFM proposes to amend the existing definition of unstable (reactive) material to

align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials regulations.]

UNSTABLE (REACTIVE) MATERIAL. A material, other than an explosive, which in the pure state or as commercially produced, will vigorously polymerize, decompose, condense or become self-reactive and undergo other violent chemical changes, including explosion, when exposed to heat, friction or shock, or in the absence of an inhibitor~~, or in the presence of contaminants, or in contact with incompatible materials~~. Unstable (reactive) materials are subdivided as follows:

Class 4. Materials that in themselves are readily capable of detonation or explosive decomposition or explosive reaction at normal temperature and pressure. This class includes materials that are sensitive to mechanical or localized thermal shock at normal temperature and pressure.
This Class includes liquid or solid materials that are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Self-Reactive (Category A) and can include compressed gases categorized as Chemically Unstable (Type A).

Class 3. Materials that in themselves are capable of detonation or of explosive decomposition or explosive reaction but which require a strong initiating source or which must be heated under confinement before initiation. This class includes materials that are sensitive to thermal or mechanical shock at elevated temperatures and pressures.
This Class includes liquid or solid materials that are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Self-Reactive (Category B) and can include compressed gases categorized as Chemically Unstable (Type B).

Class 2. Materials that in themselves are normally unstable and readily undergo violent chemical change but do not detonate. This class includes materials that can undergo chemical change with rapid release of energy at normal temperature and pressure, and that can undergo violent chemical change at elevated temperature and pressure.
This Class includes liquid or solid materials that are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Self-Reactive (Category C or D).

Class 1. Materials that in themselves are normally stable but which can become unstable at elevated temperature and pressure.
This Class includes liquid or solid materials that are categorized under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) as Self-Reactive (Category E or F).

SUB-ITEM 1-18
WATER-REACTIVE MATERIAL

[SFM proposes to amend the existing definition of water reactive to align with the federal Occupational Safety and Health Administration (OSHA) hazardous materials

regulations.]

WATER-REACTIVE MATERIAL. A material that explodes; violently reacts; produces flammable, toxic or other hazardous gases; or evolves enough heat to cause auto- ignition or ignition of combustibles upon exposure to water or moisture. Water-reactive materials are subdivided as follows:

Class 3. Materials that react explosively with water without requiring heat or confinement. *Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), these are classified as substances or mixtures which, in contact with water, emit flammable gases (Category 1).*

Class 2. Materials that react violently with water or have the ability to boil water. Materials that produce flammable, toxic or other hazardous gases, or evolve enough heat to cause autoignition or ignition of combustibles upon exposure to water or moisture. *Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), these are classified as substances or mixtures which, in contact with water, emit flammable gases (Category 2).*

Class 1. Materials that react with water with some release of energy, but not violently. *Under the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), these are classified as substances or mixtures which, in contact with water, emit flammable gases (Category 3).*

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 1596.78, 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

ITEM 2
Chapter 3 Occupancy Classification and Use

[SFM proposes to modify model code and existing amendments to align Title 24 and Title 22.]

SUB-ITEM 2-1
Section 305.2 Group E, child-care facilities and subsections

[SFM proposes to modify model code and existing amendments to align Title 24 and Title 22.]

305.2 Group E, *child*-care facilities. This group includes buildings and structures or portions thereof occupied by more than *six* children *36 months* of age and *older*

who receive educational, supervision or personal care services for fewer than 24 hours per day. *Infants and toddlers are allowed in a Group E child care when the facility complies with California Building Code Section 308.5.1.*

Exception: [SFM] *A building or structure that does not meet the requirements of California Building Code Section 308.5.1 or a ~~A~~ child-care facility not otherwise classified as Group R-3 occupancy, where occupants are not capable of responding to an emergency situation without physical assistance from the staff shall be classified as Group I-4. ~~Infants and toddlers are allowed in a Group E child care when the facility complies with California Building Code Section 305.2.1, 305.2.2, 305.2.3 or 308.5.1.~~*

…

305.2.2 *Six* ~~Five~~ or fewer children. A facility having *six* ~~five~~ or fewer children receiving such ~~day~~ *child* care shall be classified as part of the primary occupancy.

305.2.3 *Six* ~~Five~~ or fewer children in a dwelling unit. A facility such as the above within a dwelling unit and having *six* ~~five~~ or fewer children receiving such ~~day~~ *child* care shall be classified as a Group R-3 occupancy or shall comply with the *California Residential Code*.

SUB-ITEM 2-2
Section 308.5 Institutional Group I-4, day care and child-care facilities and subsections

[SFM proposes to modify model code and existing amendments to align Title 24 and Title 22.]

308.5 Institutional Group I-4, day care *and child-care* facilities. Institutional Group I-4 occupancy shall include buildings and structures, *and portions thereof*, occupied by more than *six clients* of any age who receive custodial care for fewer than 24 hours per day by persons other than parents or guardians; relatives by blood, marriage or adoption; and in a place other than the home of the *clients* cared for. This group shall include, but not be limited to, the following:

Adult day care

Child ~~day~~ care *(not classified as Group E)*

…

308.5.2 Within a place of religious worship. Rooms and spaces within places of religious worship providing such care during religious functions shall be *classified as part of the primary occupancy where not licensed for child-care purposes by the Department of Social Services.* ~~*licensed by the California State Department Health Services as required by Health and Safety Code Division 2 Chapter 3.5.*~~

308.5.3 *Six* ~~**Five**~~ **or fewer persons receiving care.** A facility having *six* ~~five~~ or fewer persons receiving *such child care shall be classified as part of the primary occupancy* ~~custodial care shall be *licensed pursuant to Health and Safety Code Division 2 Chapter 3.5 or 3.6*~~.

308.5.4 *Six* or fewer persons receiving care in a dwelling unit. A facility such as the above within a dwelling unit and having *six* or fewer persons receiving custodial care shall be classified as a Group R-3 occupancy~~, *where occupants are not capable of responding to an emergency situation without physical assistance from the staff shall be classified as a Group I-4*~~.

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

ITEM 3
Chapter 7 Fire and Smoke Protection Features, Section 708 Fire Partitions

[SFM, in collaboration with OSHPD, proposes to repeal item 6 and title it as “Reserved” and preserve model code numbering.]

SUB-ITEM 3-1
Section 708.1 General.

708.1 General. The following wall assemblies shall comply with this section:

1. …
6. ~~Walls separating ambulatory care facilities from adjacent spaces, corridors or tenant as required by Section 422.2.~~ *Reserved.*
7. …

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

ITEM 4
Chapter 9 Fire Protection and Life Safety Systems, Section 907 Fire Alarm and Detection Systems

[SFM proposes modifications and relocation of existing amendments.]

SUB-ITEM 4-1
Sections 907.2.5.1, 907.2.6.3.4, 907.2.28.1 and 907.6.4

[SFM proposes relocating existing CA amendments that are duplicative with the model code and relocating existing amendments to 907.2.5.1, 907.2.6.3.4, 907.2.28.1.]

907.2.5.1 Group H occupancies located on the 11th story and above. *Manual fire alarm boxes shall be required on each side of the 2-hour fire-smoke barrier and at each exit on the 11th story and above. For purposes of annunciation and notification, each side of the 2-hour fire-smoke barrier shall be considered a separate zone.*

…

907.2.6.3.4 System annunciation. *…*

Fire and trouble signals of fire alarm systems and sprinkler water-flow and supervisory signals of extinguishing systems shall be annunciated in an area designated as the facility control center which shall be constantly attended by staff personnel. All such signals shall produce both an audible signal and visual display at the facility control center indicating the building, floor zone, cell complex, or other designated area from which the signal originated, in accordance with Section 907.6.4.

…

907.2.28.1 Group L occupancies located on the 11th story and above. *Manual fire alarm boxes shall be required on each side of the 2-hour fire-smoke barrier and at each exit on the 11th story and above. For purposes of annunciation and notification, each side of the 2-hour fire-smoke barrier shall be considered a separate zone.*

…

907.6.4 Zones. [SFM repeals existing amendments which replace model code and proposes to bring the following model code language back to the code.] Each floor shall be zoned separately and a zone shall not exceed 22,500 square feet (2090 m2). The length of any zone shall not exceed 300 feet (91 440 mm) in any direction. ~~*Fire alarm systems shall be divided into zones where required by this section. For the purposes of annunciation and notification, zoning shall be in accordance with the following:*~~

1. ~~*Where the fire-protective signaling system serves more than one building, each building shall be considered as a separate zone.*~~
2. ~~*Each floor of a building shall be considered as a separate zone.*~~
3. ~~*Each section of floor of a building that is separated by fire walls or by horizontal exits shall be considered as a separate zone.*~~

~~*4. Each zone shall not exceed 22,500 square feet (2090 m^2). The length of any zone shall not exceed 300 feet (91 440 mm) in any direction.*~~

Exception: Automatic sprinkler system zones shall not exceed the area permitted by NFPA 13.

~~*5. For Group I-3 occupancies each cell complex shall be considered a separate zone.*~~ *[Language relocated to Section 907.2.6.3.4.]*

~~*6. For Group H and L occupancies on the 11th story and above, each side of the 2-hour fire-smoke barrier shall be considered a separate zone.*~~ *[Language relocated to Sections 907.2.5.1 and 907.2.28.1.]*

~~*7. Annunciation shall be further divided into zones where deemed necessary by the enforcing agency.*~~

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

ITEM 5
Chapter 9 Fire Protection and Life Safety Systems, Section 915 Carbon Monoxide (CO) Detection

SUB-ITEM 5-1
Section 915.2 Locations.

[SFM proposes to make editorial corrections and clarity of the intent of the regulations.]

…

[F] 915.2 Locations. Carbon monoxide detection shall be installed *in accordance with the manufacturer's published instructions* in the locations specified in Sections 915.2.1 through ~~915.2.3~~ *915.2.7*.

...

[F] 915.2.3 Group E occupancies. A carbon monoxide system that uses carbon monoxide detectors shall be installed in Group E occupancies *where classrooms include any of the conditions identified in Section 915.1.1* ~~*Sections 915.1.2 through 915.1.6*~~. ...

915.2.4 Interior spaces with direct carbon monoxide sources. *In all occupancies, interior spaces with a direct carbon monoxide source shall be provided with carbon monoxide detection located in close proximity to the direct carbon monoxide source and in accordance with Section 915.3.*

Exception: *Where environmental conditions in an enclosed space are*

incompatible with carbon monoxide detection devices, carbon monoxide detection shall be provided in an approved adjacent location.

915.2.5 Interior spaces adjacent to a space containing a carbon monoxide source. *Interior spaces that are separated from and adjacent to an enclosed parking garage or an interior space that contains a direct carbon monoxide source shall be provided with carbon monoxide detection if there are communicating openings between the spaces. Detection devices shall be located in close proximity to communicating openings on the side that is furthest from the carbon monoxide source and in accordance with Section 915.3.*

Exceptions:

1. *Where communicating openings between the space containing a direct carbon monoxide source and the adjacent space are permanently sealed airtight, carbon monoxide detection is not required for the adjacent space.*
2. *Where the fire code official determines that the volume or configuration of the adjacent interior space is such that dilution or geometry would diminish the effectiveness of carbon monoxide detection devices located in such spaces, detection devices additional to those required by Section 915.2.1 shall be located on the side of communicating openings that is closest to the carbon monoxide source.*

[F] 915.2.4*6* CO-producing forced-air furnace. ...*[renumbered section]***

[F] 915.2.5~~5~~*7* Private garages. *... [renumbered section]*

~~**[F] 915.2.6 All other occupancies.** For locations other than those specified in Section 915.2.1 through 915.2.5, carbon monoxide detectors shall be installed on the ceiling of enclosed rooms or spaces containing CO producing devices or served by a CO source forced-air furnace.~~

~~**Exception:** Where environmental conditions prohibit the installation of carbon monoxide detector in an enclosed room or space, carbon monoxide detectors shall be installed in an approved enclosed location contiguous with the room or space that contains a CO source.~~

...

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

ITEM 6
Chapter 10 Means of Egress

SUB-ITEM 6-1
Section 1010.2.12 Delayed egress

[SFM proposes to delete model language “or heat”.]

1010.2.12 Delayed egress. Delayed egress electrical locking systems shall be permitted on doors in the means of egress serving the following occupancies in buildings that are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 *and* an approved automatic smoke ~~or heat~~ detection system installed in accordance with Section 907.

1. Group B, F, I, M, R, S and U occupancies.
2. Group E classrooms with an occupant load of less than 50.
3. In courtrooms in Group A-3 and B occupancies, delayed egress electrical locking systems shall be permitted to be installed on exit or exit access doors, other than the main exit or exit access door, in buildings that are equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 *and an approved automatic smoke detection system installed in accordance with Section 907.*

SUB-ITEM 6-2
Table 1006.3.4(1) Stories and occupiable roofs with one exit or access to one exit for R-2 and R-3 occupancies

[SFM proposes to carry forward the existing amendment to this table footnote a which was erroneously omitted during the printing of the code.]

TABLE 1006.3.4(1)—STORIES AND OCCUPIABLE ROOFS WITH ONE EXIT OR ACCESS TO ONE EXIT FOR R-2 *AND R-3* OCCUPANCIES

[No changes in the table are proposed. The proposed change is in the footnote a.]

TABLE 1006.3.4(1)—STORIES AND OCCUPIABLE ROOFS WITH ONE EXIT OR ACCESS TO ONE EXIT FOR R-2 *AND R-3* OCCUPANCIES			
STORY	OCCUPANCY	MAXIMUM NUMBER OF DWELLING UNITS	MAXIMUM EXIT ACCESS TRAVEL DISTANCE
Basement, first, second or third story above grade plane and occupiable roofs over the first or second story above grade plane	R-2[a, b, c] *R-3*[a]	4 dwelling units *NA*	125 feet *NA*
Fourth story above grade plane and higher	*R-3*[a]	NA	*125 feet*

...

a. Buildings classified as Group R-2 *or R-3* equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1 or 903.3.1.2 and provided with emergency escape and rescue openings in accordance with Section 1031.

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.

ITEM 7
Chapter 35 Referenced Standards

SUB-ITEM 7-1
NFPA 72-*25* National Fire Alarm Signaling Code, Section 12.4.2 Pathway Survivability Level 1.

[The SFM proposes this amendment to NFPA 72, Section 12.4.2, to clarify requirements for "Pathway Survivability Level 1". Existing NFPA 72, Section 12.4.2 language, which is not currently in 2025 CBC Chapter 35, is shown in upright text below.]

Revise Section 12.4.2 as follows:

12.4.2 Pathway Survivability Level 1. Pathway survivability Level 1 shall consist of ~~pathways~~ *one of the following:*

(1) *Pathways* in buildings that are fully protected by an automatic sprinkler system in accordance with NFPA 13 with any interconnecting conductors, cables, or other physical pathways protected by metal raceways or metal armored cables.
(2) *Pathways in buildings that are protected by an automatic sprinkler system in accordance with NFPA 13R with any interconnecting conductors, cables, or other physical pathways protected by metal raceways or metal armored cables and are installed in sprinkler protected areas only.*

SUB-ITEM 7-2
NFPA 72-25 National Fire Alarm Signaling Code, Section 26.2.11.3

[The SFM proposes to delete Section 26.2.11.3. Existing NFPA 72, Section 26.2.11.3 language shown in upright and strikeout text below is not printed in 2025 CBC Chapter 35 and is shown here to make it clear what NFPA 72 language SFM intends to delete as an amendment in 2025 CBC.]

Delete Section 26.2.11.3

~~**26.2.11.3** ASP facilities that support the delivery of signals to a supervising station from a protected premises fire alarm system installed in accordance with this Code shall conform to the construction, fire protection, physical security, cybersecurity, emergency lighting, power, communications infrastructure, and service resiliency requirements contained in UL 827, Central-Station Alarm Services.~~

Notation:

Authority: Health and Safety Code Sections 1250, 1502, 1568.02, 1569.70 - 1569.74, 1597.44 - 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13145, 13146, 13211, 16022.5, 17921, 18928, 18949.2, 25500 through 25545; Government Code Sections 51176, 51177, 51178, 51179 and 51189; Public Education Code 17074.50; Public Resources Code Sections 4201 through 4204.

Reference(s): Health and Safety Code Sections 13108, 13108.5, 13113, 13113.5, 13114, 13132, 13132.7, 13133, 13135, 13143, 13143.1, 13143.2, 13143.6, 13143.9, 13145, 13146, 13210, 13211, 16022.5, 17921.