WITHDRAWN:
ADM38-13: Proposal has been withdrawn
F112-13: Public Comment has been withdrawn
RB88-13: Proposal has been withdrawn
RB379-13: Proposal has been withdrawn
RB452-13: Proposal has been withdrawn

F212-13 Part I: Corrections to Public Comment 3 as follows:

Public Comment 3:

Robert J Davidson, Davidson Code Concepts, LLC, representing self, requests Approval as Modified by this Public Comment.

Modify the proposal as follows:

SECTION 1103
FIRE SAFETY REQUIREMENTS FOR EXISTING BUILDING

1103.1 Required construction. Existing buildings shall comply with not less than the minimum provisions specified in Table 1103.1 and as further enumerated in Sections 1103.2 through 1103.9.

The provisions of this chapter shall not be construed to allow the elimination of fire protection systems or a reduction in the level of fire safety provided in buildings constructed in accordance with previously adopted codes.

Exceptions:

1. Where a change in fire resistance rating has been approved in accordance with Section 803.6 of the International Existing Building Code. Where approved in accordance with Section 102.4, in Group I-2 Condition 2 buildings where an automatic sprinkler system installed in accordance with Section 903.3.1.1 has been added and the building is now sprinklered throughout, the existing fire resistance ratings, opening protectives, penetrations and joints in assemblies are not required to be maintained where such fire resistance ratings, opening protectives, penetrations and joints are not required in new construction for sprinklered buildings.

2. Group U occupancies.

SECTION 1104
MEANS OF EGRESS FOR EXISTING BUILDINGS

1104.1 General. Means of egress in existing buildings shall comply with the minimum egress requirements when specified in Table 1103.1 as further enumerated in Sections 1104.2 through 1104.24, and the building code that applied at the time of construction. Where the provisions of this chapter conflict with the building code that applied at the time of construction, the most restrictive provision shall apply. Existing buildings that were not required to comply with a building code at the time of construction shall comply with the minimum egress requirements when specified in Table 1103.1 as further enumerated in Sections 1104.2 through 1104.24.

Exception: Where approved in accordance with Section 102.4, in Group I-2 Condition 2, buildings where an automatic sprinkler system installed in accordance with Section 903.3.1.1 has been added and the building is now sprinklered throughout, the existing fire resistance ratings, opening protectives, penetrations and joints in assemblies are not required to be maintained where such fire resistance ratings, opening protectives, penetrations and joints are not required in new construction for sprinklered buildings.

Commenter’s Reason: In response to the committee reason statement this proposal coordinates the IFC with the new language added to the IEBC by EB26-13 with a direct reference to the new language. This puts into place a process for what is currently happening. Jurisdictions are granting approvals for passive fire protection reduction without clear guidance from the family of I-Codes. In some cases the reductions can be haphazardly approved and when
buildings are not provided with an automatic fire suppression system throughout. The requirement is for the entire building to be sprinklered before this evaluation is considered and the pointer to the new Section 803.6 affirms that requirement and provides for a thorough review of the passive protection the applicant is seeking to obtain approval for reduction. This will have the added benefit of stopping the reduction in passive protections for projects to individual work areas or smoke compartments. The building would have to be considered as a whole.

EB26 is included here for reference.

**EB26-13 AM**

803.6 Fire-resistance ratings. Where approved by the code official, buildings where an automatic sprinkler system installed in accordance with Section 903.3.1.1 and 903.3.1.2 of the International Building has been added, and the building is now sprinklered throughout, the required fire-resistance ratings of building elements and materials shall be permitted to meet the requirements of the current building code. The building is required to meet the other applicable fire protection requirements of Chapter 9 of the International Building Code.