**15-006-B**

**1. State Building Code to be Amended:**

 🗷 International Building Code [ ]  State Energy Code

 [ ]  ICC ANSI A117.1 Accessibility Code [ ]  International Mechanical Code

 [ ]  International Existing Building Code [ ]  International Fuel Gas Code

 [ ]  International Residential Code [ ]  NFPA 54 National Fuel Gas Code

 🗷 International Fire Code [ ]  NFPA 58 Liquefied Petroleum Gas Code

 [ ]  Uniform Plumbing Code [ ]  Wildland Urban Interface Code

 **Section(s): 903.2.3**

 **Title: Group E daycare sprinklers**

**2. Proponent Name (Specific local government, organization or individual):**

**Proponents: Washington Association of Building Officials Technical Code Development Committee and Office of the State Fire Marshal.**

 **Title: N/A**

 **Date: April 16, 2015**

**3. Designated Contact Person:**

 **Name: Lee Kranz or Barbara McMullen (SFMO)**

 **Title: Plan Review Supervisor**

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**4. Proposed Code Amendment**. Reproduce the section to be amended by underlining all added language, striking through all deleted language. Insert new sections in the appropriate place in the code in order to continue the established numbering system of the code. If more than one section is proposed for amendment or more than one page is needed for reproducing the affected section of the code additional pages may be attached. (Examples on the SBCC [website](https://fortress.wa.gov/ga/apps/sbcc/Page.aspx?nid=191))

 **Code(s)** IFC & IBC **Section(s)** 903.2.3

 Enforceable code language must be used; see an example [by clicking here](https://fortress.wa.gov/ga/apps/SBCC/File.ashx?cid=1803).

 Amend section to read as follows:

**903.2.3 Group E.** An automatic sprinkler system shall be provided for Group E fire areas.

EXCEPTIONS:

1. *Portable school classrooms* with an occupant load of 50 or less calculated in accordance with Table 1004.1.2, provided that the aggregate area of any cluster of portable classrooms does not exceed 6,000 square feet (557 m2); and clusters of portable school classrooms shall be separated as required by the building code; or
2. *Portable school classrooms* with an occupant load from 51through 98, calculated in accordance with Table 1004.1.2, and provided with two means of direct independent exterior egress from each classroom in accordance with Chapter 10, and one exit from each classroom shall be accessible, provided that the aggregate area of any cluster of portable classrooms does not exceed 6000 square feet (557 m2) , and clusters of *portable school classrooms* shall be separated as required by the building code; or
3. An automatic sprinkler system is not required in Group E occupancies with an occupant load of 50 or less within the Group E occupancy, calculated in accordance with Table 1004.1.2.
4. An automatic sprinkler system is not required in Group E day care and preschool facilities with an occupant load of 100 or less, and located at the level of exit discharge, and every room in which care is provided has not fewer than one exterior exit door.

1. **Briefly explain your proposed amendment, including the purpose, benefits and problems addressed.** Specifically note any impacts or benefits to business, and specify construction types, industries and services that would be affected. Finally, please note any potential impact on enforcement such as special reporting requirements or additional inspections required.

**Reason statement**

The modifications to the original proposal 15-006 are being suggested after discussing this code issue and collaborating with representatives of the State Fire Marshal’s office. Exception #3 has been modified to exclude daycare and preschool occupancies which are now addressed exceptions #4 & #5. It also clarifies that the floor area used to determine the occupant load for a Group E occupancy falls within the area of the Group E occupancy only and does not include adjoining areas, as would be the case if “fire area” were included in the code text. Since daycare and preschool occupancies are excluded from exception #3, the exception will only apply to other types of Group E occupancies.

Sprinkler protection thresholds for daycare and preschool occupancies are proposed to be addressed with new exceptions #4 and #5. Exception #4 is consistent with exception #2 of IBC Section 903.2.6 for Group I-4 occupancies and creates equity with the sprinkler threshold for an I-4 occupancy. Exception #5 is based on allowable “fire area” only for daycare and preschool occupancies and eliminates the previous confusion related to the inclusion of the occupant load threshold. 3,000 square feet equates to approximately 86 people when using the daycare occupant load factor of 35, which is still significantly less than 12,000 square feet allowed in the un-amended IBC (which would be 342 people).

1. **Specify what criteria this proposal meets.** You may select more than one.

[ ]  The amendment is needed to address a critical life/safety need.

[x]  The amendment is needed to address a specific state policy or statute.

[ ]  The amendment is needed for consistency with state or federal regulations.

[ ]  The amendment is needed to address a unique character of the state.

[x]  The amendment corrects errors and omissions.

1. **Is there an economic impact:** [x]  Yes     [ ]  No

Explain:

If there is an economic impact, use the Table below to estimate the costs and savings of the proposal on construction practices, users and/or the public, the enforcement community, and operation and maintenance. If preferred, you may submit an alternate cost benefit analysis.

**Alternate cost benefit analysis.**

To require 2 hour fire barriers or sprinkler protection throughout all buildings containing Group E daycare occupancies will add significant cost to small business. Many spaces in mixed use buildings that would otherwise be functional for small daycare operations would not be able to be used due to the additional cost to install fire barriers or sprinkler systems. The cost to install a new sprinkler system in an existing building varies widely but would be approximately $3 per SF. This does not include the cost related to business interruption due to installation of such as system. Adding the need to install new underground water supply will significantly add to the overall cost of compliance.

Fire barriers cost approximately $8.50 per SF and may be more due to interruption of adjacent established businesses. Loss of rent revenue from vacant tenant spaces due to excessive construction costs would also be significant.

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| Building Type | Construction[[1]](#footnote-1) | Enforcement[[2]](#footnote-2) | Operations & Maintenance[[3]](#footnote-3) |
| Costs | Benefits[[4]](#footnote-4) | Costs | Benefits4 | Costs | Benefits4 |
| Residential |  |  |  |  |  |  |
|  Single family |  |  |  |  |  |  |
|  Multi-family |  |  |  |  |  |  |
| Commercial/Retail |  |  |  |  |  |  |
| Industrial |  |  |  |  |  |  |
| Institutional |  |  |  |  |  |  |

Please send your completed proposal to: sbcc@ga.wa.gov

All questions must be answered to be considered complete. Incomplete proposals will not be accepted.

1. $ / square foot of floor area or other cost. Attach data. **Construction** costs are costs prior to occupancy, and include both design and direct construction costs

that impact the total cost of the construction to the owner/consumer. [↑](#footnote-ref-1)
2. Cost per project plan. Attach data. **Enforcement** costs include governmental review of plans, field inspection, and other action required for enforcement. [↑](#footnote-ref-2)
3. Cost to building owner/tenants over the life of the project. [↑](#footnote-ref-3)
4. Measurable benefit. [↑](#footnote-ref-4)