

IEBC



## 2015 GROUP A PUBLIC COMMENT AGENDA

SEPTEMBER 30 – OCTOBER 5, 2015  
LONG BEACH CONVENTION CENTER  
LONG BEACH, CA

*First Printing*

Publication Date: August 2015

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by

International Code Council, Inc.

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# EB1-15

[A] 101.4.2, 301.1.1, 301.1.3, 301.1.2, 1301.2, 1401.3.2

## Proposed Change as Submitted

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

### 2015 International Existing Building Code

Revise as follows:

**[A] 101.4.2 Buildings previously occupied.** The legal occupancy of any building existing on the date of adoption of this code shall be permitted to continue without change, except as is specifically covered in this code, the retroactive and maintenance provisions of the *International Fire Code*, or the *International Property Maintenance Code*, or as is deemed necessary by the code official for the general safety and welfare of the occupants and the public.

**301.1.1 Prescriptive compliance method.** *Repairs, alterations, additions and changes of occupancy* complying with Chapter 4 of this code ~~in buildings~~ , and complying with the retroactive and maintenance provisions of the *International Fire Code* shall be considered in compliance with the provisions of this code.

**301.1.3 Performance compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with Chapter 14 of this code , and complying with the retroactive and maintenance provisions of the *International Fire Code* shall be considered in compliance with the provisions of this code.

**301.1.2 Work area compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with the applicable requirements of Chapters 5 through 13 of this code, and complying with the retroactive and maintenance provisions of the *International Fire Code* shall be considered in compliance with the provisions of this code.

**1301.2 Conformance.** The building shall be safe for human occupancy as determined by the retroactive and maintenance provisions of the *International Fire Code* and the *International Property Maintenance Code*. Any *repair, alteration, or change of occupancy* undertaken within the moved structure shall comply with the requirements of this code applicable to the work being performed. Any field-fabricated elements shall comply with the requirements of the *International Building Code* or the *International Residential Code* as applicable.

**1401.3.2 Compliance with other codes.** Buildings that are evaluated in accordance with this section shall comply with the retroactive and maintenance provisions of the *International Fire Code* and *International Property Maintenance Code*.

**Reason:** This proposal is intended to clarify the intended scope of the reference to the IFC. The IFC has many roles that address new construction, retroactive construction requirements, maintenance and operational requirements. The sections addressed in this proposal are believed to focus primarily on provisions related to maintenance and retroactive provisions minimally. The IEBC itself will address what is intended to be addressed as far as further construction provisions. This is really meant as a clarification. A reference to the IFC in general should lead users to Chapter 1 which would, in Section 102 should explain how the reference is intended to be applied but this is sometimes misinterpreted.

Currently, the general reference to the IFC as in Section 1401.3.2 is sometimes interpreted as meaning the entire fire code thus negating the scoring methods benefits. Compliance in full with the new construction requirements of IFC Chapters 9 and 10 would require most aspects of fire protection and egress to be upgraded regardless of the score the current building would obtain. This was not the intent of the reference to the IFC.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

This proposal will not increase the cost of construction as these revisions will simply clarify that the IEBC was only intended to reference the IFC for retroactive and maintenance provisions. Therefore the level of applicability of the IFC will not change.

EB1-15 : [A] 101.4.2-  
KULIK4744

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### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** This proposal was disapproved based upon concern that not all states reference the IFC. This additional language does not clarify to what level you must comply with the IFC and provides unnecessary language.

**Assembly Motion:**

**As Submitted**

**Online Vote Results:**

**Successful**

Support: 50.91% (84) Oppose: 49.09% (81)

**Assembly Action :**

**Approved as Submitted**

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### **Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : Assembly Action**

**requests Approve as Submitted.**

**Commenter's Reason:** This code change proposal is on the agenda for individual consideration because the proposal received a successful assembly action. The

assembly action for Approve as Submitted was successful by a vote of 50.91% (84) to 49.09% (81) by eligible members online during the period of May 14 - May 28, 2015.

## *Public Comment 2:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**[A] 101.4.2 Buildings previously occupied.** The legal occupancy of any building existing on the date of adoption of this code shall be permitted to continue without change, except as is specifically covered in this code, the ~~retroactive and maintenance~~ provisions of the *International Fire Code* applicable to existing buildings, or the *International Property Maintenance Code*, or as is deemed necessary by the *code official* for the general safety and welfare of the occupants and the public.

**301.1.1 Prescriptive compliance method.** *Repairs, alterations, additions and changes of occupancy* complying with Chapter 4 of this code, and complying with the ~~retroactive and maintenance~~ provisions of the *International Fire Code* applicable to existing buildings shall be considered in compliance with the provisions of this code.

**301.1.2 Work area compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with the applicable requirements of Chapters 5 through 13 of this code, ~~and complying with the retroactive and maintenance provisions of the International Fire Code~~ shall be considered in compliance with the provisions of this code.

**301.1.3 Performance compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with Chapter 14 of this code, and complying with the ~~retroactive and maintenance~~ provisions of the *International Fire Code* applicable to existing buildings shall be considered in compliance with the provisions of this code.

**1301.2 Conformance.** The building shall be safe for human occupancy as determined by the ~~retroactive and maintenance~~ provisions of the *International Fire Code* applicable to existing buildings and the *International Property Maintenance Code*. Any *repair, alteration, or change of occupancy* undertaken within the moved structure shall comply with the requirements of this code applicable to the work being performed. Any field-fabricated elements shall comply with the requirements of the *International Building Code* or the *International Residential Code* as applicable.

**1401.3.2 Compliance with other codes.** Buildings that are evaluated in accordance with this section shall comply with the ~~retroactive and maintenance~~ provisions of the *International Fire Code* applicable to existing buildings and *International Property Maintenance Code*.

**Commenter's Reason:** This original proposal is really meant as a clarification. A reference to the IFC in general should lead users to Chapter 1 which would, in

Section 102 should explain how the reference is intended to be applied but this is sometimes misinterpreted. This proposal is important in that it carves out the applicable provisions that this reference intends.

Currently, the general reference to the IFC as in Section 1401.3.2 is sometimes interpreted as meaning the entire fire code thus negating the scoring methods benefits. Compliance in full with the new construction requirements of IFC Chapters 9 and 10 would require most aspects of fire protection and egress to be upgraded regardless of the score the current building would obtain. This was not the intent of the reference to the IFC.

The other aspect of the need for this reference is that often the retroactive requirements of the IFC are overlooked. Having a specific emphasis on the existing building provisions of the IFC will help clarify the need to comply with these minimum construction requirements in Chapter 11 and to a certain extent Chapter 8.

The committee was concerned with the terms used of "retroactive and maintenance provisions" as being misleading as to which requirements were intended. Instead the public comments make this a more universal reference to the provisions of the IFC that apply to existing buildings. Section 102 of the IFC provides specific guidance as to the applicability to existing buildings.

Another concern by the committee was that not all jurisdictions use Chapter 11 of the IFC. With a more general reference to "provisions applicable to existing buildings" applicability can be determined based upon their particular adopted regulations.

Section 301.1.2 was reverted back to the 2015 language which did not have a current reference to the IFC. This is related to the understanding of the original intent of the work area method which was intended to be all inclusive. In other words, when applying the work area method a reference to the IFC was specifically not included for this reason.

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**EB1-15**

## EB2-15

[A] 104.2.1, 302.3, 401.2.1, 401.3, [BS] 404.2.1, 407.1, 407.1.1, 408.2, [BS] A106.2, [BS] A107.1, [BS] A108.1, [BS] A113.7, [BS] A206.2, [BS] A505.1

### Proposed Change as Submitted

**Proponent :** Maureen Traxler, City of Seattle, representing City of Seattle Dept of Planning & Development  
(maureen.traxler@seattle.gov)

## 2015 International Existing Building Code

Revise as follows:

**[A] 104.2.1 Determination of substantially improved or substantially damaged existing buildings and structures in flood hazard areas.** For applications for reconstruction, rehabilitation, repair, alteration, addition or other improvement of existing buildings or structures located in flood hazard areas, the building official shall determine where the proposed work constitutes substantial improvement or repair of substantial damage. Where the building official determines that the proposed work constitutes substantial improvement or repair of substantial damage, and where required by this code, the ~~building code~~ official shall require the building to meet the requirements of Section 1612 of the *International Building Code*.

**302.3 Existing materials.** Materials already in use in a building in compliance with requirements or approvals in effect at the time of their erection or installation shall be permitted to remain in use unless determined by the ~~building code~~ official to be unsafe.

**401.2.1 Existing materials.** Materials already in use in a building in compliance with requirements or approvals in effect at the time of their erection or installation shall be permitted to remain in use unless determined by the ~~building code~~ official to be unsafe per Section 115.

**401.3 Dangerous conditions.** The ~~building code~~ official shall have the authority to require the elimination of conditions deemed *dangerous*.

**[BS] 404.2.1 Evaluation.** The building shall be evaluated by a *registered design professional*, and the evaluation findings shall be submitted to the ~~building official~~code official. The evaluation shall establish whether the damaged building, if repaired to its predamage state, would comply with the provisions of the *International Building Code* for wind and earthquake loads.

Wind loads for this evaluation shall be those prescribed in Section 1609 of the *International Building Code*. Earthquake loads for this evaluation, if required, shall be permitted to be 75 percent of those prescribed in Section 1613 of the *International Building Code*. Alternatively, compliance with ASCE 41, using the performance objective in Table 301.1.4.2 for the applicable risk category, shall be deemed to meet the earthquake evaluation requirement.

**407.1 Conformance.** No change shall be made in the use or occupancy of any building unless such building is made to comply with the requirements

of the *International Building Code* for the use or occupancy. Changes in use or occupancy in a building or portion thereof shall be such that the existing building is no less complying with the provisions of this code than the existing building or structure was prior to the change. Subject to the approval of the ~~building code~~ official, the use or occupancy of *existing buildings* shall be permitted to be changed and the building is allowed to be occupied for purposes in other groups without conforming to all of the requirements of this code for those groups, provided the new or proposed use is less hazardous, based on life and fire risk, than the existing use.

**Exception:** The building need not be made to comply with the seismic requirements for a new structure unless required by Section 407.4.

**407.1.1 Change in the character of use.** A change in occupancy with no change of occupancy classification shall not be made to any structure that will subject the structure to any special provisions of the applicable *International Codes*, without approval of the ~~building official~~ code official. Compliance shall be only as necessary to meet the specific provisions and is not intended to require the entire building be brought into compliance.

**408.2 Life safety hazards.** The provisions of this code shall apply to historic buildings judged by the ~~building code~~ official to constitute a distinct life safety hazard.

**[BS] A106.2 Existing materials.** Existing materials used as part of the required vertical load-carrying or lateral forceresisting system shall be in sound condition, or shall be repaired or removed and replaced with new materials. All other unreinforced masonry materials shall comply with the following requirements:

1. The lay-up of the masonry units shall comply with Section A106.3.2, and the quality of bond between the units has been verified to the satisfaction of the building official;
2. Concrete masonry units are verified to be load-bearing units complying with ASTM C 90 or such other standard as is acceptable to the ~~building code~~ official; and
3. The compressive strength of plain concrete walls shall be determined based on cores taken from each class of concrete wall. The location and number of tests shall be the same as those prescribed for tensile-splitting strength tests in Sections A106.3.3.3 and A106.3.3.4, or in Section A108.1.

The use of materials not specified herein or in Section A108.1 shall be based on substantiating research data or engineering judgment, with the approval of the ~~building~~ code official.

**[BS] A107.1 Pointing.** Preparation and mortar pointing shall be performed with special inspection.

**Exception:** At the discretion of the ~~building code~~ official, incidental pointing may be performed without special inspection.

**[BS] A108.1 Values.**

1. Strength values for existing materials are given in Table A1-D and



- for new materials in Table A1-E.
2. Capacity reduction factors need not be used.
  3. The use of new materials not specified herein shall be based on substantiating research data or engineering judgment, with the approval of the ~~building code~~ official.

### **[BS] A113.7 Veneer.**

1. Veneer shall be anchored with approved anchor ties conforming to the required design capacity specified in the building code and shall be placed at a maximum spacing of 24 inches (610 mm) with a maximum supported area of 4 square feet (0.372 m<sup>2</sup>).

**Exception:** Existing anchor ties for attaching brick veneer to brick backing may be acceptable, provided the ties are in good condition and conform to the following minimum size and material requirements.

Existing veneer anchor ties may be considered adequate if they are of corrugated galvanized iron strips not less than 1 inch (25 mm) in width, 8 inches (203 mm) in length and  $\frac{1}{16}$  inch (1.6 mm) in thickness, or the equivalent.

2. The location and condition of existing veneer anchor ties shall be verified as follows:
  - 2.1. An approved testing laboratory shall verify the location and spacing of the ties and shall submit a report to the ~~building code~~ official for approval as part of the structural analysis.
  - 2.2. The veneer in a selected area shall be removed to expose a representative sample of ties (not less than four) for inspection by the ~~building code~~ official.

### **[BS] A206.2 Special requirements for wall anchorage**

**systems.** The steel elements of the wall anchorage system shall be designed in accordance with the building code without the use of the 1.33 short duration allowable stress increase when using allowable stress design.

Wall anchors shall be provided to resist out-of-plane forces, independent of existing shear anchors.

**Exception:** Existing cast-in-place shear anchors are allowed to be used as wall anchors if the tie element can be readily attached to the anchors, and if the engineer or architect can establish tension values for the existing anchors through the use of approved as-built plans or testing and through analysis showing that the bolts are capable of resisting the total shear load (including dead load) while being acted upon by the maximum tension force due to an earthquake. Criteria for analysis and testing shall be determined by the ~~building code~~ official.

Expansion anchors are only allowed with special inspection and approved testing for seismic loading.

Attaching the edge of plywood sheathing to steel ledgers is not considered compliant with the positive anchoring requirements of this chapter. Attaching the edge of steel decks to steel ledgers is not considered as providing the positive anchorage of this chapter unless testing and/or analysis are performed to establish shear values for the attachment

perpendicular to the edge of the deck. Where steel decking is used as a wall anchor system, the existing connections shall be subject to field verification and the new connections shall be subject to special inspection.

**[BS] A505.1 General.** Structures conforming to the requirements of the ASCE 41 Chapter 4, Screening Phase, are permitted to be shown to be in conformance to this chapter by submission of a report to the ~~building-code~~ official, as described in this section.

**Reason:** The IEBC defines the term "code official" but it then uses both "building official" and "code official." Both terms are used in other International codes, but none of the codes uses both. "Code official" is more appropriate for the IEBC because the IEBC addresses more than Building Code issues. It includes mechanical sections—the IMC uses the term "code official." It includes plumbing sections—the IPC uses the term "code official." The term "code official" is defined in Chapter 2, and is the more general term.

Note that Figure A3-1 and A3-2 also contain the term "building official" and should also be revised to "code official." The figures could not be added to the proposal.

**Cost Impact:** Will not increase the cost of construction  
This is an editorial change that will not affect the cost of construction.

EB2-15 : 302.3-  
TRAXLER3299

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** There was concern that a reference to other than the "building official" would cause confusion. A building official is the most appropriate enforcement entity for an existing building code.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Committee, National Council of Structural Engineers Associations (dbonowitz@att.net) requests Approve as Submitted.**

**Commenter's Reason:** The committee's reason for disapproval -- that "building official" is a better and less confusing term than "code official" -- is simply false. In fact, code official is the more common term in the IEBC, and NOT to clean up the few remnant uses of building official is more confusing. Consider:

1. The IEBC and IBC use the term "code official" right in the first line of the Introduction to each code. This is hardly a non-standard term.
2. The IEBC defines only Code Official, with essentially the same definition as the IBC's Building Official.
3. The IEBC already uses "code official" throughout. EB 2 would merely clean up the relatively few remaining uses of "building official," especially in Chapter 4 where they are left over from borrowing text from IBC Chapter 34 that no longer exists there.

## *Public Comment 2:*

**Proponent : Kathleen Petrie, representing City of Seattle, Department of Planning and Development (kathleen.petrie@seattle.gov) requests Approve as Submitted.**

**Commenter's Reason:** "Code Official", not "Building Official", is the defined term in the IEBC, IECC, and IMC. The term "Code Official" is used 174 times throughout the IEBC; "Building Official" is currently only used 22 times. Additional preference is demonstrated in Section 104 entitled "Duties and Powers of Code Official" where the first sentence states: "The *code official* is hereby authorized and directed to enforce the provisions of this code."

Contrary to the message at the Committee Action Hearings, "Building Official" actually causes more confusion because it is not the primary term in the IEBC, so this and future proposals should work to replace the few remaining "Building Official" terms to "Code Official".

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**EB2-15**

# EB5-15

## 301.1

### **Proposed Change as Submitted**

**Proponent :** David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Subcommittee, National Council of Structural Engineers Associations (dbonowitz@att.net)

## **2015 International Existing Building Code**

### **Revise as follows:**

**301.1 General.** The *repair, alteration, change of occupancy, addition* or relocation of all *existing buildings* shall comply with one of the methods listed in Sections 301.1.1 through 301.1.3 as selected by the applicant. Sections 301.1.1 through 301.1.3 shall not be applied in combination with each other. Where this code requires consideration of the seismic force-resisting system of an *existing building* subject to *repair, alteration, change of occupancy, addition* or relocation of *existing buildings*, the seismic evaluation and design shall be based on Section 301.1.4 regardless of which compliance method is used.

**Exception:** Other than in flood hazard areas or regarding structural provisions, and Subject to the approval of the *code official*, alterations complying with the laws in existence at the time the building or the affected portion of the building was built shall be considered in compliance with the provisions of this code ~~unless the building is undergoing more than a limited structural alteration as defined in Section 907.4.4. New structural members added as part of the alteration shall comply with the International Building Code. Alterations of existing buildings in flood hazard areas shall comply with Section 701.3.~~

**Reason:** This proposal retains the exception that allows the code official to waive certain architectural and other requirements that the IEBC would normally trigger in alteration projects. It removes that exception, however, regarding structural provisions that would have been triggered by alterations.

The current exception already does not apply to alterations in flood hazard areas (which sometimes trigger structural improvements) or to substantial structural alterations. So the proposal does not change those cases at all.

The proposal eliminates the potential that the IEBC's basic structural requirements might be undermined by a code official's discretion, or, more likely, by a permit applicant who reads this exception as a way to demand a discretionary waiver. Since very few code officials would be comfortable waiving these structural safety provisions, the proposal actually helps them enforce the code as intended.

Further, the existing exception is unclear. It refers to "laws in existence at the time the building ... was built." But if the intent is to waive requirements triggered by alterations, this language ignores, or forgets, the fact that older codes for a long time had alteration provisions that triggered structural upgrade -- often with requirements more onerous than those in the current IEBC. So does a permit applicant claiming compliance with the "laws in existence" a generation ago also intend to comply with those outdated triggers? This proposal removes that potential confusion.

Since the existing structural provisions for alterations are already measured, already allow reduced loads and alternative criteria in many cases, and already trigger

structural improvements only in rare and severe cases, the proposed change to this exception should have little impact except to affirm that structural safety is fundamental to the code's intent.

**Cost Impact:** Will not increase the cost of construction

This proposal will not increase the cost of construction, but it could, hypothetically, limit the cases in which the code official could effectively reduce the cost of construction by waiving structural safety requirements. In practice, no increase in the cost of construction should be expected, however, since the proposal does not change any of the code's provisions, but only changes what was a discretionary waiver.

EB5-15 : 301.1 -  
BONOWITZ5196

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The proposal was disapproved as it will create more confusion in the application of the exception. There were suggestions that a different format was needed.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Committee, National Council of Structural Engineers Associations (dbonowitz@att.net) requests Approve as Modified by this Public Comment.**

**Replace Proposal as Follows:**

### **2015 International Existing Building Code**

**301.1 General.** The *repair, alteration, change of occupancy, addition or relocation of all existing buildings* shall comply with one of the methods listed in Sections 301.1.1 through 301.1.3 as selected by the applicant. Sections 301.1.1 through 301.1.3 shall not be applied in combination with each other. Where this code requires consideration of the seismic force-resisting system of an *existing building* subject to *repair, alteration, change of occupancy, addition or relocation of existing buildings*, the seismic evaluation and design shall be based on Section 301.1.4 regardless of which compliance method is used.

**Exception:** Subject to the approval of the *code official*, alterations complying with the laws in existence at the time the building or the affected portion of the building was built shall be considered in compliance with the provisions of this code ~~unless the building is undergoing more than a limited structural alteration as defined in Section 907.4.4.~~ New structural members added as part of the

alteration shall comply with the International Building Code. Alterations of existing buildings. This exception shall not apply to alterations that constitute substantial improvement in flood hazard areas, which shall comply with Section 701.3. This exception shall not apply to the structural provisions of Chapter 4 or to the structural provisions of Sections 707, 807, and 907.

**Commenter's Reason:** This comment responds to the committee's suggestion, in its reason statement, that a clearer presentation of the idea is needed. In fact, the proposal we submitted to ICC had that clearer presentation, but it was modified by ICC and by CDPaccess, making the proposal, which is rather simple, much harder to follow. NONE OF THE COMMITTEE MEMBERS VOICED OPPOSITION TO THE MAIN SUBSTANTIVE IDEA OF THE PROPOSAL, in point 3 below.

This public comment restores the basic proposal in an easier-to-follow format -- though it must be said that CDPaccess STILL MAKES IT UNNECESSARILY CONFUSING!

Here is the idea (really, it's so simple):

1. There's a discretionary exception to 301.1 for certain alterations. Proposal EB5 and this comment keep that exception as is. No problem.
2. The exception already does not apply to substantial improvements in flood hazard areas. Proposal EB5 and this comment keep that limitation as is, but add a few words to clarify that the limit is only for substantial improvements. No substantive change, so no problem.
3. The exception already does not apply to any structural alteration that is "more than a limited structural alteration." Proposal EB5 and this comment merely extend that limit to other structural work. The reason, as given in the original reason statement for EB5, is that the IEBC structural provisions for alteration projects are already quite measured, already allow reduced loads and alternative criteria in most cases, and already trigger structural improvements only in rare and severe cases. Thus, EB5 should have little impact except to affirm that structural safety is fundamental to the IEBC's intent. (By making this change, EB5 also solves some implementation problems and confusion inherent in the existing exception; see the original EB5 reason statement for details.)

Again, at the hearings, the ONLY concerns expressed by the committee were about the confusing nature of the EXISTING exception, and whether proposal EB5 could be written in a clearer way.

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EB5-15

# EB8-15

**301.1, [BS] 301.1.4, [BS] 301.1.4.1, [BS] Table 301.1.1.4.1, [BS] 301.1.4.2, [BS] Table 301.1.1.4.2, 303 (New)**

## **Proposed Change as Submitted**

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee(bcac@iccsafe.org)

## **2015 International Existing Building Code**

**Revise as follows:**

### **SECTION 301 ADMINISTRATION**

**301.1 General.** The *repair, alteration, change of occupancy, addition* or relocation of all *existing buildings* shall comply with one of the methods listed in Sections 301.1.1 through 301.1.3 as selected by the applicant. Sections 301.1.1 through 301.1.3 shall not be applied in combination with each other. Where this code requires consideration of the seismic forceresisting system of an *existing building* subject to *repair, alteration, change of occupancy, addition* or relocation of *existing buildings*, the seismic evaluation and design shall be based on Section ~~301.1.4~~ 303.1 regardless of which compliance method is used.

**Exception:** Subject to the approval of the *code official*, *alterations* complying with the laws in existence at the time the building or the affected portion of the building was built shall be considered in compliance with the provisions of this code unless the building is undergoing more than a limited structural *alteration* as defined in Section 907.4.4. New structural members added as part of the *alteration* shall comply with the *International BuildingCode*. *Alterations of existing buildings in flood hazardareas* shall comply with Section 701.3.

**301.1.1 Prescriptive compliance method.** *Repairs, alterations, additions* and *changes of occupancy* complying with Chapter 4 of this code in buildings complying with the *International Fire Code* shall be considered in compliance with the provisions of this code.

**301.1.2 Work area compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with the *applicable requirements of Chapters 5 through 13* of this code shall be considered in compliance with the provisions of this code.

**301.1.3 Performance compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with Chapter 14 of this code shall be considered in compliance with the provisions of this code.

**Add new section as follows:**

## **SECTION 303 SEISMIC EVALUATION AND DESIGN PROCEDURES**

**Renumber subsequent sections:**

**[BS] ~~301.1.4~~ 303.1 Seismic evaluation and design procedures General.** *(No change to text)*

**[BS] ~~301.1.4.1~~ 303.1.1 Compliance with International Building Code-level seismic forces.** *(No change to text)*

**TABLE [BS] ~~301.1.4.1~~ 303.1.1  
PERFORMANCE OBJECTIVES FOR USE IN ASCE 41 FOR COMPLIANCE  
WITH INTERNATIONAL BUILDING CODE-LEVEL SEISMIC FORCES**  
*(No change to Table)*

**[BS] ~~301.1.4.2~~ 303.1.2 Compliance with reduced International Building Code-level seismic forces.** *(No change to text)*

**TABLE [BS] ~~301.1.4.2~~ 303.1.2  
PERFORMANCE OBJECTIVES FOR USE IN ASCE 41 FOR  
COMPLIANCE WITH REDUCED INTERNATIONAL BUILDING CODE-  
LEVEL SEISMIC FORCES**  
*(No change to Table)*

**Reason:** The code change proposal is to move the seismic evaluation and design procedures out of the same section and code hierarchy as the three compliance methods and places it in its own section. With the location of the seismic evaluation and design procedure reference in 301.1, it can potentially confuse the code user since two items need to happen in the current 301; choose a method and do a seismic evaluation.

Since the topic is separate and distinct, the proposal moves it to a separate section to ensure it is independent of the compliance method choice by the applicant.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

Cost impact: Code proposal is only to clarify the existing code requirements through a relocation (reorganization) of code sections, so there is no intended increase or decrease expected by approving this proposal.

**EB8-15 : 301.1-  
KULIK4888**

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### **Public Hearing Results**

**Committee Action:**

**Approved as Submitted**

**Committee Reason:** This proposal was approved as the format of the chapter will be clearer. Section 301 is intended to describe the three compliance methods. The seismic criteria are to be applied to all three methods where referenced and need to be located in a standalone section.



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**Individual Consideration Agenda****Public Comment 1:**

**Proponent : David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Committee, National Council of Structural Engineers Associations (dbonowitz@att.net) requests Approve as Modified by this Public Comment.**

**Modify as Follows:****2015 International Existing Building Code**

**301.1 General.** The *repair, alteration, change of occupancy, addition* or relocation of all *existing buildings* shall comply with one of the methods listed in Sections 301.1.1 through 301.1.3 as selected by the applicant. Sections 301.1.1 through 301.1.3 shall not be applied in combination with each other. ~~Where this code requires consideration of the seismic force-resisting system of an existing building subject to repair, alteration, change of occupancy, addition or relocation of existing buildings, the seismic evaluation and design shall be based on Section 303.1 regardless of which compliance method is used.~~

**Exception:** Subject to the approval of the *code official*, alterations complying with the laws in existence at the time the building or the affected portion of the building was built shall be considered in compliance with the provisions of this code unless the building is undergoing more than a limited structural *alteration* as defined in Section 907.4.4. New structural members added as part of the *alteration* shall comply with the *International Building Code*. *Alterations of existing buildings in flood hazard areas* shall comply with Section 701.3.

**303.1 General** Where required, seismic evaluation or design shall be based on the procedures and criteria in this section, regardless of which compliance method is used.

~~**[BS] 303.1 General.** The seismic evaluation and design shall be based on the procedures specified in the *International Building Code* or ASCE 41. The procedures contained in Appendix A of this code shall be permitted to be used as specified in Section 303.1.2.~~

**Commenter's Reason:** The basic idea of EB 8 is good, and we support it: For clarity and usability, move the seismic criteria from section 301.1.4 into their own new section 303. However, in doing so, EB 8 missed two important cleanups to go with the move. This comment completes the intent of EB 8:

1. Move the last sentence of 301.1 into the new section 303 where it belongs, just before the seismic criteria sections themselves. With the move, the sentence can also be editorially simplified, clarified, and corrected as shown. This move is also important because it removes the confusion about whether the exception to 301.1 applies to the seismic criteria -- it obviously does not, as was pointed out at the hearings by several committee members, and as any quick read will show. If there is any doubt remaining about whether this sentence is meant to go with the seismic criteria and is not subject to the exception, we point out that the sentence was first added to the IEBC -- without any exception -- in 2009, when it and the seismic criteria

were still in section 101.5. Only in 2012 were both the sentence and the criteria moved into section 301.

2. By moving this sentence into new 303.1, replace the now redundant language of current 301.1.4 (new 303.1). This language is redundant because it merely names the documents that are going to be named and specified in greater detail in the sections to come (new 303.1.1 and 303.1.2).

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**EB8-15**

# EB9-15

301.1, 301.1.1, Chapter 4, 1401.2.5, [BS] B101.3, [BS] B101.4

## Proposed Change as Submitted

**Proponent :** David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Subcommittee, National Council of Structural Engineers Associations (dbonowitz@att.net)

### 2015 International Existing Building Code

**Delete without substitution:**

~~CHAPTER 4 PRESCRIPTIVE COMPLIANCE METHOD~~

*(Delete entire chapter)*

*(Renumber subsequent chapters)*

**Revise as follows:**

**301.1 General.** The *repair, alteration, change of occupancy, addition* or relocation of all *existing buildings* shall comply with one of the methods listed in Sections 301.1.1 ~~through 301.1.3~~ or 301.1.2 as selected by the applicant. Sections 301.1.1 ~~through 301.1.3~~ and 301.1.2 shall not be applied in combination with each other. Where this code requires consideration of the seismic forceresisting system of an *existing building* subject to *repair, alteration, change of occupancy, addition* or relocation of *existing buildings*, the seismic evaluation and design shall be based on Section 301.1.4 regardless of which compliance method is used.

**Exception:** Subject to the approval of the *code official*, *alterations* complying with the laws in existence at the time the building or the affected portion of the building was built shall be considered in compliance with the provisions of this code unless the building is undergoing more than a limited structural *alteration* as defined in Section 907.4.4. New structural members added as part of the *alteration* shall comply with the *International BuildingCode*. *Alterations of existing buildings in flood hazardareas* shall comply with Section 701.3.

**Delete without substitution:**

~~**301.1.1 Prescriptive compliance method.** *Repairs, alterations, additions and changes of occupancy* complying with Chapter 4 of this code in buildings complying with the *International Fire Code* shall be considered in compliance with the provisions of this code.~~

**Revise as follows:**

~~**301.1.2**~~**301.1.1 Work area compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings* complying with the applicable requirements of Chapters 5 through 13 of this code shall be considered in compliance with the provisions of this code.

~~301.1.3~~ **301.1.2 Performance compliance method.** *Repairs, alterations, additions, changes in occupancy and relocated buildings complying with Chapter 14 of this code shall be considered in compliance with the provisions of this code.*

*(Renumber subsequent sections)*

**1401.2.5 Accessibility requirements.** Accessibility shall be provided in accordance with Section ~~410-605~~ 705.

**[BS] B101.3 Qualified historic buildings and facilities subject to Section 106 of the National Historic Preservation Act.** Where an *alteration or change of occupancy* is undertaken to a qualified *historic building* or facility that is subject to Section 106 of the National Historic Preservation Act, the federal agency with jurisdiction over the undertaking shall follow the Section 106 process. Where the state historic preservation officer or Advisory Council on Historic Preservation determines that compliance with the requirements for accessible routes, ramps, entrances, or toilet facilities would threaten or destroy the historic significance of the building or facility, the alternative requirements of Section ~~410.9-~~ 1204.1 for that element are permitted.

**[BS] B101.4 Qualified historic buildings and facilities not subject to Section 106 of the National Historic Preservation Act.** Where an *alteration or change of occupancy* is undertaken to a qualified *historic building* or facility that is not subject to Section 106 of the National Historic Preservation Act, and the entity undertaking the alterations believes that compliance with the requirements for accessible routes, ramps, entrances, or toilet facilities would threaten or destroy the historic significance of the building or facility, the entity shall consult with the state historic preservation officer. Where the state historic preservation officer determines that compliance with the accessibility requirements for accessible routes, ramps, entrances, or toilet facilities would threaten or destroy the historical significance of the building or facility, the alternative requirements of Section ~~410.9-~~ 1204.1 for that element are permitted.

**Reason:** The intent of this proposal is to consider removing the Prescriptive compliance method from the IEBC, leaving the Wbrk Area compliance method and the Performance compliance method in place.

Note: For purposes of brevity, the balance of Chapter 4 is not shown, but the intent is that Chapter 4 would be removed in its entirety, with corresponding changes to chapter and section numbers and related cross-referencing throughout the code.

The IEBC was created to implement the Wbrk Area method. For continuity purposes, the two methods already in IBC Chapter 34 -- the Prescriptive and Performance methods -- were added to the IEBC upon its initial publication over a decade ago. The idea was that having three broad options would aid transition to the new code. Since then, the IEBC has enjoyed wide adoption, the Wbrk Area method has become known and used, and revisions have been made to all three methods to reconcile many of the differences among them. Indeed, over the last three cycles, the structural provisions of the Prescriptive and Wbrk Area methods have been made nearly identical.

Meanwhile, and especially because the IBC now refers to the IEBC in lieu of its own Chapter 34, many are questioning why the IEBC still needs multiple methods. It makes implementation confusing, and it puts a burden on jurisdiction adoption committees, code officials, design professionals, and permit applicants to weigh the advantages and disadvantages of each method. In some cases it leads to gaming. Some jurisdictions have simply not adopted one or another method, to facilitate consistent enforcement. Unfortunately, some proposals to solve the problem of

multiple methods would link or cross-reference them, just to minimize duplication of text. While well-intentioned, this will only make using the IEBC more confusing and difficult (and will violate the intent of Section 301.1 that the methods should remain distinct and not used in a mix-and-match fashion). The better approach is to reconcile differences between the methods, and then eliminate the older, less accommodating Prescriptive method.

Perhaps the time for that is now. Perhaps it is time, after four code cycles, to reconsider the initial intent of the IEBC: To regulate work on existing buildings by project type, with nuances and considerations that require more than a single code chapter.

If the code's users, writers, and stakeholders agree that the Prescriptive and Work Area methods are by now sufficiently similar, we can eliminate the older Prescriptive method with little or no impact, using the public comment period and the time between now and 2018 to iron out the necessary editorial, administrative and coordination changes. If not -- that is, if there is even a significant minority in rational opposition -- then we can approve the proposal at the hearings, use the public comment period to identify irreconcilable differences, disapprove or withdraw the proposal if necessary as a final action, and work on reconciliation for the 2021 IEBC. At the very least, however, this proposal represents an opportunity to hear from the IEBC committee and the code's users about whether and when the Prescriptive method ought to be retired.

**Cost Impact:** Will not increase the cost of construction

If the Prescriptive Method and the Work Area Method are similar enough to justify approval of this proposal, then removal of the Prescriptive method cannot result in a significant cost increase.

EB9-15 : 301.1-  
BONOWITZ5264

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The prescriptive method was felt to be a viable option for many projects and would reduce the flexibility of the document if deleted. There was concern with how the deletion of Chapter 4 would integrate with the other major format changes being proposed in this cycle.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Committee, National Council of Structural Engineers Associations (dbonowitz@att.net) requests Approve as Submitted.**

**Commenter's Reason:** This Public Comment is intended to ensure that the idea of removing the Prescriptive method from the IEBC gets a full hearing from ICC members and users so as to better inform the ICC Board. Even if EB 9 is approved by members and desired by IEBC users, removal of Chapter 4 from the IEBC will surely require ICC Board approval -- just as ICC Board approval was needed in the last cycle when Chapter 34 was removed from the IBC. Thus, THERE IS NO DANGER

that in voting to approve EB 9 we will be prematurely pulling Chapter 4 from the IEBC. Rather, we will be telling the ICC Board that this is the direction to go in. If we can get there in this cycle, great. If not, let's put all of our fellow code wonks on notice to start working for that goal in 2021.

Please see the original full reason statement for EB 9, which explains the history of why the Prescriptive method was intended only as a transitional option, and why it is now time to embrace the Work Area method.

In addition, we respond to the IEBC committee's reasons for initial -- and NOT unanimous! -- disapproval.

The committee said that the Prescriptive method remains a viable option and provides flexibility. That might have been true in 2003, when few people had heard of the Work Area method, but that benefit is far smaller today. The IEBC is much more widely adopted and recognized today. Also, over the last several cycles, most differences between the two methods have been eliminated -- in many cases the methods now represent mere duplication. But worse than that, rather than provide "flexibility," the multiple methods create a burdensome game in which the permit applicant tries each method (and must pay design professionals to go through the exercise) to see which one is cheapest. It's a hassle for everyone. Some jurisdictions adopt only one method, either Prescriptive or Work Area, just to avoid this gaming, so there's no "flexibility" there. Those jurisdictions are telling us something about where the IEBC should be headed.

The committee also wondered how EB 9 would mesh with the other big re-organizing proposals, EB 10, 11, and 33. Good question, easy answer: It would make them unnecessary! The very reasons for those proposals are to eliminate duplication and (in the case of EB 11), to outright select the Work Area method over the Prescriptive method. It turns out that the easiest and most effective way to remove duplication from the IEBC and improve its usability is NOT to reorganize and rearrange the chapters (per EB 10, 11, and 33), but to just remove one of the multiple methods. EB 10, 11, and 33 are all half-measures. But whether you like them or not, it is clear that the committee and the members approve of their overall intent -- to remove duplication and improve usability. Those are precisely the intent and the effect of EB 9.

But there are other reasons to urge the ICC Board to commit to removing Chapter 4. Doing so, through EB 9 or other means, will also eliminate the confusion, the cross-referencing, the cycle by cycle changes to chapter and section numbers, the MISTAKES and OVERSIGHTS, and the general flips and twists made necessary by interim measures like EB 10, 11, and 33. It turns out that EB 10 and EB 11, despite their good intent, COMPLETELY MISSED the necessary coordination for historic buildings in Chapter 12. And it turns out that EB 33, though it claims to be entirely editorial, will actually result in unintended substantive changes to accessibility requirements. Yet all three were approved, because it's just really hard to simplify half of something and still have the other half work smoothly. Trying to do this piece by piece is bound to make mistakes and will ultimately make the code even harder to untangle.

By voting for EB 9, you can tell the ICC Board that it's time for the IEBC to live up to its mission. The Prescriptive method had a good run, but we're ready, finally, to move on to something better.

## *Public Comment 2:*

**Proponent : Steven McDaniel, representing New York State Building Officials Conference requests Approve as Submitted.**

**Commenter's Reason:** Chapter 4 of the IEBC was moved from IBC Chapter 34 (the Prescriptive and Performance methods). The IBC only had Chapter 34, however when it was moved to the IEBC it became two separate compliance methods (Chapter 4

and Chapter 14 of IEBC). These two chapters used to be linked together for compliance when they were in the IBC. In the IEBC, that link is no longer there. Chapter 4 contains provisions for project type but then also has separate provisions for Fire Escapes and Glass Replacement and Replacement Windows mixed in in the middle of the section.

The provisions in 402 for additions are found in Chapter 11. The provisions for Alterations in Chapter 4 send you to the Building Code for compliance with no guidance of what needs to be complied with. There are no provisions for the different classifications of levels of alterations. The more you read and try to apply the provisions found in Chapter 4, the more problems you encounter.

Chapter 14 is a valuable compliance method, however Chapter 4 is a messy "Go to the Building Code and be no less conforming" chapter that needs to be removed because the connection to Chapter 14 is no longer there.

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**EB9-15**

# EB11-15

**301.1, 301.2 (New), 301.1.2, 301.1.3, 301.3 (New), 401.1, 401.1.1, 409, Chapter 13, 1401.1**

## **Proposed Change as Submitted**

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

### **2015 International Existing Building Code**

**Relocate Chapter 13 as follows:**

#### **~~13~~ 14 RELOCATED OR MOVED BUILDINGS**

*(Renumber all subsequent sections in this chapter)*

*(Renumber Chapter 14 Prescriptive Method to be Chapter 13)*

#### **SECTION 301 ADMINISTRATION**

**301.1 General.** The *repair, alteration, change of occupancy, addition* or relocation of all *existing buildings* shall comply with ~~one 301.2 or 301.3~~ of the methods listed in Sections ~~301.1.1 through 301.1.3~~ as selected by the applicant. Sections ~~301.1.1 through 301.1.3~~ shall not be applied in combination with each other this section. Where this code requires consideration of the seismic ~~force~~resisting force resisting system of an *existing building* subject to *repair, alteration, change of occupancy, addition* or relocation of *existing buildings*, the seismic evaluation and design shall be based on Section ~~301.1.4~~ 301.2.4 regardless of which compliance method is used.

**Exception:** Subject to the approval of the *code official*, *alterations* complying with the laws in existence at the time the building or the affected portion of the building was built shall be considered in compliance with the provisions of this code unless the building is undergoing more than a limited structural *alteration* as defined in Section 907.4.4. New structural members added as part of the *alteration* shall comply with the *International Building Code*. *Alterations of existing buildings in flood hazard areas* shall comply with Section 701.3.

**Add new text as follows:**

**301.2 Repairs, alterations, change of occupancy, and additions.** The *repair, alteration, change of occupancy, or addition* of all *existing buildings* shall comply with one of the methods listed in Sections 301.1.1 through 301.1.3 as selected by the applicant. Sections 301.2.1 through 301.2.3 shall not be applied in combination with each other.

**Revise as follows:**

**~~301.1.1~~ 301.2.1 Prescriptive compliance method.** *Repairs, alterations, additions and changes of occupancy* complying with Chapter 4 of this code in buildings complying with the *International Fire Code* shall be



considered in compliance with the provisions of this code.

**~~301.1.2~~ 301.2.2 Work area compliance method.** *Repairs, alterations, additions, and changes in occupancy and relocated buildings complying with the applicable requirements of Chapters 5 through ~~13~~ 12 of this code shall be considered in compliance with the provisions of this code.*

**~~301.1.3~~ 301.2.3 Performance compliance method.** *Repairs, alterations, additions, and changes in occupancy and relocated buildings complying with Chapter ~~14~~ 13 of this code shall be considered in compliance with the provisions of this code.*

*(Renumber subsequent sections)*

**Add new text as follows:**

**301.3 Relocated Buildings** Relocated buildings shall comply with the requirements of Chapter 14.

**Revise as follows:**

**401.1 Scope.** The provisions of this chapter shall control the *alteration, repair, addition and change of occupancy or relocation of existing buildings* and structures, including *historic buildings* and structures as referenced in Section ~~301.1.1~~ 301.2.1.

**Exception:** Existing bleachers, grandstands and folding and telescopic seating shall comply with ICC 300.

**401.1.1 Compliance with other methods.** *Alterations, repairs, additions and changes of occupancy to or relocation of existing buildings* and structures shall comply with the provisions of this chapter or with one of the methods provided in Section ~~301.1~~ 301.2.

**~~SECTION 409 MOVED STRUCTURES~~**

**~~409.1 Conformance.~~** ~~Structures moved into or within the jurisdiction shall comply with the provisions of this code for new structures.~~

*(Renumber subsequent sections)*

**1401.1 Scope.** The provisions of this chapter shall apply to the *alteration, repair, addition and change of occupancy* of existing structures, including historic and moved structures, as referenced in Section ~~301.1.3~~ 301.2.3. The provisions of this chapter are intended to maintain or increase the current degree of public safety, health and general welfare in *existing buildings* while permitting *repair, alteration, addition and change of occupancy* without requiring full compliance with Chapters 5 through ~~13~~ 12, except where compliance with other provisions of this code is specifically required in this chapter.

*(Renumber subsequent sections)*

**Reason:** The purpose of this code change is to adequately address relocated or moved buildings in the IEBC. Currently, the three compliance methods address relocated/moved buildings in their respective scopes. This change will relocate Chapter 13, Relocated or Moved Buildings, and make it generally applicable for all three methods.

The topic is currently handled the following way:

Prescriptive Method- "Meet this code for new structures" [IEBC doesn't deal with new structures]

Work Area Method- Specific chapter that is not based upon the hierarchy of the work area method

Performance Method- No requirements provided

In short, the only method that has technical requirements is Chapter 13. Since the IBC covers relocated buildings in its scope, the use of new structure requirements for relocated or moved buildings is always an option anyway.

The IEBC has three different methods to give choices in the design of existing buildings. The reason for the choice to the applicant is to give options since every existing building is different, using legacy materials and having legacy code requirements. This is not the case for relocated buildings as the intent is to reuse an existing building in a different location rather than complete other rehabilitation work.

The Chapter layout would look like this:

1-Admin

2-Definitions

3-Prescriptive

4-General Requirements for all compliance methods

5-Work Area Classification of Work

6-Repairs

7-Alt. 1

8- Alt. 2

9- Alt. 3

10- Change of Occupancy

11-Additions

12- Historic Buildings

13- Performance Method

14- Relocated Buildings

15- Safeguards

16- Referenced Standards

In the alternative, a code change could be to modify the prescriptive method to have an appropriate reference to the IBC as well as the performance method to have some direction on the issue within it.

As a correlation note; if this proposal is denied by either the BCAC or the code development committee, a proposal has to go forward to repair IEBC 409.1 to reference the IBC.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

Code proposal is only to clarify the existing code requirements through a relocation (reorganization) of code sections, so there is no intended increase or decrease expected by approving this proposal.

## **Public Hearing Results**

**Committee Action:**

**Approved as Submitted**

**Committee Reason:** Relocated or moved buildings do not require various compliance methods. Currently, Chapter 4 does a poor job of addressing such buildings. Chapter 13 is more comprehensive and should apply in all cases. Chapter 13 Relocated or Moved Buildings will simply be renumbered as Chapter 14 and the performance method will become Chapter 13. It should be noted that Section 509 should be deleted.

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

#### *Public Comment 1:*

**Proponent : Vickie Lovell, InterCode Incorporated, representing Modular Building Institute (vickie@intercodeinc.com) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

#### **2015 International Existing Building Code**

**1202.3 Relocated buildings.** ~~Foundations of relocated historic buildings and structures shall comply with the *International Building Code*. Relocated historic buildings shall otherwise be considered an historic building for the purposes comply with Chapter 14 of this code. Relocated historic buildings and structures shall be sited so that exterior wall and opening requirements comply with the *International Building Code* or with the compliance alternatives of this code.~~

**Commenter's Reason:** This change to 1202.3 was inadvertently omitted from the list of code sections identified in EB 11-15 that needed to be modified in the IEBC to address moved or relocated structures and buildings, including historic buildings. This public comment is a cleanup that correlates numerous code sections in the IEBC that deal with relocated existing buildings. The purpose of this public comment is to point the code user to the appropriate code section of the IEBC for historic buildings when they are moved from one jurisdiction to another. The current text, if left unchanged, incorrectly directs the code user to the IBC. The newly renumbered Chapter 14 in the IEBC handles these issues.

**COST IMPACT:** Will not increase the cost of construction.

There is no cost impact with this proposal since the IEBC already addresses moved and relocated structures.

#### *Public Comment 2:*

**Proponent : Maureen Traxler, representing Seattle Dept of Planning & Development (maureen.traxler@seattle.gov) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

## 2015 International Existing Building Code

**301.3 Relocated Buildings** Relocated buildings shall comply with the requirements of Chapter ~~14~~ 5.

### **~~14~~ 5 RELOCATED OR MOVED BUILDINGS**

**Commenter's Reason:** We are proposing that the new chapter on relocated buildings be Chapter 5 instead of Chapter 14. This location makes sense because the chapters that apply to all existing building projects would be located together-- Chapter 3 "Provisions for All Compliance Methods", the new Chapter 4 "Repairs" created by EB10-15, followed by this Chapter 5 "Relocated or Moved Buildings." All three chapters will apply regardless of which compliance method is chosen for the project. The intent of this proposal is that all sections in the chapter would be renumbered, as would subsequent chapters.

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**EB11-15**

# EB13-15

## 301.1.5 (New)

### **Proposed Change as Submitted**

**Proponent:** David Collins, representing The American Institute of Architects (dcollins@preview-group.com); Ronald Nickson (rnickson@nmhc.org), representing National Multi-housing Council; Kevin Fry, BOMA International (Kfry@BOMA.org), representing BOMA International; Dan Buuck (dbuuck@nahb.org), representing NAHB

## 2015 International Existing Building Code

### **Add new text as follows:**

**301.1.5 Compliance with accessibility** Accessible requirements for existing buildings shall comply with the 2009 edition of ICC A117.1.

**Reason:** Dramatic changes are being proposed in the next edition of the ICC A117.1 standard that will accommodate a higher number of individuals. For example, the turning radius is being changed from 60" diameter to a 67" diameter, and clear floor space from 30"x48" to 30"x52" and related access to features. While these changes are able to be incorporated into new construction relatively easily, existing buildings that have been designed to conform with earlier standards or were modified to meet those earlier standards are likely to find that full compliance will create problems. Even using provisions based on the technical infeasibility for compliance will still require compliance in some circumstances that aren't justifiable financially and physically.

The Department of Justice in development of the 2010 ADA Standard allows for "grandfathering" of elements in an existing building that have already been made to conform and are found to comply with the earlier ADA standard. The 2009 edition of A117.1 provides the most comprehensively structured provisions for compliance with the original ADA and HUD standard, which is why a specific reference to that edition of the Standard for determining whether areas outside the specific alterations or change of occupancy must be modified.

**Cost Impact:** Will not increase the cost of construction

This change will reduce the cost of construction where changes have already been made to features of a building to conform to older accessibility standards. Under the proposed changes to A117.1 significant cost would be required to conform to these requirements often in areas where upgrades have already been performed in areas such as toilet rooms to meet the barrier removal requirements of the ADA or because of alterations and change of occupancy under the I-Codes when that work had been done prior to the adoption of this new standard.

EB13-15 : 301.1.5 (New)-  
COLLINS4462

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### **Public Hearing Results**

**Committee Action:**

**Approved as Submitted**

**Committee Reason:** This proposal which specifies the 2009 edition of A117.1 was

felt necessary to avoid difficulties in achieving compliance for existing buildings. The newer edition of A117.1 which is currently being developed is likely to have much more rigid requirements that will cause costly compliance issues. There was concern that the adoption of a specific edition should be revisited in future editions as these concerns may lessen. Also, it was suggested that a more precise application of A117.1 could be provided to avoid application of overly restrictive requirements to certain features without losing the reference to the most recent standard once it becomes available.

**Assembly Motion:**

**Disapprove**

**Online Vote Results:**

**Failed**

Support: 40.46% (70) Oppose: 59.54% (103)

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

#### *Public Comment 1:*

**Proponent : Jonathan Siu, City of Seattle, Dept of Planning & Development, representing City of Seattle Department of Planning & Development (jon.siu@seattle.gov) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

#### **2015 International Existing Building Code**

**301.1.5 Compliance with accessibility** Accessible Repairs, alterations, additions and changes of occupancy complying with the accessibility requirements for existing buildings in this code shall ~~comply~~ be constructed in accordance with the 2009 edition of the ICC A117.1 or the edition of the ICC A117.1 that was referenced when the building was originally constructed, whichever is later.

**Commenter's Reason:** While we agree it would be onerous in many cases to require older existing buildings to comply with the updated ICC A117.1 standard currently under development, the text as proposed opens a big loophole for buildings that would be required to comply with newer editions of ICC A117.1. We do not believe this was the intent of the proponent, so this proposed modification would close that loophole.

Recall that the definition of an existing building in the IEBC includes buildings "for which a legal building permit has been issued." This means that even before a spade of dirt is turned to start construction, the building is "existing." This then opens up a scenario where an applicant applies for and receives a building permit that would be required to comply with a new edition of ICC A117.1. The day after the permit is issued, the applicant submits a new permit application to alter the "existing building" to comply with the 2009 version of ICC A117.1. This subterfuge would be allowed under the current language, as approved by the Committee.

This proposed modification will limit the application of the 2009 ICC A117.1 only to those buildings that were not required to comply with a newer standard when they were constructed. Thus, those that were supposed to comply with a new standard will still be required to comply with it into the future. Those that were designed to comply with the 2009 version of the standard would be permitted to continue to use that standard as the basis for their designs and approvals into the future.

We are aware that ICC has a committee that is working to update ICC A117.1, and we

assume their intent is to have it adopted into the 2018 I-codes. However, this proposed modification does not tie the allowed use of 2009 ICC A117.1 to adoption of the 2018 IBC for the following reasons:

- The adoption of the ICC A117.1 version under development would be a proposal for next year's Group B code development cycle, and,
- Neither the completion of the latest version, nor its adoption into the 2018 IBC through the Group B cycle is a certainty at this point in time.

## *Public Comment 2:*

**Proponent : Marsha Mazz, representing U.S. Access Board (mazz@access-board.gov) requests Disapprove.**

**Commenter's Reason:** This proposal assumes that the next edition of the ICC/ANSI A117.1 will include changes that, if implemented, would have significant impact on existing buildings subject to the code. The proponents cited increases in the size of turning space and clear floor space as the reason for this action. While it is possible that these new requirements will have an impact on existing spaces, it is not reasonable to set aside in its entirety a new accessibility standard that is even more harmonized with ADA in order to address concerns regarding these few provisions. In our testimony against this proposal, we suggested that the proponents should act more strategically by including exceptions only for those provisions that cause them concern. Absent such limited exceptions, we believe that the existing provisions in the IBC allowing for compliance to the "maximum extent technically feasible" where "technical infeasibility" can be demonstrated sufficiently addresses the concern that some existing buildings cannot accommodate the new requirements. In fact, some buildings cannot accommodate the older requirements and must depend on technical infeasibility.

The proponent's reason statement compared their proposed retention of a dated accessibility standard to the Department of Justice (DOJ) safe harbor for existing buildings in compliance with the 1991 ADA Standard. This comparison fails in one significant way. The DOJ safe harbor does not apply where a building or facility is altered or added to. The DOJ safe harbor applies only where state or local governments and public accommodations have an affirmative duty to remove barriers in existing buildings and facilities that predate the effective date of the ADA Standards. These requirements are known as program accessibility (28 CFR 35.149 and 35.150) and removal of barriers (28 CFR 36.304). There is no corollary to program accessibility or barrier removal in the IBC or the IEBC because, unlike the building code, the ADA often requires the accessibility of a building to be upgraded regardless of whether an alteration or addition is undertaken. Under the ADA, alterations and additions must comply with the accessibility standards in effect at the time of construction unless compliance is technically infeasible (28 CFR 35.151 and 28 CFR 36.406).

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**EB13-15**

# EB20-15

## 402.1.1 (New), 410.6, 705.1, 1105.2 (New)

### Proposed Change as Submitted

**Proponent :** Gene Boecker (geneb@codeconsultants.com)

## 2015 International Existing Building Code

### Add new text as follows:

**402.1.1 Accessible Means of Egress** Additions shall provide accessible means of egress in accordance with Section 1009 of the *International Building Code*. Where the accessible means of egress from the addition leads through the existing building, the associated accessible means of egress path in the existing building shall be altered to be in accordance with Section 1009 of the *International Building Code*. Means of egress in the addition and existing building that are not accessible shall be provided with directional signage in accordance with Section 1009 of the *International Building Code* at the non-accessible portion of the means of egress.

### Revise as follows:

**410.6 Alterations.** A facility that is altered shall comply with the applicable provisions in Chapter 11 of the *International Building Code*, unless *technically infeasible*. Where compliance with this section is *technically infeasible*, the alteration shall provide access to the maximum extent technically feasible.

#### Exceptions:

1. The altered element or space is not required to be on an accessible route, unless required by Section 410.7.
2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing facilities except as required by Section 402.1.1.
3. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall be permitted to meet the provision for a Type B dwelling unit.
4. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in *existing buildings* and facilities undergoing a *change of occupancy* in conjunction with *alterations* where the *work area* is 50 percent or less of the aggregate area of the building.

**705.1 General.** A facility that is altered shall comply with the applicable provisions in Sections 705.1.1 through 705.1.14, and Chapter 11 of the *International Building Code* unless it is *technically infeasible*. Where compliance with this section is *technically infeasible*, the alteration shall provide access to the maximum extent that is technically feasible.

A facility that is constructed or altered to be accessible shall be maintained accessible during occupancy.

#### Exceptions:

1. The altered element or space is not required to be on an



- accessible route unless required by Section 705.2.
2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing *facilities* except as required by Section 1101.1.1.
  3. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing *facilities* undergoing less than a Level 3 *alteration*.
  4. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall meet the provisions for Type B dwelling units.

**Add new text as follows:**

**1105.2 Accessible means of egress** Additions shall provide accessible means of egress in accordance with Section 1009 of the International Building Code. Where the accessible means of egress from the addition leads through the existing building, the associated accessible means of egress path in the existing building shall be altered to be in accordance with Section 1009 of the International Building Code. Means of egress in the addition and existing building that are not accessible shall be provided with directional signage in accordance with Section 1009 of the International Building Code at the non-accessible portion of the means of egress.

**Reason:** The proposal clarifies the application of the requirement for accessible means of egress (AMOE) in additions. The concept is the same for both the Prescriptive Compliance Method and Work Area Compliance Method. No proposal is made for Chapter 14 because Section 1401.2.5 already refers back to Sections 410 and 705 for accessibility compliance when using the Performance Compliance Method.

**402.1.1 and 1101.1.1** - Because Section 410.6 of the IEBC (and Section 1009.1 of the IBC) contains an exception that states that the AMOE is not required in existing buildings, it creates confusion regarding what needs to be done when the AMOE from the addition leads through the existing building; whether it must continue through the existing building and require modification to the existing building as is implied in Section 402.1 or whether it can stop at the existing building due the explicit language in exception 2 of Section 410.6.

The proposed language makes it clear that if the path of egress within the existing building cannot be made to comply with the requirements for an accessible means of egress, then the addition will need to provide all the AMOE requirements for the addition. This is the only option.

Finally, signage is required at the means of egress for both the addition and the existing building where those egress elements do not comply with the AMOE provisions of the IBC. If the means of egress in either the addition or existing building cannot meet the requirements as an AMOE then the directional signage must be provided so that the occupants can find the AMOE.

**410.6 and 705.1** - It is clear that the blanket exception that the existing building is not required to have any accessible means of egress is not completely true. The requirements for the addition may force that upon the existing building. The text of these two sections should recognize and reflect that.

**Cost Impact:** Will not increase the cost of construction  
The text is a clarification of the current interpretation.

## Public Hearing Results

**Committee Action:**

**Disapproved**

**Committee Reason:** There was concern that this proposal added unnecessary wording to an issue that is technically already addressed. Also, the cost implication of this new section is unclear. The 20% cost limit provided for the accessible route requirements does not appear to be applicable.

**Assembly Motion:**

**As Submitted**

**Online Vote Results:**

**Failed**

Support: 37.87% (64) Oppose: 62.13% (105)

**Assembly Action :**

**None**

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## Individual Consideration Agenda

### *Public Comment 1:*

**Proponent : Gene Boecker, representing Code Consultants, Inc. (geneb@codeconsultants.com) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**402.1.1 Accessible Means of Egress** Additions shall provide accessible means of egress in accordance with Section 1009 of the *International Building Code*. Where the accessible means of egress from the addition leads through the existing building, the associated accessible means of egress path in the existing building shall be altered to be in accordance with Section 1009 of the *International Building Code*. Means of egress in the addition and existing building that are not accessible shall be provided with directional signage in accordance with Section 1009 of the *International Building Code* at the non-accessible portion of the means of egress. Alterations to provide an accessible means of egress in the existing building shall provide access to the maximum extent technically feasible.

**Exception:** The cost of providing the accessible means of egress through the existing building shall not be required to exceed five percent (5%) of the costs of the addition.

**Commenter's Reason:** By the committee's own discussion, it is clear that this issue needs to be further addressed. Some felt that it was already implied by the current text that to provide an accessible means of egress from the addition, the existing building needed to be modified as necessary. Others felt that the cost would be too great if the proposal went through as is because they would not infer that the existing building needed any work as a result of an addition. The additional language provides a cut-off on the cost to address the accessible means of egress in the existing building. For very small projects, the cost may include only the replacement of a threshold. This addresses the cost concern expressed. Without some language on this issue it will remain unclear and be enforced differently throughout the country. If we cannot address this comprehensively, at least let us take a start at clarifying the need to do something.

The other sections of the original proposal were not addressed in this public comment because Code Change EB33 reshuffles the sections of the IEBC. If

this public comment is approved it will need to be inserted and referenced properly based on the action on EB 33.

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**EB20-15**

# EB21-15

**402.6 (New), 403.11 (New), 804.4.4 (New), 1105 (New), 1105.1 (New)**

## **Proposed Change as Submitted**

**Proponent :** Adolf Zubia, representing IAFC Fire & Life Safety Section

### **2015 International Existing Building Code**

**Add new text as follows:**

**402.6 Carbon monoxide alarms in existing portions of a building.** Where an addition is made to a building or structure of a Group I-1, I-2, I-4 or R occupancy, the existing building shall be provided with carbon monoxide alarms in accordance with Section 1103.9 of the *International Fire Code* or Section R315 of the *International Residential Code*, as applicable.

**403.11 Carbon monoxide alarms.** Carbon monoxide alarms shall be provided to protect sleeping units and dwelling units in Group I-1, I-2, I-4 and R occupancies in accordance with Section 1103.9 of the *International Fire Code*.

**804.4.4 Carbon monoxide alarms.** Sleeping units and dwelling units in any work area in Group I-1, I-2, I-4 and R occupancies shall be equipped with carbon monoxide alarms in accordance with Section 1103.9 of the *International Fire Code*.

### **SECTION 1105 CARBON MONOXIDE ALARMS IN GROUPS I-1, I-2, I-4 AND R**

**1105.1 Carbon monoxide alarms in existing portions of a building** Where an addition is made to a building or structure of a Group I-1, I-2, I-4 or R occupancy, the existing building shall be equipped with carbon monoxide alarms in accordance with Section 1103.9 of the *International Fire Code* or Section R315 of the *International Residential Code*, as applicable.

**Reason:** This proposal is submitted by the Fire and Life Safety Section of the International Association of Fire Chiefs.

IFC Section 1103.8 contains requirements for installing smoke alarms in existing occupancies. Those requirements are reflected in the IEBC Sections 402.5, 403.10, 804.4.3 and 1104.1. IFC Section 1103.9 contains requirements for installing carbon monoxide alarms in existing occupancies; however, those requirements are currently not reflected in the IEBC.

This proposal corrects this oversight with the new proposed code sections.

This proposal will provide consistency between the IFC, IRC and the IEBC with regard to the installation and requirements of carbon monoxide alarms.

**Cost Impact:** Will not increase the cost of construction

The cost of construction will not increase since the existing buildings should already be in compliance with the requirements in IFC Section 1103.9. This proposal simply provides correlation between the I-Codes.

## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The proposal was disapproved as it was not felt necessary to add these requirements to the IEBC already addressed by the IFC. In addition, there was concern that the cost impact was not addressed in enough detail and education is a better way to encourage the use of such detection.

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

#### *Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

#### **2015 International Existing Building Code**

##### **402.6 Carbon monoxide alarms in existing portions of a building.**

Where an addition is made to a building or structure of a Group I-1, I-2, I-4 or R occupancy, the existing building shall be provided with carbon monoxide alarms in accordance with Section 1103.9 of the *International Fire Code* or Section R315 of the *International Residential Code*, as applicable.

##### **Exceptions:**

1. Work involving the exterior surfaces of buildings, such as the replacement of roofing or siding, or the addition or replacement of windows or doors, or the addition of porches or decks, is exempt from the requirements of this section.
2. Installation, alteration or repairs of plumbing or mechanical systems, other than fuel-burning appliances, are exempt from the requirements of this section.

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**403.11 Carbon monoxide alarms.** Carbon monoxide alarms shall be provided to protect sleeping units and dwelling units in Group I-1, I-2, I-4 and R occupancies in accordance with Section 1103.9 of the *International Fire Code*.

##### **Exceptions:**

1. Work involving the exterior surfaces of buildings, such as the replacement of roofing or siding, or the addition or replacement of windows or doors, or the addition of porches or decks, is exempt from the requirements of this section.
2. Installation, alteration or repairs of plumbing or mechanical systems, other than fuel-burning appliances, are exempt from the requirements of this section.

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## **SECTION 805 CARBON MONOXIDE DETECTION**

~~804.4.4~~ **805.1 Carbon monoxide alarms.** ~~Sleeping units and dwelling units in any~~ Any work area in Group I-1, I-2, I-4 and R occupancies shall be equipped with carbon monoxide alarms in accordance with Section 1103.9 of the International Fire Code.

### **Exceptions:**

1. Work involving the exterior surfaces of buildings, such as the replacement of roofing or siding, or the addition or replacement of windows or doors, or the addition of porches or decks, is exempt from the requirements of this section.
2. Installation, alteration or repairs of plumbing or mechanical systems, other than fuel-burning appliances, are exempt from the requirements of this section.

**Commenter's Reason:** The proposal was disapproved as it was not felt necessary to add these requirements to the IEBC already addressed by the IFC. Response: The CO alarm requirements replicate smoke alarm requirements that were judged to be necessary.

This Public Comment (PC) will provide consistency between the IFC, IRC and the IEBC with regard to the installation requirements of carbon monoxide detection in existing buildings. Section 1103.9 of the IFC and Section R315 of the IRC contain requirements for installation of CO detection in existing occupancies. However there are no such requirements in the IEBC.

The ICC membership has already determined that CO poisoning as a distinct hazard and has placed specific provisions in the IFC and IRC for CO detection in existing occupancies. Since the determination of a hazard is already identified in the aforementioned Codes similar requirements need to be added to the IEBC.

Also, in the absence of a model building code for the installation of CO detection in existing occupancies many jurisdictions are passing laws for CO detection in existing buildings with varying installation requirements.

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**EB21-15**

# EB23-15

403.2 (New), 704.1, 704.2 (New)

## Proposed Change as Submitted

**Proponent :** Adolf Zubia, representing IAFC Fire & Life Safety Section

### 2015 International Existing Building Code

**Add new text as follows:**

**403.2 Locking arrangements in Group E occupancies.** Where approved by the code official, egress doors from classrooms, offices and other occupied rooms in Group E occupancies shall be allowed to be provided with locking arrangements designed to keep intruders from entering the room that require a key, special knowledge or effort when all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
3. Modifications to fire door assemblies shall be in accordance with NFPA 80.
4. The unlatching of the door or leaf shall be allowed to require two operations.

**Revise as follows:**

**704.1 General.** *Alterations* shall be done in a manner that maintains the level of protection provided for the means of egress, except as allowed in Section 704.2.

**Add new text as follows:**

### **704.2 Locking arrangements in Group E occupancies.**

Where approved by the code official, egress doors from classrooms, offices and other occupied rooms in Group E occupancies shall be allowed to be provided with locking arrangements designed to keep intruders from entering the room that require a key, special knowledge or effort when all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
3. Modifications to fire door assemblies shall be in accordance with NFPA 80.
4. The unlatching of the door or leaf shall be allowed to require two operations.

**Reason:** This proposal is submitted by Fire and Life Safety Section of the International Association of Fire Chiefs.

Unfortunately active shooter incidents in schools are a threat in modern society that have resulted in the need to quickly secure classrooms and other occupied areas to

keep unwanted intruders from entering.

Many unlisted devices are being used to secure the doors from being opened. Many of these devices have not been evaluated to insure they operate properly and do not impair door operation. These devices are being deployed in periodic lockdown drills, and present the potential to for students or unauthorized personnel to secure the doors so the rooms cannot be entered.

This proposal allows key actuated deadbolts or other locks to be provided on classroom doors, where the teacher can choose to lock the door and provide shelter-in-place in the classroom. The proposed change also requires the door to be able to be unlocked from the opposite side in cases where the school administrator or responders wish to enter the room without having to make a forcible entry.

Door hardware is currently available that allows classroom to be provided with lockdown capabilities that comply with applicable IBC Chapter 10 requirements. However the costs of retrofitting doors with that hardware far exceed the cost of retrofitting with a simple deadbolt lock. This is a significant issue for school systems who are continually facing budget restrictions.

This code change limits this optional locking method only when the building is undergoing alternations. This allowance is intentionally not provided for buildings undergoing additions or a change of occupancy.

It is not necessary to add new language to the Chapter 9 alteration provisions since Section 905.1 references Section 805 means of egress requirements.

**Cost Impact:** Will not increase the cost of construction

This proposal allows an option that may result in lower costs than retrofitting egress doors with locking hardware that complies with IBC Chapter 10 requirements.

EB23-15 : 704.1-  
ZUBIA4731

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## **Public Hearing Results**

**Committee Action:**

**Approved as Modified**

**Modification:**

### **403.2 Locking arrangements in Group E occupancies.**

Where approved by the code official, egress doors from classrooms, offices and other occupied rooms in Group E occupancies shall be allowed to be provided with locking arrangements designed to keep intruders from entering the room ~~that require a key, special knowledge or effort~~ when all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
3. Modifications to fire door assemblies shall be in accordance with NFPA 80.
4. ~~The unlatching of the door or leaf shall be allowed to require two operations.~~



## **704.2 Locking arrangements in Group E occupancies.**

Where approved by the code official, egress doors from classrooms, offices and other occupied rooms in Group E occupancies shall be allowed to be provided with locking arrangements designed to keep intruders from entering the room ~~that require a key, special knowledge or effort~~ when all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
3. Modifications to fire door assemblies shall be in accordance with NFPA 80. .
4. ~~The unlatching of the door or leaf shall be allowed to require two operations.~~

**Committee Reason:** The committee preferred this proposal over E57-15 Part II with the inclusion of the modification. Note that E57-15 Part II was approved. This proposal provides special locking arrangements if they are necessary versus mandating the use of such arrangements. The modification deletes the language from each proposed section that states "that require a key, special knowledge and effort" as the verbiage would limit the provisions only to those types of locks. Item 4 was deleted from each section as it conflicts with accessibility requirements.

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

#### *Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org); Adolf Zubia, representing International Association of Fire Chiefs, Fire & Life Safety Section , representing International Assoc of Fire Chiefs, Fire & Life Safety Section (azubiamia@yahoo.com) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**403.2 Locking arrangements in Group E educational occupancies.** ~~Where approved by the code official~~ In Group E and Group B educational occupancies, egress doors from classrooms, offices and other occupied rooms ~~in Group E occupancies shall be allowed~~ permitted to be provided with locking arrangements designed to keep intruders from entering the room ~~when~~ where all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.

2. The door shall be openable from within the room in accordance with Section 1010.1.9 of the International Building Code.
3. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
4. Modifications to fire door assemblies shall be in accordance with NFPA 80.

#### **704.2 Locking arrangements in ~~Group E~~ educational**

**occupancies.** ~~Where approved by the code official, egress~~ Egress doors from classrooms, offices and other occupied rooms in Group E and Group B educational occupancies shall be allowed to be provided with locking arrangements designed to keep intruders from entering the room when all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. The door shall be openable from within the room in accordance with Section 1010.1.9 of the International Building Code.
3. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
4. Modifications to fire door assemblies shall be in accordance with NFPA 80. .

**Commenter's Reason:** At the Memphis hearings the committee voted unanimously to approve this proposal, with a floor modification. This public comment makes a few additional modifications to the proposal as follows:

1. Testimony was provided at the CAH suggesting these requirements be expanded to cover college classrooms, offices, and other occupied rooms (such as teacher lounges, central office areas, and similar rooms where locking out potential intruders is judged appropriate). Revisions to expand the section to cover Group B educational occupancies addresses this concern.
2. The original proposal allowed unlatching of the door from inside the room to require two operations, where approved by the code official. The provision allowing two operations to unlatch the door was removed with a floor amendment at the hearings. With that removed there is no need to retain "Where required by the code official" in this section.
3. New item 2 clarifies that the door must be openable from within the room in accordance with 1010.19 of the IBC. This will ensure that (1) egress doors are readily openable from the inside without use of a tool or special knowledge, (2) unlatching of the door will not require more than one operation, (3) door handles will meet accessibility requirements, and (4) hardware height is appropriate.

### *Public Comment 2:*

**Proponent : Region VII, representing ICC Region VII (admin@iccregionvii.org) requests Disapprove.**

**Commenter's Reason:** Current modified language adds nothing new to the existing requirements additionally this may not allow the AHJ to have oversight in regards to the locking system of egress doors.

# EB28-15

405.5

## Proposed Change as Submitted

**Proponent :** Jeff Hugo, National Fire Sprinkler Association, representing National Fire Sprinkler Association (hugo@nfsa.org)

### 2015 International Existing Building Code

**Revise as follows:**

**405.5 Opening protectives.** Doors and windows ~~along the~~ within 10 feet of fire escape stairways shall be protected with <sup>3</sup> /4 -hour opening protectives.

**Exception:** Opening protection shall not be required in buildings equipped throughout with an automatic sprinkler system.

**Reason:** Section 805.3.1.2.1 permits this exception for Level 2 Alterations. This proposal would provide the same exception for fire doors and windows along the fire escape when using the prescriptive compliance method.

**Cost Impact:** Will not increase the cost of construction  
When fire sprinkler systems are installed there would be no need to install new opening protectives.

EB28-15 : 405.5-  
HUGO4696

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## Public Hearing Results

**Committee Action:**

**Approved as Submitted**

**Committee Reason:** This proposal was approved for consistency with the current provisions in Section 805.3.1.2.1 Item 4.

**Assembly Action :**

**None**

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## Individual Consideration Agenda

*Public Comment 1:*

**Proponent : Tom Zaremba, Roetzel & Andress, representing Alliance of Primary Fire Rated Manufacturers (tzaremba@ralaw.com) requests Disapprove.**

**Commenter's Reason:** EB28-15 should be disapproved. The Committee's and the Proponent's only support for adopting EB28-15 is "consistency" with an exception found in IEBC Section 805.3.1.2.1. However, that "consistency" can only be achieved by creating an inconsistency with IFC Section 1103.1 and by giving EC28-15 a "free pass" to circumvent changes made to the 2015 IEBC and IFC that are now being carried forward into Ch. 4 of the IEBC by EB16-15. These IEBC and IFC changes specify exactly **how** changes to fire protection features in existing buildings **may** be allowed if automatic sprinklers are added.

The analysis begins with Section 1103.1 of the IFC. It provides: "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." This is significant to EB28-15 since IEBC Chapter 4 compliance depends on compliance with the IFC. IEBC Section 301.1.1 provides that: "*Repairs, alterations, additions and changes of occupancy* complying with Chapter 4 of this code **in buildings complying with the International Fire Code** shall be considered in compliance with the provisions of this code." (Emphasis added.)

In 2015, the IEBC and IFC were both changed to specify exactly what is required to change fire protection features in an existing building when automatic sprinklers are added throughout.

Section 803.6 was added to the IEBC in 2015 and provides:

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

Plans, investigation and evaluation reports, and other data **shall be submitted** indicating which building elements and materials the applicant is requesting the code official to review and approve for determination of applying the current building code fire-resistance ratings. Any special construction features, including fire-resistance-rated assemblies and smoke-resistive assemblies, conditions of occupancy, means-of-egress conditions, fire code deficiencies, approved modifications or approved alternative materials, design or methods of construction, and equipment applying to the building that impact required fire-resistance ratings shall be identified in the evaluation reports. (Emphasis added).

A corresponding change was made to the IFC in 2015, allowing changes made pursuant to IEBC Section 803.6 as an exception to IFC Section 1103.1. However, no change to coordinate EB28-15 with IFC Section 1103.1 has been proposed. As indicated earlier, use of IEBC Chapter 4 depends on compliance with the IFC.

Earlier this year, EB16-15 was unanimously approved by the Technical Committee. It would add language identical to IEBC 803.6 to IEBC Chapter 4. As set out in the statement supporting EB16-15:

The suggested language ... requires ... any special construction features, conditions of occupancy, approved modifications or approved alternative materials, design and methods of construction, and equipment applying to the building that impact required fire-resistance ratings shall be identified in the evaluation reports submitted. This is to ensure [that] special conditions are identified that may [result in] a reduction in fire-resistance ratings.

If approved, EB28-15 will put the IEBC in conflict with IFC Section 1103.1 since there is no exception for EB28-15 in IFC Section 1103.1. Second, if adopted, EB28-15 will give a "free pass" to circumvent the analysis, review and approval requirements of IEBC Section 803.6, soon to be a part of the prescriptive provisions of Chapter 4 of the IEBC by reason of EB16-15.

We urge you to vote against the standing motion to approve EB28-15 and to vote in favor of a motion to disapprove EB28-15. If adopted, EB28-15 would automatically reduce the fire protection features of existing buildings without benefit of the analysis already found in IEBC Section 803.6 and proposed for Chapter 4 of the IEBC by EB16-15. It would also create an unnecessary conflict with the IFC.

# EB33-15

**410, 705, 801.1, 806, 901.2, 906, 1006, 1012.1.4, 1012.8, 1105, 1204, 1401.2.5, B101.3, B101.4, B102.2.3**

## **Proposed Change as Submitted**

**Proponent:** David Collins, representing The American Institute of Architects (dcollins@preview-group.com); Maureen Traxler, City of Seattle (maureen.traxler@seattle.gov) representing City of Seattle Dept of Planning and Development; Steven Winkel (swinkel@preview-group.com) representing the Preview Group

## **2015 International Existing Building Code**

### **Revise as follows:**

**410.1 303.1 Scope.** The provisions of Sections ~~410.1~~ 303.1 through ~~410.9~~ 303.9 apply to maintenance, *change of occupancy*, *additions* and *alterations* to existing buildings, including those identified as *historic buildings*.

**410.2 303.2 Maintenance of facilities.** *No change to text.*

**410.3 303.3 Extent of application.** *No change to text.*

**410.4 303.4 Change of occupancy.** *No change to text.*

**410.4.1 303.4.1 Partial change in occupancy.** Where a portion of the building is changed to a new occupancy classification, any *alterations* shall comply with Sections ~~410.6~~ 303.6, ~~410.7~~ 303.7 and ~~410.8~~ 303.8.

**410.4.2 303.4.2 Complete change of occupancy.** Where an entire building undergoes a *change of occupancy*, it shall comply with Section ~~410.4.1~~ 303.4.1 and shall have all of the following accessible features:

1. At least one accessible building entrance.
2. At least one accessible route from an accessible building entrance to *primary function* areas.
3. Signage complying with Section 1111 of the *International Building Code*.
4. Accessible parking, where parking is being provided.
5. At least one accessible passenger loading zone, when loading zones are provided.
6. At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.

Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy, the above items shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible features listed in Items 1 through 6 are not required for an accessible route to Type B units.

**410.5 303.5 Additions.** Provisions for new construction shall apply to *additions*. An *addition* that affects the accessibility to, or contains an area of, a *primary function* shall comply with the requirements in Section ~~410.7~~ 303.7.

**410.6 303.6 Alterations.** A *facility* that is altered shall comply with the applicable provisions in Chapter 11 of the *International Building Code*, unless *technically infeasible*. Where compliance with this section is *technically infeasible*, the *alteration* shall provide access to the maximum extent technically feasible.

**Exceptions:**

1. The altered element or space is not required to be on an accessible route, unless required by Section ~~410.7~~ 303.7.
2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing facilities.
3. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall be permitted to meet the provision for a Type B dwelling unit.
4. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in *existing buildings* and facilities undergoing a *change of occupancy* in conjunction with *alterations* where the *work area* is 50 percent or less of the aggregate area of the building.

**410.7 303.7 Alterations affecting an area containing a primary function.** *No change to text.*

**410.8 303.8 Scoping for alterations.** The provisions of Sections ~~410.8.1~~ 303.8.1 through ~~410.8.14~~ 303.8.15 shall apply to *alterations* to *existing buildings* and *facilities*.

**410.8.1 303.8.1 Entrances.** *No change to text.*

**410.8.2 303.8.2 Elevators.** *No change to text.*

**410.8.3 303.8.3 Platform lifts.** *No change to text.*

**410.8.4 303.8.4 Stairways and escalators in existing buildings.** *No change to text.*

**410.8.5 303.8.5 Ramps.** Where slopes steeper than allowed by Section 1012.2 of the *International Building Code* are necessitated by space limitations, the slope of ramps in or providing access to existing facilities shall comply with Table ~~410.8.5~~ 303.8.5.

**TABLE 303.8.5  
RAMPS**

SLOPE	MAXIMUM RISE
-------	-----------------

Steeper than 1:10 but not steeper than 1:8	3 inches
Steeper than 1:12 but not steeper than 1:10	6 inches

For SI: 1 inch = 25.4 mm.

**~~410.8.6~~ 303.8.6 Accessible dwelling or sleeping units.** *No change to text.*

**~~410.8.7~~ 303.8.7 Type A dwelling or sleeping units.** *No change to text.*

**~~410.8.8~~ 303.8.8 Type B dwelling or sleeping units.** *No change to text.*

**303.8.9 Dining areas** An accessible route to raised or sunken dining areas or to outdoor seating areas is not required provided that the same services and decor are provided in an accessible space usable by any occupant and not restricted to use by people with a disability.

**~~410.8.9~~ 303.8.10 Jury boxes and witness stands.** *No change to text.*

**~~410.8.10~~ 303.8.11 Toilet rooms.** *No change to text.*

**~~410.8.11~~ 303.8.12 Dressing, fitting and locker rooms.** *No change to text.*

**~~410.8.12~~ 303.8.13 Fuel dispensers.** *No change to text.*

**~~410.8.13~~ 303.8.14 Thresholds.** *No change to text.*

**~~410.8.14~~ 303.8.15 Amusement rides.** *No change to text.*

**410.9 303.9 Historic buildings.** These provisions shall apply to *facilities* designated as historic structures that undergo *alterations* or a *change of occupancy*, unless *technically infeasible*. Where compliance with the requirements for accessible routes, entrances or toilet rooms would threaten or destroy the historic significance of the *facility*, as determined by the applicable governing authority, the alternative requirements of Sections ~~410.9.1~~ 303.9.1 through ~~410.9.4~~ 303.9.4 for that element shall be permitted.

**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in historical buildings.

**~~410.9.1~~ 303.9.1 Site arrival points.** *No change to text.*

**~~410.9.2~~ 303.9.2 Multilevel buildings and facilities.** *No change to text.*

**~~410.9.3~~ 303.9.3 Entrances.** *No change to text.*

**~~410.9.4~~ 303.9.4 Toilet and bathing facilities.** *No change to text.*

**801.1 Scope.** Level 2 *alterations* as described in Section 504 shall comply with the requirements of this chapter.

**Exception:** Buildings in which the reconfiguration is exclusively the result of compliance with the accessibility requirements of Section ~~705.2~~ 303.7 shall be permitted to comply with Chapter 7.

**901.2 Compliance.** In addition to the provisions of this chapter, work shall comply with all of the requirements of Chapters 7 and 8. The requirements of Sections 803, 804 and 805 shall apply within all *work areas* whether or not they include exits and corridors shared by more than one tenant and regardless of the occupant load.

**Exception:** Buildings in which the reconfiguration of space affecting exits or shared egress access is exclusively the result of compliance with the accessibility requirements of Section ~~705.2~~ 303.7 shall not be required to comply with this chapter.

**~~[BS]~~B101.3 Qualified historic buildings and facilities subject to Section 106 of the National Historic Preservation Act.** Where an *alteration or change of occupancy* is undertaken to a qualified *historic building* or facility that is subject to Section 106 of the National Historic Preservation Act, the federal agency with jurisdiction over the undertaking shall follow the Section 106 process. Where the state historic preservation officer or Advisory Council on Historic Preservation determines that compliance with the requirements for accessible routes, ramps, entrances, or toilet facilities would threaten or destroy the historic significance of the building or facility, the alternative requirements of Section ~~410.9~~ 303.9 for that element are permitted.

**~~[BS]~~B101.4 Qualified historic buildings and facilities not subject to Section 106 of the National Historic Preservation Act.** Where an *alteration or change of occupancy* is undertaken to a qualified *historic building* or facility that is not subject to Section 106 of the National Historic Preservation Act, and the entity undertaking the alterations believes that compliance with the requirements for accessible routes, ramps, entrances, or toilet facilities would threaten or destroy the historic significance of the building or facility, the entity shall consult with the state historic preservation officer. Where the state historic preservation officer determines that compliance with the accessibility requirements for accessible routes, ramps, entrances, or toilet facilities would threaten or destroy the historical significance of the building or facility, the alternative requirements of Section ~~410.9~~ 303.9 for that element are permitted.

**~~[BS]~~B102.2.3 Direct connections.** New direct connections to commercial, retail, or residential facilities shall, to the maximum extent feasible, have an accessible route complying with Section ~~705.2~~ 303.7 from the point of connection to boarding platforms and transportation system elements used by the public. Any elements provided to facilitate future direct connections shall be on an accessible route connecting boarding platforms and transportation system elements used by the public.

**Delete without substitution:**

## ~~SECTION 705 ACCESSIBILITY~~



~~**705.1 General.** A facility that is altered shall comply with the applicable provisions in Sections 705.1.1 through 705.1.14, and Chapter 11 of the *International Building Code* unless it is *technically infeasible*. Where compliance with this section is *technically infeasible*, the alteration shall provide access to the maximum extent that is technically feasible.~~

~~A facility that is constructed or altered to be accessible shall be maintained accessible during occupancy.~~

**Exceptions:**

- ~~1. The altered element or space is not required to be on an accessible route unless required by Section 705.2.~~
- ~~2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing facilities.~~
- ~~3. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing facilities undergoing less than a Level 3 alteration.~~
- ~~4. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall meet the provisions for Type B dwelling units.~~

~~**705.1.1 Entrances.** Where an alteration includes alterations to an entrance, and the facility has an accessible entrance on an accessible route, the altered entrance is not required to be accessible unless required by Section 705.2. Signs complying with Section 1111 of the *International Building Code* shall be provided.~~

~~**705.1.2 Elevators.** Altered elements of existing elevators shall comply with ASME A17.1/CSA B44 and ICC A117.1. Such elements shall also be altered in elevators programmed to respond to the same hall call control as the altered elevator.~~

~~**705.1.3 Platform lifts.** Platform (wheelchair) lifts complying with ICC A117.1 and installed in accordance with ASME A18.1 shall be permitted as a component of an accessible route.~~

~~**705.1.4 Ramps.** Where steeper slopes than allowed by Section 1012.2 of the *International Building Code* are necessitated by space limitations, the slope of ramps in or providing access to existing facilities shall comply with Table 705.1.4.~~

**RAMPS**

SLOPE	MAXIMUM RISE
Steeper than 1:10 but not steeper than 1:8	3 inches
Steeper than 1:12 but not steeper than 1:10	6 inches

For SI: 1 inch = 25.4 mm.

~~**705.1.5 Dining areas.** An accessible route to raised or sunken dining areas or to outdoor seating areas is not required provided that the same services and decor are provided in an accessible space usable by any occupant and not restricted to use by people with a disability.~~

~~**705.1.6 Jury boxes and witness stands.** In *alterations*, accessible wheelchair spaces are not required to be located within the defined area of raised jury boxes or witness stands and shall be permitted to be located outside these spaces where ramp or lift access poses a hazard by restricting or projecting into a required means of egress.~~

~~**705.1.7 Accessible dwelling or sleeping units.** Where Group I-1, I-2, I-3, R-1, R-2 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Accessible units apply only to the quantity of the spaces being altered.~~

~~**705.1.8 Type A dwelling or sleeping units.** Where more than 20 Group R-2 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type A units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered.~~

~~**705.1.9 Toilet rooms.** Where it is technically infeasible to alter existing toilet and bathing rooms to be accessible, an accessible family or assisted-use toilet or bathing room constructed in accordance with Section 1109.2.1 of the *International Building Code* is permitted. The family or assisted-use toilet or bathing room shall be located on the same floor and in the same area as the existing toilet or bathing rooms. At the inaccessible toilet and bathing rooms, directional signs indicating the location of the nearest family or assisted-use toilet room or bathing room shall be provided. These directional signs shall include the International Symbol of Accessibility and sign characters shall meet the visual character requirements in accordance with ICC A117.1.~~

~~**705.1.10 Dressing, fitting and locker rooms.** Where it is *technically infeasible* to provide accessible dressing, fitting, or locker rooms at the same location as similar types of rooms, one accessible room on the same level shall be provided. Where separate sex facilities are provided, accessible rooms for each sex shall be provided. Separate sex facilities are not required where only unisex rooms are provided.~~

~~**705.1.11 Fuel dispensers.** Operable parts of replacement fuel dispensers shall be permitted to be 54 inches (1370 mm) maximum measured from the surface of the vehicular way where fuel dispensers are installed on existing curbs.~~

~~**705.1.12 Thresholds.** The maximum height of thresholds at doorways shall be  $\frac{3}{4}$  inch (19.1 mm). Such thresholds shall have beveled edges on each side.~~

~~**705.1.13 Extent of application.** An *alteration* of an existing element, space, or area of a *facility* shall not impose a requirement for greater accessibility than that which would be required for new construction. *Alterations* shall not reduce or have the effect of reducing accessibility of a~~

~~facility or portion of a facility.~~

~~**705.1.14 Amusement rides.** Where the structural or operational characteristics of an amusement ride are altered to the extent that the amusement ride's performance differs from that specified by the manufacturer or the original design, the amusement ride shall comply with requirements for new construction in accordance with Section 1110.4.8 of the *International Building Code*.~~

~~**705.2 Alterations affecting an area containing a primary function.** Where an *alteration* affects the accessibility to a, or contains an area of, *primary function*, the route to the primary function area shall be accessible. The accessible route to the *primary function* area shall include toilet facilities and drinking fountains serving the area of *primary function*.~~

**Exceptions:**

- ~~1. The costs of providing the accessible route are not required to exceed 20 percent of the costs of the alterations affecting the area of *primary function*.~~
- ~~2. This provision does not apply to *alterations* limited solely to windows, hardware, operating controls, electrical outlets and signs.~~
- ~~3. This provision does not apply to *alterations* limited solely to mechanical systems, electrical systems, installation or *alteration* of fire protection systems and abatement of hazardous materials.~~
- ~~4. This provision does not apply to *alterations* undertaken for the primary purpose of increasing the accessibility of a *facility*.~~
- ~~5. This provision does not apply to altered areas limited to Type B dwelling and sleeping units.~~

**~~SECTION 806 ACCESSIBILITY~~**

~~**806.1 General.** A building, *facility*, or element that is altered shall comply with this section and Section 705.~~

~~**806.2 Stairways and escalators in existing buildings.** In *alterations* where an escalator or stairway is added where none existed previously, an accessible route shall be provided in accordance with Sections 1104.4 and 1104.5 of the *International Building Code*.~~

**~~SECTION 906 ACCESSIBILITY~~**

~~**906.1 General.** A building, *facility* or element that is altered shall comply with this section and Sections 705 and 806.~~

~~**906.2 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered.~~

~~**Exception:** Group I-1, I-2, R-2, R-3 and R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 15, 1991 are not required to provide Type B dwelling or sleeping units.~~

## **~~SECTION 1006 ACCESSIBILITY~~**

**~~1006.1 General.~~** Accessibility in portions of buildings undergoing a *change of occupancy* classification shall comply with Section 1012.8.

**~~1012.1.4 Accessibility.~~** All buildings undergoing a change of occupancy classification shall comply with Section 1012.8.

**~~1012.8 Accessibility.~~** *Existing buildings* that undergo a change of group or occupancy classification shall comply with this section.

**~~Exception:~~** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing buildings and facilities undergoing a *change of occupancy* in conjunction with less than a Level 3 *alteration*.

**~~1012.8.1 Partial change in occupancy.~~** Where a portion of the building is changed to a new occupancy classification, any *alteration* shall comply with Sections 705, 806 and 906, as applicable.

**~~1012.8.2 Complete change of occupancy.~~** Where an entire building undergoes a *change of occupancy*, it shall comply with Section 1012.8.1 and shall have all of the following accessible features:

- ~~1. At least one accessible building entrance.~~
- ~~2. At least one accessible route from an accessible building entrance to *primary function* areas.~~
- ~~3. Signage complying with Section 1111 of the *International Building Code*.~~
- ~~4. Accessible parking, where parking is provided.~~
- ~~5. At least one accessible passenger loading zone, where loading zones are provided.~~
- ~~6. At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.~~

Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy, the above items shall conform to the requirements to the maximum extent technically feasible.

**~~Exception:~~** The accessible features listed in Items 1 through 6 are not required for an accessible route to Type B units.

## **~~SECTION 1105 ACCESSIBILITY~~**

**~~1105.1 Minimum requirements.~~** Accessibility provisions for new construction shall apply to additions. An addition that affects the accessibility to, or contains an area of, *primary function* shall comply with the requirements of Sections 705, 806 and 906, as applicable.

**~~1105.2 Accessible dwelling units and sleeping units.~~** Where Group I-1, I-2, I-3, R-1, R-2 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for accessible units apply only to the quantity of spaces being added.

**~~1105.3 Type A dwelling or sleeping units.~~** Where more than 20 Group R-2 dwelling or sleeping units are being added, the requirements of Section

~~1107 of the *International Building Code* for Type A units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being added.~~

~~**1105.4 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of spaces being added.~~

## ~~CHAPTER 12 HISTORIC BUILDINGS~~

### ~~SECTION 1204 ALTERATIONS~~

~~**1204.1 Accessibility requirements.** The provisions of Sections 705, 806 and 906, as applicable, shall apply to facilities designated as historic structures that undergo *alterations*, unless *technically infeasible*. Where compliance with the requirements for accessible routes, entrances or toilet rooms would threaten or destroy the historic significance of the building or *facility*, as determined by the *code official*, the alternative requirements of Sections 1204.1.1 through 1204.1.4 for that element shall be permitted.~~

~~**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in historical buildings.~~

~~**1204.1.1 Site arrival points.** At least one accessible route from a site arrival point to an *accessible* entrance shall be provided.~~

~~**1204.1.2 Multilevel buildings and facilities.** An accessible route from an accessible entrance to public spaces on the level of the accessible entrance shall be provided.~~

~~**1204.1.3 Entrances.** At least one main entrance shall be accessible.~~

~~**Exceptions:**~~

- ~~1. If a main entrance cannot be made accessible, an accessible nonpublic entrance that is unlocked while the building is occupied shall be provided; or~~
- ~~2. If a main entrance cannot be made accessible, a locked accessible entrance with a notification system or remote monitoring shall be provided.~~

~~**1204.1.4 Toilet and bathing facilities.** Where toilet rooms are provided, at least one accessible family or assisted use toilet room complying with Section 1109.2.1 of the *International Building Code* shall be provided.~~

~~**1205.15 Accessibility requirements.** The provisions of Section 1012.8 shall apply to facilities designated as historic structures that undergo a *change of occupancy*, unless *technically infeasible*. Where compliance with the requirements for accessible routes, ramps, entrances, or toilet rooms would threaten or destroy the historic significance of the building or *facility*, as determined by the authority having jurisdiction, the alternative requirements of Sections 1204.1.1 through 1204.1.4 for those elements shall be permitted~~

~~**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be~~

~~provided in historical buildings.~~

~~**1401.2.5 Accessibility requirements.** Accessibility shall be provided in accordance with Section 410 or 605.~~

## **SECTION 410 ACCESSIBILITY FOR EXISTING BUILDINGS**

**Reason:** This change is written to move all of the accessibility requirements into a single section in new IEBC Section 303. New 303 is editorial with no change in criteria or requirements and simply renumbers Section 410 to Section 303. All accessibility requirements for existing buildings are placed in one section (303) allowing a focused and clear set of requirements for users to understand. In the existing IEBC, two of the three compliance methods (prescriptive and work area methods) have provisions for accessibility that are virtually identical. In addition, the existing performance method refers to the accessibility provisions of the other compliance methods.

The intent of this change is a reorganization of accessibility provisions to avoid duplication of the same requirements in multiple code sections. The text of requirements is relocated, but the content of the moved sections is not changed. There is no intent to change code requirements, only to recognize them. Note that Section 303.8.9 addressing dining areas is included only because that section has not yet been deleted from Chapter 7 as it was in current Section 410.

The identical provisions in all subsequent sections have been deleted. We understand that there are several proposals from BCAC to coordinate the provisions between Chapter 4 and 7. Our intent is that those proposals would be incorporated into the change. This move is editorial only.

**Cost Impact:** Will not increase the cost of construction  
This change simply consolidate the various criteria in the IEBC, and should not change the cost of construction.

EB33-15 : 410-  
COLLINS4528

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### **Public Hearing Results**

**Committee Action:**

**Approved as Submitted**

**Committee Reason:** Though this proposal was viewed as a shift from the format of the IEBC it was felt for consistency purposes that the accessibility provisions should be located in one location within Chapter 3. The provisions are meant to apply equally to all methods.

**Assembly Motion:**

**Disapprove**

**Online Vote Results:**

**Failed**

Support: 36.31% (61) Oppose: 63.69% (107)

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : David Bonowitz, David Bonowitz, S.E., representing Existing Buildings Committee, National Council of Structural Engineers Associations (dbonowitz@att.net) requests**

## **Disapprove.**

**Commenter's Reason:** It turns out that EB 33, contrary to the proponents' reason statement and testimony at the hearings, makes several unintended substantive changes to accessibility provisions. These points did not come up at the hearings. EB33 is quite complicated -- it deletes, it renumbers, it relocates, it recombines, it slices and dices -- so much so that in the little time available at the hearings the committee was forced to take the word of the proponents that the proposal is entirely editorial. Upon further review, at least three substantive provisions will be changed if EB33 is approved.

1. IEBC 806.2 requires an accessible route when a stair or escalator is added. EB 33 replaces this provision with 303.8.4 (current 410.8.4), which has an additional trigger for "major structural modifications," whatever those are. Thus EB 33 changes the code, contrary to its claim, replacing a clear, thoughtful provision with an unclear, obsolete, and unenforceable one.

2. IEBC 906.2 has an Exception, added in 2015. EB 33 replaces that section with the second half of 303.8.8 (current 410.8.8) which does not have the exception. Thus, EB 33 changes the content of the code and undoes a change just made in 2015.

3. IEBC 705.1.1 sensibly does not require a new accessible entrance for most Level 1 Alterations. EB 33, however, makes no distinction between alteration levels, thus dismissing one of the key features of the IEBC. As a result, it replaces this sensible provision with 303.8.1 (current 410.8.1) which requires that a new accessible entrance must be provided with almost ANY alteration. Under EB 33, if I just want to reroof my building, renovate part of the exterior cladding, or mitigate some seismic falling hazards, I will be required to provide a new accessible entrance that Chapter 7 did not require.

Are there more examples of things the proponents missed? Who knows. But even these basic examples make clear that the current accessibility provisions are NOT "virtually identical," as proponents claim.

Just as important, in consolidating the disability provisions, the proponents have decided to reject the clearer and better maintained language and organization of the Work Area method, and instead revert to the confusing and contradictory language remaining in the prescriptive method (current sections 410.7 and 410.8, for example).

The worst part is that EB 33 is not even necessary. The duplication cited by the proponents is actually duplication only in the eyes of an editor. Yes, some of the same or similar words occur in more than one place in the code, but the code user won't see them that way. Once you pick a compliance method, and identify your project type, you only use the applicable code chapter, so if the same words appear in another chapter, who cares?

Meanwhile, even while approving EB 33, the committee acknowledged that it fundamentally changes the organization and philosophy of the IEBC. If the problems EB 33 is meant to solve were real problems, a "shift" in the format (as the committee calls it) might be worthwhile. But as shown here, the problem is not real, the benefits are thus illusory, and the implementation ends up making surprising substantive changes and leaving the IEBC user with obsolete and confusing provisions.

**Staff Note:** A series of code changes were proposed for coordination of the accessibility requirements between the prescriptive method and work area method. Please consult the Code Change Monograph and the Report of Committee Action Hearing on this code change proposal and code change proposals EB35, EB40, EB41, EB42, EB43, EB44, EB45, EB47, EB56 and EB65.

## ***Public Comment 2:***

**Proponent : Steven McDaniel, representing New York State**

## **Building Officials Conference requests Disapprove.**

**Commenter's Reason:** Because the IEBC contains several compliance methods there is a need to have a "Guidance" chapter. That chapter is Chapter 3, this is the chapter that directs you to where you need to go for the compliance path that you choose. This Chapter does not contain any regulatory language, so adding accessibility requirements here is problematic. The IEBC is set up in "Project Based" Chapters for compliance. This code change now adds "Discipline Based" language to this Chapter.

We Strongly urge Disapproval of this code change.

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EB33-15



# EB35-15

410.2, 705.1, 1508.2 (New)

## Proposed Change as Submitted

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

### 2015 International Existing Building Code

#### Revise as follows:

**410.2 Maintenance of facilities.** A *facility* that is constructed or altered to be *accessible* shall be maintained *accessible* during occupancy to the maximum extent feasible.

**705.1 General.** A *facility* that is altered shall comply with the applicable provisions in Sections 705.1.1 through 705.1.14, and Chapter 11 of the *International Building Code* unless it is *technically infeasible*. Where compliance with this section is *technically infeasible*, the alteration shall provide access- comply with these requirements to the maximum extent that is technically feasible.

~~A *facility* that is constructed or altered to be accessible shall be maintained accessible during occupancy.~~

#### Exceptions:

1. The altered element or space is not required to be on an accessible route unless required by Section 705.2.
2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing *facilities*.
3. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing *facilities* undergoing less than a Level 3 *alteration*.
4. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall meet the provisions for Type B dwelling units.

#### Add new text as follows:

**1508.2 During construction.** A facility that is constructed or altered to be accessible shall be maintained accessible during occupancy to the maximum extent feasible.

**Reason:** There is a series of proposals intended to coordinate the provisions in the first and second options in the IEBC. Requirements for maintenance of facilities during construction in Sections 410.2 and 705.1 should match. However, it was also felt that maintenance of facilities during construction would be more appropriately located under Chapter 15, Construction Safeguards. Maintenance/repairs to maintain accessibility is already addressed in Section 605.1.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under

the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction  
The proposal is a clarification and coordination of current requirements; therefore, there is no impact on the cost.

EB35-15 : 410.2-  
KULIK3344

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## **Public Hearing Results**

**Committee Action:** **Disapproved**

**Committee Reason:** There was concern that the phrase "maximum extent feasible" would create too large of a loophole for compliance.

**Assembly Action :** **None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee ([bcac@iccsafe.org](mailto:bcac@iccsafe.org)) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**410.2 Maintenance of facilities.** A *facility* that is constructed or altered to be *accessible* shall be maintained *accessible* during occupancy to the maximum extent that is technically feasible.

**705.1 General.** A *facility* that is altered shall comply with the applicable provisions in Sections 705.1.1 through 705.1.14, and Chapter 11 of the *International Building Code* unless it is *technically infeasible*. Where compliance with this section is *technically infeasible*, the alteration shall comply with these requirements to the maximum extent that is technically feasible. A facility that is constructed or altered to be accessible shall be maintained accessible during occupancy to the maximum extent that is technically feasible.

**Exceptions:**

1. The altered element or space is not required to be on an accessible route unless required by Section 705.2.
2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing *facilities*.
3. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing *facilities* undergoing less than a Level 3 *alteration*.
4. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall meet the provisions for Type B dwelling units.

~~**1508.2 During construction.** A facility that is constructed or altered to be accessible shall be maintained accessible during occupancy to the maximum extent feasible.~~

**Commenter's Reason:** The ICC Building Code Action Committee requests approval of this public comment. The committee was concerned that the phrase "maximum extent feasible" could create a loophole. The revised proposal uses the term "technically infeasible" which is a defined term and consistent with the ADA Standards and places it in both Sections 410.2 and 705.1. The proposal will no longer contain the move of the language from 705.1 to new Section 1508.2, but will keep the existing language.

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EB35-15

# EB37-15

## 410.4.1, 410.4.2, 1012.8.1, 1012.8.2

### Proposed Change as Submitted

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## 2015 International Existing Building Code

### Revise as follows:

**410.4 Change of occupancy.** *Existing buildings* that undergo a change of group or occupancy shall comply with this section.

**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in *existing buildings* and facilities undergoing a *change of occupancy* in conjunction with *alterations* where the *work area* is 50 percent or less of the aggregate area of the building.

**410.4.1 Partial change in occupancy.** Where a portion of the building is changed to a new occupancy classification or the building has an aggregate area of not more than 3,000 square feet (278.7 m<sup>2</sup>), any *alterations* shall comply with Sections 410.6, 410.7 and 410.8.

**410.4.2 Complete change of occupancy.** Where an entire building undergoes a *change of occupancy* and has an aggregate are of more than 3,000 square feet (278.7 m<sup>2</sup>), it shall comply with Section 410.4.1 and shall have all of the following accessible features:

1. At least one accessible building entrance.
2. At least one accessible route from an accessible building entrance to *primary function* areas.
3. Signage complying with Section 1111 of the *International Building Code*.
4. Accessible parking, where parking is being provided.
5. At least one accessible passenger loading zone, when loading zones are provided.
6. At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.

Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy, the above items shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible features listed in Items 1 through 6 are not required for an accessible route to Type B units.

**1012.8 Accessibility.** *Existing buildings* that undergo a change of group or occupancy classification shall comply with this section.

**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing buildings and facilities undergoing a *change of occupancy* in conjunction with less than a Level 3 *alteration*.

**1012.8.1 Partial change in occupancy.** Where a portion of the building is changed to a new occupancy classification or the building has an aggregate area of not more than 3,000 square feet (278.7 m<sup>2</sup>), any *alteration* shall comply with Sections 705, 806 and 906, as applicable.

**1012.8.2 Complete change of occupancy.** Where an entire building undergoes a *change of occupancy* and has an aggregate area of more than 3,000 square feet (278.7 m<sup>2</sup>), it shall comply with Section 1012.8.1 and shall have all of the following accessible features:

1. At least one accessible building entrance.
2. At least one accessible route from an accessible building entrance to *primary function* areas.
3. Signage complying with Section 1111 of the *International Building Code* .
4. Accessible parking, where parking is provided.
5. At least one accessible passenger loading zone, where loading zones are provided.
6. At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.

Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy, the above items shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible features listed in Items 1 through 6 are not required for an accessible route to Type B units.

**Reason:** The current provisions for a complete change of occupancy is sometimes very difficult or costly for small facilities undergoing a complete change of occupancy. The 3,000 sq.ft. limit proposed is consistent with Live/work units. These small facilities will have the same accessibility requirements, regardless if the alteration is a change of occupancy or not. Changes of occupancy are probably more likely to include alterations, so a small facility would be looking at improvements to the accessible route up to the 20% cost limitation. The larger facilities will still have to provide an accessible route when the entire facility undergoes a complete change of occupancy.

The current list of 6 items can be read to require an accessible route, including an elevator, regardless of the cost of the items and how much is spent on any alterations. For the small building, this can result in an existing building being so expensive to fix that it cannot be used for anything other than its original purpose.

What is currently proposed for small buildings is similar to what is allowed for historic buildings in Section 410.9, 1204.1 and 1205.15.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC).

The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction  
As indicated in the reason, this would be a possible reduction in cost for small buildings undergoing a complete change in occupancy.

EB37-15 : 410.4.1-  
KULIK3363

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** Though there was some merit to having a benchmark there was concern with origination of 3000 square feet. Additionally, the wording proposed was felt to be somewhat awkward.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by this Public Comment.**

**Replace Proposal as Follows:**

### **2015 International Existing Building Code**

**410.4 Change of occupancy.** ~~Existing~~ *Where existing buildings that* undergo a change of group or occupancy any alterations shall comply with Sections 410.6, 410.7 and 410.8 as applicable. ~~this section.~~

~~**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in *existing buildings* and facilities undergoing a *change of occupancy* in conjunction with *alterations* where the *work area* is 50 percent or less of the aggregate area of the building.~~

~~**410.4.1 Partial change in occupancy.** Where a portion of the building is changed to a new occupancy classification, any *alterations* shall comply with Sections 410.6, 410.7 and 410.8.~~

~~**410.4.2 Complete change of occupancy.** Where an entire building undergoes a *change of occupancy*, it shall comply with Section 410.4.1 and shall have all of the following accessible features:~~

1. ~~At least one accessible building entrance.~~
2. ~~At least one accessible route from an accessible building entrance to *primary function* areas.~~
3. ~~Signage complying with Section 1111 of the *International Building Code*.~~
4. ~~Accessible parking, where parking is being provided.~~
5. ~~At least one accessible passenger loading zone, when loading zones are provided.~~
6. ~~At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.~~

~~Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy, the above items shall conform to the requirements to the maximum extent technically feasible.~~

~~**Exception:** The accessible features listed in Items 1 through 6 are not required for an accessible route to Type B units.~~

**1012.8 Accessibility. Existing** ~~*Where existing buildings* that undergo a change of group or occupancy classification any alterations shall comply with Sections 705, 806 and 906, as applicable.~~ ~~this section.~~

~~**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing buildings and facilities undergoing a *change of occupancy* in conjunction with less than a Level 3 alteration.~~

•

**1012.8.1 Partial change in occupancy.** ~~Where a portion of the building is changed to a new occupancy classification, any *alteration* shall comply with Sections 705, 806 and 906, as applicable.~~

**1012.8.2 Complete change of occupancy.** ~~Where an entire building undergoes a *change of occupancy*, it shall comply with Section 1012.8.1 and shall have all of the following accessible features:~~

1. ~~At least one accessible building entrance.~~
2. ~~At least one accessible route from an accessible building entrance to *primary function* areas.~~
3. ~~Signage complying with Section 1111 of the *International Building Code*.~~
4. ~~Accessible parking, where parking is provided.~~
5. ~~At least one accessible passenger loading zone, where loading zones are provided.~~
6. ~~At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.~~

~~Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy, the above items shall conform to the requirements to the maximum extent technically feasible.~~

~~**Exception:** The accessible features listed in Items 1 through 6 are not required for an accessible route to Type B units.~~

**Commenter's Reason:** The ICC Building Code Action Committee requests approval of this public comment.

The MOE Development Committee did not agree with the 3,000 sq.ft. limit for a change of occupancy. In the original proposal, the 3,000 sq.ft. was intended as a compromise limit between when the list of 6 items in Section 410.4.2 was mandatory. Since large building undergoing a change of occupancy typically include alteration, BCAC is suggesting that maybe a compromise limit is not needed. A change of occupancy should be handled the same as any alteration for an existing building. After all, there is no technical or logical justification to ask more from a business changing to a mercantile than you would ask from a business staying as a business.

The current list of 6 items can be read to require an accessible route, including a significant ramp, a platform lift, or an elevator, regardless of the cost of the items and how much is spent on any alterations. For the small building, this can result in an existing building being so expensive to fix that it cannot be used for anything other than its original purpose. It is logical to allow all buildings to improve accessibility as they alter. Existing buildings will become accessible over time. This is consistent with the provisions in the ADA which does not address changes in occupancy, just alterations.

The exceptions for Type B units are not needed because the same exceptions are included in the referenced sections (410.6, Exception 4, 410.7, Exception 5, 705.1, Exception 3 and 705.2, Exception 5).

Changes to Sections 410 and 1012 will create consistency between the different options in the IEBC

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**EB37-15**



# EB38-15

## 410.4.2, 1012.8.2

### Proposed Change as Submitted

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## 2015 International Existing Building Code

Revise as follows:

**410.4.2 Complete change of occupancy.** Where an entire building undergoes a *change of occupancy*, it shall comply with Section 410.4.1 and shall have at least one accessible route throughout the building.~~all of the following accessible features:~~

- ~~1. At least one accessible building entrance.~~
- ~~2. At least one accessible route from an accessible building entrance to primary function areas.~~
- ~~3. Signage complying with Section 1111 of the *International Building Code*.~~
- ~~4. Accessible parking, where parking is being provided.~~
- ~~5. At least one accessible passenger loading zone, when loading zones are provided.~~
- ~~6. At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.~~

Where it is *technically infeasible* to comply with the new construction standards for any of these requirements for a change of group or occupancy an accessible route, the ~~above items~~ accessible route shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible features listed in Items 1 through 6 are route is not required for an accessible route to Type B units required by Section 410.8.8.

**1012.8.2 Complete change of occupancy.** Where an entire building undergoes a *change of occupancy*, it shall comply with Section 1012.8.1 and shall have at least one accessible route throughout the building.~~all of the following accessible features:~~

- ~~1. At least one accessible building entrance.~~
- ~~2. At least one accessible route from an accessible building entrance to primary function areas.~~
- ~~3. Signage complying with Section 1111 of the *International Building Code*.~~
- ~~4. Accessible parking, where parking is being provided.~~
- ~~5. At least one accessible passenger loading zone, when loading zones are provided.~~
- ~~6. At least one accessible route connecting accessible parking and accessible passenger loading zones to an accessible entrance.~~

Where it is ~~technically infeasible~~ to comply with the new construction standards for ~~any of these requirements for a change of group or occupancy~~ an accessible route, the ~~above items~~ accessible route shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible features listed in ~~Items 1 through 6~~ route is not required for an accessible route to Type B units required by Section 906.2 and 1105.4.

**Reason:** The intent of this proposal is to clarify what is expected when a building undergoes a complete change of occupancy, regardless if it has alterations or not. The list of six items is basically describing the items on an accessible route. Stating it simply will increase understanding of the requirement. This should also eliminate the question as to if this list is intended to over ride new construction exceptions for percentages of accessible entrances or where an elevator is not required. It was never intended to ask for an existing building to exceed new construction requirements.

There is a wide variety of interpretations for the list of 6 items in Section 410.4.2 and 1202.8.2. This list was originally from a draft of the new ADAAG during development. This was a list of priority items for accessible routes that ended up not being included in ADA. It was decided that designers should be able to use the money where there was the best advantage with the goal of existing buildings become as accessible as feasible over time. In addition, ADA does not address a change in occupancy; the 2010 ADA standard treats alterations the same, change of occupancy or not.

Toilet rooms and drinking fountains are not in the current list. These items would require improvements for accessibility if the complete change of occupancy also included alterations to a primary function area in accordance with Sections 410.7 and 705.2.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

The proposal is a clarification of current requirements; therefore, there is no impact on the cost.

EB38-15 : 410.4.2-  
KULIK3402

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The proposal was disapproved based upon concerns that the

revised language expands the requirements too broadly. In addition, it was felt that this expansion would significantly increase cost of construction

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

#### **410.4.2 Complete change of occupancy.**

Where an entire building undergoes a *change of occupancy*, it shall comply with Section 410.4.1 and shall have at least one accessible route ~~throughout the building.~~ to primary function areas.

Where it is *technically infeasible* to comply with the new construction standards for an accessible route, the accessible route shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible route is not required to Type B units required by Section 410.8.8.

#### **1012.8.2 Complete change of occupancy.**

Where an entire building undergoes a *change of occupancy*, it shall comply with Section 1012.8.1 and shall have at least one accessible route ~~throughout the building.~~ to primary function areas.

Where it is *technically infeasible* to comply with the new construction standards for an accessible route, the accessible route shall conform to the requirements to the maximum extent technically feasible.

**Exception:** The accessible route is not required to Type B units required by Section 906.2 and 1105.4.

**Commenter's Reason:** The ICC Building Code Action Committee requests approval of this public comment. The list of 6 items was originally a priority list for accessible route requirements. While no longer a priority list, the requirements in the list are not interpreted or enforced consistently. Therefore, this language should be removed from the code.

The change to 'primary function areas' versus 'throughout the building' is to address concerns brought up during testimony. Testimony stated that bathrooms and drinking fountains were being added to the list, but since these elements are not referenced here as they are in Sections 410.7 and 705.2, this is not the case. Also, these elements are specifically excluded in the definition of 'primary function'. There was also concern that 'throughout the building' would include any closets and every corner. By changing the phrase to 'primary function areas' that would be consistent with alterations for where accessible routes would be required. Existing Sections 410.3 and 705.1.13 would allow for a building to not exceed new construction requirements.

This is meant as a clarification, not an expansion of scope so there should be no increase in the cost of construction.



# EB42-15

## 410.8.6, 410.8.7, 410.8.8

### Proposed Change as Submitted

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## 2015 International Existing Building Code

### Revise as follows:

**410.8.6 Accessible dwelling or sleeping units.** Where Group I-1, I-2, I-3, R-1, R-2 or R-4 dwelling or sleeping units are being altered or added, the requirements of Section 1107 of the *International Building Code* for Accessible units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of spaces being altered or added.

**410.8.7 Type A dwelling or sleeping units.** Where more than 20 Group R-2 dwelling or sleeping units are being altered or added, the requirements of Section 1107 of the *International Building Code* for Type A units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered or added.

**410.8.8 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units apply only to the quantity of the spaces being added. Where Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered and where the work area is greater than 50 percent of the aggregate area of the building, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *Internatinoal Buidling Code* for visible alarms apply only to the quantity of the spaces being altered.

**Reason:** There is a series of proposals intended to coordinate the provisions in the first and second options in the IEBC. This phrase was deleted from Sections 410.8.7, 410.8.8 and 410.8.9 by code change G215-07/08. The reason given was that when visible alarms are required to be added or altered is addressed in IBC/IFC Chapter 9. However, in Chapter 9, if a system is touched, the whole building system needs to be upgraded. This would limit the change to just the units being altered.

ALTERATIONS - LEVEL 1

**705.1.8 Type A dwelling or sleeping units.** Where more than 20 Group R-2 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type A units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered.

ALTERATIONS - LEVEL 3

**906.2 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered.

**Exception:** Group I-1, I-2, R-2, R-3 and R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 15, 1991 are not

required to provide Type B dwelling or sleeping units.

#### ADDITION

**1105.3 Type A dwelling or sleeping units.** Where more than 20 Group R-2 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type A units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being added.

**1105.4 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of spaces being added.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction  
The proposal limits the revisions to the fire alarm system. Therefore, there will be no additional costs to construction.

EB42-15 : 410.8.6-  
KULIK3350

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### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** There was concern with how this proposal would work with the exception to Section 907.5.2.3 of the IBC and IFC. More specifically, the concern was that visible alarms would potentially be required by this proposal where not required by the IBC or IFC.

**Assembly Motion:**

**As Submitted**

**Online Vote Results:**

**Failed**

Support: 35.03% (55) Oppose: 64.97% (102)

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by**

**this Public Comment.**

**Replace Proposal as Follows:**

**2015 International Existing Building Code**

**705.1.8 Type A dwelling or sleeping units.** Where more than 20 Group R-2 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type A units ~~and Chapter 9 of the *International Building Code* for visible alarms~~ apply only to the quantity of the spaces being altered.

**906.2 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type B units ~~and Chapter 9 of the *International Building Code* for visible alarms~~ apply only to the quantity of the spaces being altered.

**Exception:** Group I-1, I-2, R-2, R-3 and R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 15, 1991 are not required to provide Type B dwelling or sleeping units.

**1105.3 Type A dwelling or sleeping units.** Where more than 20 Group R-2 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type A units ~~and Chapter 9 of the *International Building Code* for visible alarms~~ apply only to the quantity of the spaces being added.

**1105.4 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units ~~and Chapter 9 of the *International Building Code* for visible alarms~~ apply only to the quantity of spaces being added.

**Commenter's Reason:** The ICC Building Code Action Committee is requesting approval of this public comment. The IEBC Development Committee felt that inserting this language would override the alarm requirements in the IFC. This was not the intent. The proposal was for coordination between the prescriptive and work area methods in the IEBC. This modification is to strike the same language from the work area method.

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EB42-15

# EB43-15

## 410.8.8, 410.8.9 (New)

### Proposed Change as Submitted

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## 2015 International Existing Building Code

### Revise as follows:

#### **410.8.8 Additions with Type B dwelling or sleeping units.**

Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units apply only to the quantity of the spaces being added.

**410.8.9 Alterations with Type B dwelling and sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered and where the work area is greater than 50 percent of the aggregate area of the building, the requirements of Section 1107 of the International Building Code for Type B units apply only to the quantity of the spaces being altered.

**Reason:** There is a series of proposals intended to coordinate the provisions in the first and second options in the IEBC. Section 410.8.8 is being split to separate additions and alterations. This is a clarification that is consistent with Sections 906.2, 1012.8 and 1105.4.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

The proposal is a clarification and coordination of current requirements; therefore, there is no impact on the cost.

EB43-15 : 410.8.8-  
KULIK3358

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## Public Hearing Results



**Committee Action:****Disapproved**

**Committee Reason:** This proposal was disapproved based primarily on the preference to code change proposal EB44-15 and concern with the change to "four or more" where it had simply been based upon any number of units being altered. EB44-15 was also disapproved.

**Assembly Action :****None**

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**Individual Consideration Agenda*****Public Comment 1:***

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Submitted.**

**Commenter's Reason:** The ICC Building Code Action Committee requests approval of this proposal as submitted. The IEBC Development committee stated they preferred EB44, but then disapproved EB44. The issue between EB 44 and EB65 was regarding the difference in the exception between the prescriptive and work area methods. This issue was resolved by AS for EB65. The purpose of this proposal is just to split the requirements for Type B units in the prescriptive method to match the text as shown in the work area method (Section 906.2, 1012.8 and 1105.4). This is editorial only.

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**EB43-15**

# EB44-15

## 410.8.8

### **Proposed Change as Submitted**

**Proponent :** Dan Buuck, National Association of Home Builders, representing National Association of Home Builders (dbuuck@nahb.org)

## **2015 International Existing Building Code**

**Revise as follows:**

**410.8.8 Additions with Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units apply only to the quantity of the spaces being added.

**410.8.9 Alterations with Type B dwelling and sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered and where the work area is greater than 50 percent of the aggregate area of the building, the requirements of Section 1107 of the International Building Code for Type B units apply only to the quantity of the spaces being altered.

**Exception:** Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 15, 1991 are not required to provide Type B dwelling or sleeping units.

**Reason:** Section 410.8.8 is being split to separate additions and alterations (similar to Section 906.2 and 1105.4). The addition of the exception to Section 410.8.9 is to coordinate with Section 906.2. The intent is to coordinate the requirements for Type B dwelling units within the options available in the IEBC.

This same exception was added to Section 906.2 during the last code cycle to bring it in line with the provisions of FHA. It was approved by the committee and had no public comments. This proposal fixes the unintended omission of the same language in Section 410.8.9. These provisions need to include similar language, because they are parallel sections.

Having this language in the IEBC allows buildings that were previously occupied to be revitalized without triggering requirements that would exceed the federal legislation. Too often existing building owners who submit plans to alter an existing residential building which was built before the FHA guidelines went into effect are told that they must comply with the accessible requirements for new buildings. This exception brings the IEBC in line with the federal guidelines.

For reference, FHA regulations state "The design requirements apply to buildings built for first occupancy after March 13, 1991, which fall under the definition of "covered multifamily dwellings."

Sections 906.2 and 1105.4 are shown below for comparison:

**906.2 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the International Building Code for Type B units and Chapter 9 of the International Building Code for visible alarms apply only to the quantity of the spaces being altered.

**Exception:** Group I-1, I-2, R-2, R-3 and R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 15, 1991 are not required to provide Type B dwelling or sleeping units.

**1105.4 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of

Section 1107 of the International Building Code for Type B units and Chapter 9 of the International Building Code for visible alarms apply only to the quantity of spaces being added.

**Cost Impact:** Will not increase the cost of construction

This proposal limits the Type B units requirements to only buildings that should have complied with the Fair Housing Act at the time of initial construction. Therefore, older institutional and residential buildings would not have the additional costs of upgrading for accessibility.

EB44-15 : 410.8.8-  
BUUCK4900

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The concern with this proposal is allowing the same exception in the prescriptive method as work area method. The change was seen as too significant. There was also concern with determining the dates when a change of occupancy was issued.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Dan Buuck, representing National Association of Home Builders (dbuuck@nahb.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**410.8.8 Additions with Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for Type B units apply only to the quantity of the spaces being added.

**410.8.9 Alterations with Type B dwelling and sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered and where the work area is greater than 50 percent of the aggregate area of the building, the requirements of Section 1107 of the International Building Code for Type B units apply only to the quantity of the spaces being altered.

**Exception:** Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March ~~15~~ 14, 1991 are not required to provide Type B dwelling or sleeping units.

**Commenter's Reason:** The purpose of the proposed exception is to align the code with the Fair Housing Act. For reference, FHA regulations state "The design requirements apply to buildings built for first occupancy after March 13, 1991, which fall under the definition of "covered multifamily dwellings."

The committee reason states a concern that this exception would be included in the prescriptive method AND the work area method, as if that was problematic. Actually this exception should apply to both instances, because that would align both methods with the FHA and avoid confusion.

The second reason which the committee discussed was that determining when the certificate of occupancy was issued. This is not as big of a challenge as some made it out to be. The vast majority of counties have this information available if the Department of Building Safety doesn't. Most areas of a town or city fall into certain decades of construction anyway, making it clear that a house was occupied long before (or after) the cut-off date.

Note the only modification made to the original proposal was a minor adjustment to the date in order to bring it fully in line with the FHA provision. See the similar public comment for EB 65-15.

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**EB44-15**

# EB46-15

410.8.10, 410.9.4, 705.1.9, 1204.1.4

## Proposed Change as Submitted

**Proponent :** Gene Boecker, representing Code Consultants, Inc.  
(geneb@codeconsultants.com)

### 2015 International Existing Building Code

Revise as follows:

**410.8.10 Toilet rooms.** Where it is *technically infeasible* to alter existing toilet and bathing rooms to be *accessible*, a unisex toilet room or bathing room shall be provided. The unisex toilet room or bathing room shall be constructed as an accessible family or assisted-use toilet or bathing room constructed in accordance with Section ~~1109.2.1~~ 1109.2.1.2, 1109.2.1.3, 1109.2.1.5, 1109.2.1.6 and 1109.2.1.7 of the *International Building Code*. is A unisex toilet room shall be permitted to contain two water closets. The ~~family or assisted-use~~ unisex toilet or bathing room shall be located on the same floor and in the same area as the existing toilet or bathing rooms. At the inaccessible toilet and bathing rooms, ~~provide~~ directional signs shall be provided indicating the location of the nearest ~~family or assisted-use~~ unisex toilet room or bathing room. These directional signs shall include the International Symbol of Accessibility and sign characters shall meet the visual character requirements in accordance with ICC A117.1.

**410.9.4 Toilet and bathing facilities.** Where toilet rooms are provided, at least one unisex toilet shall be provided. The unisex toilet room shall be constructed as an accessible family or assisted-use toilet room complying with Section ~~1109.2.1~~ Sections 1109.2.1.2, 1109.2.1.5, 1109.2.1.6 and 1109.2.1.7 of the *International Building Code*. A unisex toilet room shall be provided permitted to contain two water closets.

**705.1.9 Toilet rooms.** Where it is technically infeasible to alter existing toilet and bathing rooms to be accessible, a unisex toilet room or bathing room shall be provided. The unisex toilet room or bathing room shall be constructed as an accessible family or assisted-use toilet or bathing room constructed in accordance with Section ~~1109.2.1~~ 1109.2.1.2, 1109.2.1.3, 1109.2.1.5, 1109.2.1.6 and 1109.2.1.7 of the *International Building Code*. is A unisex toilet room shall be permitted to contain two water closets. The ~~family or assisted-use~~ unisex toilet or bathing room shall be located on the same floor and in the same area as the existing toilet or bathing rooms. At the inaccessible toilet and bathing rooms, directional signs indicating the location of the nearest family or assisted-use unisex toilet room or bathing room shall be provided. These directional signs shall include the International Symbol of Accessibility and sign characters shall meet the visual character requirements in accordance with ICC A117.1.

**1204.1.4 Toilet and bathing facilities.** Where toilet rooms are provided, at least one unisex toilet shall be provided. The unisex toilet room shall be constructed as an accessible family or assisted-use toilet room complying with Section ~~1109.2.1~~ Sections 1109.2.1.2, 1109.2.1.5, 1109.2.1.6 and 1109.2.1.7 of the *International Building Code*. A unisex toilet room shall be provided permitted to contain two water closets.

**Reason:** The proposals to Sections 410.9.4 and 705.1.9 are for altered buildings and are exactly the same. The proposals to Section 410.9.4 and 1204.1.4 are for historic buildings, and are the same. The code change seeks to address all in the same manner.

The concept of the alternative toilet/bathing room has been confused between the IBC's intent to provide additional access and usability in the family and assisted-use toilet and bathing rooms; and, the unisex toilet/bathing rooms intended to provide some accessibility where none would otherwise be available. The former is intended to be required only in mercantile and assembly occupancies where other accessible group toilet/bathing rooms are provided. The latter is intended to provide at least one accessible set of plumbing fixtures in an existing building where no other accessible plumbing fixtures are provided. One is for new construction and one is for existing construction. These are different needs and should be identified as such and given different names accordingly.

It would be easy to simply have a "one size fits all" approach to both of these. However, the federal 2010 ADA Standards for Accessible Design includes different fixtures within the room than what is included in the IBC. Both sets of rules allow two options for the toilet room fixture counts and two for the bathing room fixture counts:

	IBC Family or Assisted Use Toilet and Bathing Rooms (current)			
	Toilet Room A	Toilet Room B	Bathing Room A	Bathing Room B
Lavatory	1	1	1	1
Water Closet	1	1	1	1
Urinal	0	1	0	0
Shower	n/a	n/a	1	0
Bathtub	n/a	n/a	0	1

In some cases the two sets of rules align. In others they do not. These proposed changes would place the IBC unisex toilet/bathing rooms in line with the provisions of the 2010 Standards for unisex toilet/bathing rooms.

The 2010 ADA Standards for Accessible Design:

Section 213.2 identifies, in exceptions 1 and 2 when the unisex toilet room is required.

**213.2 Toilet Rooms and Bathing Rooms.** Where toilet rooms are provided, each toilet room shall comply with 603. Where bathing rooms are provided, each bathing room shall comply with 603.

**EXCEPTIONS:** 1. In alterations where it is technically infeasible to comply with 603, altering existing toilet or bathing rooms shall not be required where a single unisex toilet room or bathing room complying with 213.2.1 is provided and located in the same area and on the same floor as existing inaccessible toilet or bathing rooms.

2. Where exceptions for alterations to qualified historic buildings or facilities are permitted by 202.5, no fewer than one toilet room for each sex complying with 603 or one unisex toilet room complying with 213.2.1 shall be provided.

Section 213.2.1 of the 2010 Standards identifies what should be included in a unisex toilet room to meet the federal guidelines.

**213.2.1 Unisex (Single-Use or Family) Toilet and Unisex Bathing Rooms.** Unisex toilet rooms shall contain not more than one lavatory, and two water closets without urinals or one water closet and one urinal. Unisex bathing rooms shall contain one shower or one shower and one bathtub, one lavatory,

and one water closet. Doors to unisex toilet rooms and unisex bathing rooms shall have privacy latches.

**Cost Impact:** Will not increase the cost of construction  
The revision is a clarification. It should not increase or decrease costs of construction. It may reduce administration costs because it clarifies something.

EB46-15 : 410.8.10-  
BOECKER5781

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** There was concern that the proposal adds back in the use of the term "unisex" when it has previously been removed. The list of sections listed seems to have omitted certain subsections from Section 1109.2.1 and should be further reviewed. Finally, there was concern with the requirement for 2 water closets where previously only 1 was required.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Gene Boecker, representing Code Consultants, Inc. (geneb@codeconsultants.com) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**1204.1.4 Toilet and bathing facilities.** Where toilet rooms are provided, either the men's and women's toilet rooms shall be accessible or at least one unisex toilet shall be provided. The unisex toilet room shall be constructed as an accessible family or assisted-use toilet room complying with Sections 1109.2.1.2, 1109.2.1.5, 1109.2.1.6 and 1109.2.1.7 of the *International Building Code*. A unisex toilet room shall be permitted to contain two water closets.

**Commenter's Reason:** This proposal uses the term unisex intentionally to differentiate it from the family assist toilet room. A family assist toilet room is intended to be provided to allow adults to assist a child of a different gender or for a person to assist a spouse. They are required only in specific conditions - assembly and mercantile occupancies. As proposed, a unisex toilet is a toilet in an existing building that can be used by a person because the main toilet rooms are not accessible. It can be used in any occupancy. It does not necessarily relate to the same function that a family assist toilet does. Therefore, the term is different as well. If the concern is about a definition that can be addressed later. There was also an expressed concern about a second water closet in the room. I believe this was misunderstood. A single water closet is "required" but a second one is "permitted." This is for two reasons. First, it harmonizes with the federal 2010 ADA Standards (Section 213.2.1) which allows two water closets. Second, it is often desirable in many places to include a children's water closet in addition to an

adult water closet. The added allowance to have the second water closet (not a requirement to add it) would accommodate that design option and match with the federal standard.

The modification to the historical building requirement in Section 1204.1.4 is to further clarify that in a historic building you can either fix existing bathrooms to be accessible or provide a unisex toilet room. This is consistent with providing allowances for historic significance in registered buildings.

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**EB46-15**



# EB50-15

## Chapters 5, 6, 7, 8, 9, 10, 11, 12, 13

### Proposed Change as Submitted

**Proponent :** Kathleen Petrie, representing Seattle Dept of Planning & Development (kathleen.petrie@seattle.gov)

## 2015 International Existing Building Code

Combine Chapters 5 through 12 and revise as follows:

### ~~CHAPTER 5 CLASSIFICATION OF WORK~~ WORK AREA METHOD

#### ~~SECTION 501 GENERAL CLASSIFICATION OF WORK~~

**501.1 Scope.** The provisions of this chapter shall be used in conjunction with Chapters 6 through 13 and shall apply to the *alteration, repair, addition* and *change of occupancy* of existing structures, including historic and moved structures, as referenced in Section 301.1.2. The work performed on an *existing building* shall be classified in accordance with this chapter.

**501.1.1 Compliance with other alternatives.** *Alterations, repairs, additions* and *changes of occupancy* to existing structures shall comply with the provisions of Chapters 6 through 13 this chapter or with one of the alternatives provided in Section 301.1.

~~501.2~~ **501.1.2 Work area.** The *work area*, as defined in Chapter 2, shall be identified on the construction documents.

#### ~~SECTION 502 REPAIRS~~

~~502.1~~ **501.2 Scope Repairs.** *Repairs*, as defined in Chapter 2, include the patching or restoration or replacement of damaged materials, elements, *equipment or fixtures* for the purpose of maintaining such components in good or sound condition with respect to existing loads or performance requirements.

~~502.2~~ **501.2.1 Application.** *Repairs* shall comply with the provisions of Chapter 6. Section 502.

~~502.3~~ **501.2.2 Related work.** Work on nondamaged components that is necessary for the required *repair* of damaged components shall be considered part of the *repair* and shall not be subject to the provisions of Chapter 7, 8, 9, 10 or 11 Sections 503, 504, 505, 506, or 507.

#### ~~SECTION 503 ALTERATIONS- LEVEL 1~~

~~503.1~~ **501.3 Scope Alteration - Level 1.** *No change to text.*

~~503.2~~ **501.3.1 Application.** Level 1 *alterations* shall comply with the provisions of Chapter 7. Section 503.

#### ~~SECTION 504 ALTERATIONS-LEVEL 2~~

~~504.1~~ **501.4 Scope Alteration - Level 2.** Level 2 *alterations* include the

reconfiguration of space, the addition or elimination of any door or window, the reconfiguration or extension of any system, or the installation of any additional equipment.

**~~504.2~~ 501.4.1 Application.** Level 2 *alterations* shall comply with the provisions of ~~Chapter 7~~ Section 503 for Level 1 *alterations* as well as the provisions of ~~Chapter 8~~ Section 504.

### **~~SECTION 505 ALTERATIONS-LEVEL 3~~**

**~~505.1~~ 501.5 Scope Alteration-Level 3.** Level 3 *alterations* apply where the work area exceeds 50 percent of the *building area*.

**~~505.2~~ 501.5.1 Application.** Level 3 *alterations* shall comply with the provisions of ~~Chapters 7~~ Sections 503 and ~~8~~ 504 for Level 1 and 2 *alterations*, respectively, as well as the provisions of ~~Chapter 9~~ Section 505.

### **~~SECTION 506 CHANGE OF OCCUPANCY~~**

**~~506.1~~ 501.6 Scope Change of occupancy.** *Change of occupancy* provisions apply where the activity is classified as a *change of occupancy* as defined in Chapter 2.

**~~506.2~~ 501.6.1 Application.** *Changes of occupancy* shall comply with the provisions of ~~Chapter 10~~ Section 506.

### **~~SECTION 507 ADDITIONS~~**

**~~507.1~~ 501.7 Scope Additions.** Provisions for *additions* shall apply where work is classified as an *addition* as defined in Chapter 2.

**~~507.2~~ 501.7.1 Application.** *Additions to existing buildings* shall comply with the provisions of ~~Chapter 11~~ Section 507.

### **~~SECTION 508 HISTORIC BUILDINGS~~**

**~~508.1~~ 501.8 Scope Historic Buildings.** *Historic building* provisions shall apply to buildings classified as historic as defined in Chapter 2.

**~~508.2~~ 501.8.1 Application.** Except as specifically provided for in ~~Chapter 12~~ Section 508, *historic buildings* shall comply with applicable provisions of this code for the type of work being performed.

### **~~SECTION 509 RELOCATED BUILDINGS~~**

**~~509.1~~ 501.9 Scope Relocated Buildings.** Relocated building provisions shall apply to relocated or moved buildings. Relocated buildings shall comply with the provisions of Section 509.

## **~~CHAPTER 6 REPAIRS~~**

### **~~SECTION 601~~502 GENERAL REPAIRS**

**~~601.1~~ 502.1 Scope.** Repairs as described in Section 502 shall comply with the requirements of this ~~chapter~~ section. Repairs to *historic buildings* need only comply with ~~Chapter 12~~ Section 508.

~~601.2~~ **502.2 Conformance.** The work shall not make the building less conforming than it was before the *repair* was undertaken.

~~[BS] 601.3~~ **502.3 Flood hazard areas.** In flood hazard areas, repairs that constitute *substantial improvement* shall require that the building comply with Section 1612 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable,

## ~~SECTION 602 BUILDING ELEMENTS AND MATERIALS~~

~~602.2~~ **502.5 New and replacement materials.** Except as otherwise required or permitted by this code, materials permitted by the applicable code for new construction shall be used. Like materials shall be permitted for *repairs* and *alterations*, provided no *dangerous* or *unsafe* condition, as defined in Chapter 2, is created. Hazardous materials, such as asbestos and lead-based paint, shall not be used where the code for new construction would not permit their use in buildings of similar occupancy, purpose and location.

~~602.3~~ **502.6 Glazing in hazardous locations.** Replacement glazing in hazardous locations shall comply with the safety glazing requirements of the *International Building Code* or *International Residential Code* as applicable.

**Exception:** Glass block walls, louvered windows, and jalousies repaired with like materials.

## ~~SECTION 603 FIRE PROTECTION~~

~~603.1~~ **502.7 General Fire protection.** *No change to text.*

## ~~SECTION 604 MEANS OF EGRESS~~

~~604.1~~ **502.8 General Means of egress.** *No change to text.*

## ~~SECTION 605 ACCESSIBILITY~~

~~605.1~~ **502.9 General Accessibility.** *No change to text.*

## ~~SECTION 606 STRUCTURAL~~

~~[BS] 606.1~~ **502.10 General Structural.** Structural repairs shall be in compliance with this section and Section ~~601.2~~502.10.1. Regardless of the extent of structural or nonstructural damage, *dangerous* conditions shall be eliminated. Regardless of the scope of *repair*, new structural members and connections used for *repair* or *rehabilitation* shall comply with the detailing provisions of the *International Building Code* for new buildings of similar structure, purpose and location.

## ~~SECTION 607 ELECTRICAL~~

~~607.1~~ **502.11 Material Electrical.** Existing electrical wiring and equipment undergoing *repair* shall be allowed to be repaired or replaced with like material.

## ~~SECTION 608 MECHANICAL~~

~~608.1~~ **502.12 General Mechanical.** Existing mechanical systems undergoing *repair* shall not make the building less conforming than it was before the *repair* was undertaken.

## **~~SECTION 609 PLUMBING~~**

**~~609.1 502.13~~ **Materials Plumbing.**** Plumbing materials and supplies shall not be used for repairs that are prohibited in the *International Plumbing Code*.

## **~~CHAPTER 7 ALTERATIONS—LEVEL 1~~**

### **~~SECTION 701 503 GENERAL ALTERATIONS—LEVEL 1~~**

**~~701.1 503.1~~ **Scope.**** Level 1 *alterations* as described in Section 503 ~~501.3~~ shall comply with the requirements of this ~~chapter~~ section. Level 1 *alterations to historic buildings* shall comply with this ~~chapter~~ section, except as modified in ~~Chapter 12~~. Section 508.

**~~701.2 503.2~~ **Conformance.**** An *existing building* or portion thereof shall not be altered such that the building becomes less safe than its existing condition.

**Exception:** Where the current level of safety or sanitation is proposed to be reduced, the portion altered shall conform to the requirements of the *International Building Code*.

**~~[BS] 701.3 503.3~~ **Flood hazard areas.**** In *flood hazard areas*, *alterations* that constitute *substantial improvement* shall require that the building comply with Section 1612 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable,

## **~~SECTION 702 BUILDING ELEMENTS AND MATERIALS~~**

**~~702.1 503.4~~ **Interior wall and ceiling finishes.**** All newly installed interior wall and ceiling finishes shall comply with Chapter 8 of the *International Building Code*.

**~~702.2 503.5~~ **Interior floor finish.**** New interior floor finish, including new carpeting used as an interior floor finish material, shall comply with Section 804 of the *International Building Code*.

**~~702.3 503.6~~ **Interior trim.**** All newly installed interior trim materials shall comply with Section 806 of the *International Building Code*.

**~~702.4 503.7~~ **Window opening control devices.**** In Group R-2 or R-3 buildings containing dwelling units and one- and two-family dwellings and townhouses regulated by the *International Residential Code*, window opening control devices complying with ASTM F 2090 shall be installed where an existing window is replaced and where all of the following apply to the replacement window:

1. The window is operable;
2. The window replacement includes replacement of the sash and the frame;
3. One of the following applies:
  - 3.1. In Group R-2 or R-3 buildings containing dwelling units, the top of the sill of the window opening is at a height less than 36 inches (915 mm) above the finished floor;or

- 3.2. In one- and two-family dwellings and town-houses regulated by the *International Residential Code*, the top sill of the window opening is at a height less than 24 inches (610 mm) above the finished floor;
4. The window will permit openings that will allow passage of a 4-inch-diameter (102 mm) sphere when the window is in its largest opened position; and
5. The vertical distance from the top of the sill of the window opening to the finished grade or other surface below, on the exterior of the building, is greater than 72 inches (1829 mm).

The window opening control device, after operation to release the control device allowing the window to fully open, shall not reduce the minimum net clear opening area of the window unit to less than the area required by the *International Building Code*.

**Exceptions:**

- 5.1. Operable windows where the top of the sill of the window opening is located more than 75 feet (22 860 mm) above the finished grade or other surface below, on the exterior of the room, space or building, and that are provided with window fall prevention devices that comply with ASTM F 2006.
- 5.2. Operable windows with openings that are provided with window fall prevention devices that comply with ASTM F 2090.

**~~702.5~~ 503.8 Emergency escape and rescue openings.** Where windows are required to provide emergency escape and rescue openings in Group R-2 and R-3 occupancies and one- and two-family dwellings and townhouses regulated by the *International Residential Code*, replacement windows shall be exempt from the requirements of Sections 1030.2, 1030.3 and 1030.5 of the *International Building Code* and Sections R310.21 and R310.2.3 of the *International Residential Code* accordingly, provided the replacement window is the manufacturer's largest standard size window that will fit within the existing frame or existing rough opening. The replacement window shall be permitted to be of the same operating style as the existing window or a style that provides for an equal or greater window opening area than the existing window.

Window opening control devices complying with ASTM F 2090 shall be permitted for use on windows required to provide *emergency escape and rescue openings*.

**~~702.6~~ 503.9 Materials and methods.** All new work shall comply with the materials and methods requirements in the *International Building Code*, *International Energy Conservation Code*, *International Mechanical Code*, and *International Plumbing Code*, as applicable, that specify material standards, detail of installation and connection, joints, penetrations, and continuity of any element, component, or system in the building.

**~~SECTION 703 FIRE PROTECTION~~**

**~~703.1~~ 503.10 General Fire protection.** *Alterations* shall be done in a manner that maintains the level of fire protection provided.

**~~SECTION 704 MEANS OF EGRESS~~**

~~704.1~~ **503.11 General Means of egress.** Alterations shall be done in a manner that maintains the level of protection provided for the means of egress.

## ~~SECTION 705 ACCESSIBILITY~~

~~705.1~~ **503.12 General Accessibility.** A facility that is altered shall comply with the applicable provisions in Sections ~~705.1.1~~ **503.12.1** through ~~705.1.14~~ **503.12.14**, and Chapter 11 of the *International Building Code* unless it is *technically infeasible*. Where compliance with this section is *technically infeasible*, the alteration shall provide access to the maximum extent that is technically feasible.

A facility that is constructed or altered to be accessible shall be maintained accessible during occupancy.

### **Exceptions:**

1. The altered element or space is not required to be on an accessible route unless required by Section 705.2.
2. Accessible means of egress required by Chapter 10 of the *International Building Code* are not required to be provided in existing facilities.
3. Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing facilities undergoing less than a Level 3 alteration.
4. The alteration to Type A individually owned dwelling units within a Group R-2 occupancy shall meet the provisions for Type B dwelling units.

## ~~SECTION 706 REROOFING~~

~~[BS] 706.1~~ **503.13 General Reroofing.** Materials and methods of application used for recovering or replacing an existing roof covering shall comply with the requirements of Chapter 15 of the *International Building Code*.

**Exception:** Reroofing shall not be required to meet the minimum design slope requirement of one-quarter unit vertical in 12 units horizontal (2-percent slope) in Section 1507 of the *International Building Code* for roofs that provide positive roof drainage.

## ~~SECTION 707 STRUCTURAL~~

~~[BS] 707.1~~ **503.14 General Structural.** Where alteration work includes replacement of equipment that is supported by the building or where a reroofing permit is required, the provisions of this section shall apply.

## ~~SECTION 708 ENERGY CONSERVATION~~

~~708.1~~ **503.15 Minimum requirements. Energy Conservation.** Level 1 alterations to existing buildings or structures are permitted without requiring the entire building or structure to comply with the energy requirements of the *International Energy Conservation Code* or *International Residential Code*. The alterations shall conform to the energy requirements of the *International Energy Conservation Code* or *International Residential Code* as they relate to new construction only.

## **~~CHAPTER 8 ALTERATIONS—LEVEL 2~~**

### **~~SECTION 801 504 GENERAL ALTERATIONS-LEVEL 2~~**

**~~801.1 504.1~~ Scope.** Level 2 *alterations* as described in Section ~~504~~ 501.4 shall comply with the requirements of this ~~chapter~~ section.

**Exception:** Buildings in which the reconfiguration is exclusively the result of compliance with the accessibility requirements of Section ~~705.2- 503.12.1~~ shall be permitted to comply with ~~Chapter 7~~ Section 503.

**~~801.2 504.1.1~~ Alteration Level 1 Additional compliance.** In addition to the requirements of this ~~chapter~~ section, all work shall comply with the requirements of ~~Chapter 7- Section 503~~.

**~~801.3 504.1.2~~ Compliance with International Building Code.** All new construction elements, components, systems, and spaces shall comply with the requirements of the *International Building Code*.

#### **Exceptions:**

1. Windows may be added without requiring compliance with the light and ventilation requirements of the *International Building Code*.
2. Newly installed electrical equipment shall comply with the requirements of Section 808.
3. The length of dead-end corridors in newly constructed spaces shall only be required to comply with the provisions of Section 805.6.
4. The minimum ceiling height of the newly created habitable and occupiable spaces and corridors shall be 7 feet (2134 mm).

### **~~SECTION 802 SPECIAL USE AND OCCUPANCY~~**

**~~802.1 504.2~~ General Special Use and Occupancy.** *Alteration* of buildings classified as special use and occupancy as described in the *International Building Code* shall comply with the requirements of Section 801.1 and the scoping provisions of Chapter 1 where applicable.

### **~~SECTION 803 BUILDING ELEMENTS AND MATERIALS~~**

**~~803.1 504.3~~ Scope Building Elements and materials.** *No change to text*.

### **~~SECTION 804 FIRE PROTECTION~~**

**~~804.1 504.4~~ Scope Fire protection.** The requirements of this section shall be limited to work areas in which Level 2 *alterations* are being performed, and where specified they shall apply throughout the floor on which the *work areas* are located or otherwise beyond the *work area*.

### **~~SECTION 805 MEANS OF EGRESS~~**

**~~805.1 504.5~~ Scope Means of egress.** The requirements of this section shall be limited to work areas that include exits or corridors shared by more

than one tenant within the *work area* in which Level 2 *alterations* are being performed, and where specified they shall apply throughout the floor on which the *work areas* are located or otherwise beyond the *work area*.

**805.2504.5.1 General.** The means of egress shall comply with the requirements of this section.

**Exceptions:**

1. Where the work area and the means of egress serving it complies with NFPA 101.
2. Means of egress conforming to the requirements of the building code under which the building was constructed shall be considered compliant means of egress if, in the opinion of the code official, they do not constitute a distinct hazard to life.

~~805.3 Number of exits.~~ The number of exits shall be in accordance with Sections ~~805.3.1 through 805.3.3.~~

~~805.3.1~~ **504.5.2 Minimum number of exits.** Every story utilized for human occupancy on which there is a *work area* that includes exits or corridors shared by more than one tenant within the *work area* shall be provided with the minimum number of exits based on the occupancy and the occupant load in accordance with the *International Building Code*. In addition, the exits shall comply with Sections 805.3.1.1 and 805.3.1.2.

~~805.4.1 Two egress doorways required.~~ Work areas shall be provided with two egress doorways in accordance with the requirements of Sections 805.4.1.1 and 805.4.1.2.

~~805.8~~ **504.5.10 Exit signs.** Exit signs Means of egress in all work areas shall be provided with exit signs in accordance with this section, as applicable. the requirements of the *International Building Code*.

~~805.8.1 Work areas.~~ Means of egress in all work areas shall be provided with exit signs in accordance with the requirements of the *International Building Code*.

~~805.10.1 Capacity.~~ The required capacity of refuge areas shall be in accordance with Sections ~~805.10.1.1 through 805.10.1.3.~~

~~SECTION 806 ACCESSIBILITY~~

~~806.1~~ **504.6 General Accessibility.** A building, *facility*, or element that is altered shall comply with this section and Section 705.~~SECTION 807 STRUCTURAL~~

~~[BS] 807.1~~ **504.7 General Structural.** Structural elements and systems within buildings undergoing Level 2 *alterations* shall comply with this section.

~~SECTION 808 ELECTRICAL~~

**504.8 Electrical.** Electrical equipment and wiring shall comply with section 504.8.1 through 504.8.3.7.

~~808.1~~ **504.8.1 New installations.** All newly installed electrical equipment and wiring relating to work done in any work area shall comply with all



applicable requirements of NFPA 70 except as provided for in Section ~~808.3~~504.8.3.

~~808.2~~ **504.8.2 Existing installations.** Existing wiring in all work areas in Group A-1, A-2, A-5, H and I occupancies shall be upgraded to meet the materials and methods requirements of ~~Chapter 7~~. Section 503.

### ~~SECTION 809 MECHANICAL~~

**504.9 Mechanical.** Mechanical equipment shall comply with sections 504.9 through 504.9.3.

### ~~SECTION 810 PLUMBING~~

~~810.1~~ **504.10 Minimum plumbing fixtures.** Where the occupant load of the story is increased by more than 20 percent, plumbing fixtures for the story shall be provided in quantities specified in the *International Plumbing Code* based on the increased occupant load.

### ~~SECTION 811 ENERGY CONSERVATION~~

~~811.1~~ **504.11 Minimum energy conservation requirements.** Level 2 *alterations to existing buildings* or structures are permitted without requiring the entire building or structure to comply with the energy requirements of the *International Energy Conservation Code* or *International Residential Code*. The *alterations* shall conform to the energy requirements of the *International Energy Conservation Code* or *International Residential Code* as they relate to new construction only.

## ~~CHAPTER 9 ALTERATIONS—LEVEL 3~~

### ~~SECTION 901- 505 GENERAL ALTERATIONS-LEVEL 3~~

~~901.1~~ **505.1 Scope.** Level 3 *alterations* as described in Section ~~505~~ 501.5 shall comply with the requirements of this ~~chapter~~ section.

~~901.2~~ **505.2 Compliance.** In addition to the provisions of this ~~chapter~~ section, work shall comply with all of the requirements of ~~Chapters 7~~ Sections 503 and 504. The requirements of Sections 803, 804 and 805 shall apply within all *work areas* whether or not they include exits and corridors shared by more than one tenant and regardless of the occupant load.

**Exception:** Buildings in which the reconfiguration of space affecting exits or shared egress access is exclusively the result of compliance with the accessibility requirements of Section 705.2 shall not be required to comply with this ~~chapter~~ section.

### ~~SECTION 902 SPECIAL USE AND OCCUPANCY~~

~~902.1~~ **505.3 High-rise buildings.** *No change to text.*

~~902.2~~ **505.4 Boiler and furnace equipment rooms.** Boiler and furnace equipment rooms adjacent to or within Groups I-1, I-2, I-4, R-1, R-2 and R-4 occupancies shall be enclosed by 1-hour fire-resistance-rated

construction.

**Exceptions:**

1. Steam boiler equipment operating at pressures of 15 pounds per square inch gauge (psig) (103.4 KPa) or less is not required to be enclosed.
2. Hot water boilers operating at pressures of 170 psig (1171 KPa) or less are not required to be enclosed.
3. Furnace and boiler equipment with 400,000 British thermal units (Btu) ( $4.22 \times 10^8$  J) per hour input rating or less is not required to be enclosed.
4. Furnace rooms protected with an automatic sprinkler system are not required to be enclosed.

**~~SECTION 903 BUILDING ELEMENTS AND MATERIALS~~**

**~~903.1 505.5 Existing shafts and vertical openings.~~** Existing stairways that are part of the means of egress shall be enclosed in accordance with Section 803.2.1 from the highest *work area* floor to, and including, the level of exit discharge and all floors below.

**~~903.2 505.6 Fire partitions in Group R-3.~~** *No change to text.*

**~~903.3 505.7 Interior finish.~~** Interior finish in exits serving the *work area* shall comply with Section 803.4 between the highest floor on which there is a *work area* to the floor of exit discharge.

**~~SECTION 904 FIRE PROTECTION~~**

**~~904.1 505.8 Automatic sprinkler systems.~~** *No change to text.*

**~~904.2 505.9 Fire alarm and detection systems.~~** Fire alarm and detection shall be provided in accordance with Section 907 of the *International Building Code* as required for new construction.

**~~SECTION 905 MEANS OF EGRESS~~**

**~~905.1 505.10 General Means of egress.~~** *No change to text.*

**~~SECTION 906 ACCESSIBILITY~~**

**~~906.1 505.11 General Accessibility.~~** A building, *facility* or element that is altered shall comply with this section and Sections 705 and 806.

**~~SECTION 907 STRUCTURAL~~**

**~~[BS] 907.1 505.12 General Structural.~~** Where buildings are undergoing Level 3 *alterations* including structural *alterations*, the provisions of this section shall apply.

**~~[BS] 907.4 505.12.3 Existing structural elements resisting lateral loads.~~** All existing elements of the lateral force-resisting system shall comply with this section.

**Exceptions:**

1. Buildings of Group R occupancy with no more than five dwelling or sleeping units used solely for residential purposes that are altered based on the conventional light-

frame construction methods of the *International Building Code* or in compliance with the provisions of the *International Residential Code*.

2. Where such *alterations* involve only the lowest story of a building and the *change of occupancy* provisions of ~~Chapter 10~~ Section 506 do not apply, only the lateral force-resisting components in and below that story need comply with this section.

### ~~SECTION 908 ENERGY CONSERVATION~~

~~908.1~~ 505.13 **Minimum requirements. Energy conservation.** Level 3 *alterations to existing buildings* or structures are permitted without requiring the entire building or structure to comply with the energy requirements of the *International Energy Conservation Code* or *International Residential Code*. The *alterations* shall conform to the energy requirements of the *International Energy Conservation Code* or *International Residential Code* as they relate to new construction only.

## ~~CHAPTER 10 CHANGE OF OCCUPANCY~~

### ~~SECTION 1001 506 GENERAL CHANGE OF OCCUPANCY~~

~~1001.1~~ 506.1 **Scope.** The provisions of this ~~chapter~~ section shall apply where a *change of occupancy* occurs, as defined in Section 202.

~~1001.2~~ 506.2 **Certificate of occupancy.** A change of occupancy or a change of occupancy within a space where there is a different fire protection system threshold requirement in Chapter 9 of the *International Building Code* shall not be made to any structure without the approval of the *code official*. A certificate of occupancy shall be issued where it has been determined that the requirements for the change of occupancy have been met.

~~1001.3~~ 506.3 **Certificate of occupancy required.** A certificate of occupancy shall be issued where a *change of occupancy* occurs that results in a different occupancy classification as determined by the *International Building Code*.

### ~~SECTION 1002 SPECIAL USE AND OCCUPANCY~~

~~1002.1~~ 506.4 **Compliance with the building code. Special use and occupancy.** Where the character or use of an *existing building* or part of an *existing building* is changed to one of the following special use or occupancy categories as defined in the *International Building Code*, the building shall comply with all of the applicable requirements of the *International Building Code*:

1. Covered and open mall buildings.
2. Atriums.
3. Motor vehicle-related occupancies.
4. Aircraft-related occupancies.
5. Motion picture projection rooms.
6. Stages and platforms.
7. Special amusement buildings.

8. Incidental use areas.
9. Hazardous materials.
10. Ambulatory care facilities.
11. Group I-2 occupancies.

## ~~SECTION 1003 BUILDING ELEMENTS AND MATERIALS~~

~~1003.1~~ **506.5 General Building elements and materials.** Building elements and materials in portions of buildings undergoing a *change of occupancy* classification shall comply with Section 1012.

## ~~SECTION 1004 FIRE PROTECTION~~

~~1004.1~~ **506.6 General Fire protection.** Fire protection requirements of Section 1012 shall apply where a building or portions thereof undergo a *change of occupancy* classification or where there is a change of occupancy within a space where there is a different fire protection system threshold requirement in Chapter 9 of the *International Building Code*.

## ~~SECTION 1005 MEANS OF EGRESS~~

~~1005.1~~ **506.7 General Means of egress.** Means of egress in portions of buildings undergoing a *change of occupancy* classification shall comply with Section 1012.

## ~~SECTION 1006 ACCESSIBILITY~~

~~1006.1~~ **506.8 General Accessibility.** Accessibility in portions of buildings undergoing a *change of occupancy* classification shall comply with Section 1012.8.

## ~~SECTION 1007 STRUCTURAL~~

**506.9 Structural.** Buildings undergoing *change of occupancy* are subject to Section 506.9.

## ~~SECTION 1008 ELECTRICAL~~

**506.10 Electrical.** Electrical equipment and wiring shall comply with Sections 506.10.1 through 506.10.4

## ~~SECTION 1009 MECHANICAL~~

~~1009.1~~ **506.11 Mechanical requirements.** Where the occupancy of an *existing building* or part of an *existing building* is changed such that the new occupancy is subject to different kitchen exhaust requirements or to increased mechanical ventilation requirements in accordance with the *International Mechanical Code*, the new occupancy shall comply with the respective *International Mechanical Code* provisions.

## ~~SECTION 1010 PLUMBING~~

**506.12 Plumbing.** Plumbing equipment and systems shall comply with Section 506.12.

## ~~SECTION 1011 OTHER REQUIREMENTS~~

~~1011.1~~ **506.13 Light and ventilation.** Light and ventilation shall comply with the requirements of the *International Building Code* for the new occupancy.

## **~~SECTION 1012 CHANGE OF OCCUPANCY CLASSIFICATION~~**

**~~1012.1~~ 506.14 **General Change of occupancy classification.** The provisions of this section shall apply to buildings or portions thereof undergoing a change of occupancy classification. This includes a change of occupancy classification within a group as well as a change of occupancy classification from one group to a different group or where there is a change of occupancy within a space where there is a different fire protection system threshold requirement in Chapter 9 of the *International Building Code*. Such buildings shall also comply with Sections 1002 through 1011. The application of requirements for the change of occupancy shall be as set forth in Sections 1012.1.1 through 1012.1.4. A *change of occupancy*, as defined in Section 202, without a corresponding change of occupancy classification shall comply with Section 1001.2.**

**~~1012.1.1~~ 506.14.1 **Compliance with Chapter 9, Section 505.** The requirements of ~~Chapter 9, Section 505~~ shall be applicable throughout the building for the new occupancy classification based on the separation conditions set forth in Sections 1012.1.1.1 and 1012.1.1.2.**

**~~1012.2~~ **Fire protection systems.** Fire protection systems shall be provided in accordance with ~~Sections 1012.2.1 and 1012.2.2.~~**

**~~1012.2.1~~ 506.14.5 **Fire sprinkler system.** Where a change in occupancy classification occurs or where there is a change of occupancy within a space where there is a different fire protection system threshold requirement in Chapter 9 of the *International Building Code* that requires an automatic fire sprinkler system to be provided based on the new occupancy in accordance with Chapter 9 of the *International Building Code*, such system shall be provided throughout the area where the *change of occupancy* occurs.**

**~~1012.2.2~~ 506.14.6 **Fire alarm and detection system.** Where a change in occupancy classification occurs or where there is a change of occupancy within a space where there is a different fire protection system threshold requirement in Chapter 9 of the *International Building Code* that requires a fire alarm and detection system to be provided based on the new occupancy in accordance with Chapter 9 of the *International Building Code*, such system shall be provided throughout the area where the *change of occupancy* occurs. Existing alarm notification appliances shall be automatically activated throughout the building. Where the building is not equipped with a fire alarm system, alarm notification appliances shall be provided throughout the area where the *change of occupancy* occurs in accordance with Section 907 of the *International Building Code* as required for new construction.**

**~~1012.3~~ 506.14.7 **Interior finish.** In areas of the building undergoing the change of occupancy classification, the interior finish of walls and ceilings shall comply with the requirements of the *International Building Code* for the new occupancy classification.**

**~~1012.4~~ 506.14.8 **Means of egress, general.** Hazard categories in regard to life safety and means of egress shall be in accordance with Table ~~1012.4~~ 506.14.8.**

~~1012.5~~ **506.14.9 Heights and areas.** Hazard categories in regard to height and area shall be in accordance with Table ~~1012.5~~ 506.14.9.

~~1012.6~~ **506.14.10 Exterior wall fire-resistance ratings.** Hazard categories in regard to fire-resistance ratings of exterior walls shall be in accordance with Table ~~1012.6~~ 506.14.10.

~~1012.7~~ **506.14.11 Enclosure of vertical shafts.** Enclosure of vertical shafts shall be in accordance with Sections ~~1012.7.1~~ 506.14.11.1 through ~~1012.7.4~~ 506.14.11.4.

~~1012.8~~ **506.14.12 Accessibility.** *Existing buildings* that undergo a change of group or occupancy classification shall comply with this section.

**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in existing buildings and facilities undergoing a *change of occupancy* in conjunction with less than a Level 3 *alteration*.

## ~~CHAPTER 11~~ ADDITIONS

### ~~SECTION 1101~~ 507 GENERAL ADDITIONS

~~1101.1~~ **507.1 Scope.** An *addition* to a building or structure shall comply with the *International Codes* as adopted for new construction without requiring the *existing building* or structure to comply with any requirements of those codes or of these provisions, except as required by this ~~chapter~~ section. Where an *addition* impacts the *existing building* or structure, that portion shall comply with this code.

~~1101.2~~ **507.2 Creation or extension of nonconformity.** An *addition* shall not create or extend any nonconformity in the *existing building* to which the *addition* is being made with regard to accessibility, structural strength, fire safety, means of egress, or the capacity of mechanical, plumbing, or electrical systems.

~~1101.3~~ **507.3 Other work.** Any *repair* or *alteration* work within an *existing building* to which an *addition* is being made shall comply with the applicable requirements for the work as classified in ~~Chapter 5~~. Section 501.

### ~~SECTION 1102~~ HEIGHTS AND AREAS

~~1102.1~~ **507.4 Height limitations.** No *addition* shall increase the height of an *existing building* beyond that permitted under the applicable provisions of Chapter 5 of the *International Building Code* for new buildings.

~~1102.2~~ **507.5 Area limitations.** No *addition* shall increase the area of an *existing building* beyond that permitted under the applicable provisions of Chapter 5 of the *International Building Code* for new buildings unless fire separation as required by the *International Building Code* is provided.

**Exception:** In-filling of floor openings and nonoccupiable appendages such as elevator and exit stairway shafts shall be permitted beyond that permitted by the *International Building Code*.

~~1102.3~~ **507.6 Fire protection systems.** Existing fire areas increased by the *addition* shall comply with Chapter 9 of the *International Building Code*.

## ~~SECTION 1103 STRUCTURAL~~

~~[BS] 1103.1 507.7 Compliance with the International Building Code Structural.~~ Additions to existing buildings or structures are new construction and shall comply with the *International Building Code*.

~~[BS] 1103.2 507.7.1 Additional gravity loads.~~ Existing structural elements supporting any additional gravity loads as a result of additions shall comply with the *International Building Code*.

### **Exceptions:**

1. Structural elements whose stress is not increased by more than 5 percent.
2. Buildings of Group R occupancy with no more than five dwelling units or sleeping units used solely for residential purposes where the *existing building* and the *addition* comply with the conventional lightframe construction methods of the *International Building Code* or the provisions of the *International Residential Code*.

## ~~SECTION 1104 SMOKE ALARMS IN OCCUPANCY GROUPS R AND I-1~~

~~1104.1 507.8 Smoke alarms in existing portions of a building.~~ Where an *addition* is made to a building or structure of a Group R or I-1 occupancy, the *existing building* shall be provided with smoke alarms as required by Section 1103.8 of the *International Fire Code* or Section R314 of the *International Residential Code* as applicable.

## ~~SECTION 1105 ACCESSIBILITY~~

~~1105.1 507.9 Minimum requirements Accessibility.~~ Accessibility provisions for new construction shall apply to additions. An addition that affects the accessibility to, or contains an area of, *primary function* shall comply with the requirements of Sections 705, 806 and 906, as applicable.

~~1105.2 507.9.1 Accessible dwelling units and sleeping units.~~ Where Group I-1, I-2, I-3, R-1, R-2 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the *International Building Code* for accessible units apply only to the quantity of spaces being added.

## ~~SECTION 1106 ENERGY CONSERVATION~~

~~1106.1 507.10 Minimum requirements. Energy Conservation.~~ Additions to existing buildings shall conform to the energy requirements of the *International Energy Conservation Code* or *International Residential Code* as they relate to new construction.

## ~~CHAPTER 12 HISTORIC BUILDINGS~~

### ~~SECTION 1201 508 GENERAL HISTORIC BUILDINGS~~

~~1201.1 508.1 Scope.~~ It is the intent of this ~~chapter section~~ to provide means for the preservation of *historic buildings*. Historical buildings shall comply with the provisions of this ~~chapter section~~ relating to their *repair, alteration, relocation and change of occupancy*.

~~[BS] 1201.2 508.2 Report.~~ A *historic building* undergoing *repair*,

*alteration, or change of occupancy* shall be investigated and evaluated. If it is intended that the building meet the requirements of this ~~chapter~~ section, a written report shall be prepared and filed with the *code official* by a registered design professional when such a report is necessary in the opinion of the *code official*. Such report shall be in accordance with Chapter 1 and shall identify each required safety feature that is in compliance with this ~~chapter~~ section and where compliance with other chapters of these provisions would be damaging to the contributing historic features. For buildings assigned to Seismic Design Category D, E or F, a structural evaluation describing, at a minimum, the vertical and horizontal elements of the lateral force-resisting system and any strengths or weaknesses therein shall be prepared. Additionally, the report shall describe each feature that is not in compliance with these provisions and shall demonstrate how the intent of these provisions is complied with in providing an equivalent level of safety.

**~~1201.3~~ 508.3 Special occupancy exceptions—museums.** When a building in Group R-3 is also used for Group A, B, or M purposes such as museum tours, exhibits, and other public assembly activities, or for museums less than 3,000 square feet (279 m<sup>2</sup>), the *code official* may determine that the occupancy is Group B when life-safety conditions can be demonstrated in accordance with Section 1201.2. Adequate means of egress in such buildings, which may include a means of maintaining doors in an open position to permit egress, a limit on building occupancy to an occupant load permitted by the means of egress capacity, a limit on occupancy of certain areas or floors, or supervision by a person knowledgeable in the emergency exiting procedures, shall be provided.

**~~[BS] 1201.4~~ 508.4 Flood hazard areas.** In *flood hazard areas*, if all proposed work, including repairs, work required because of a *change of occupancy*, and *alterations*, constitutes *substantial improvement*, then the *existing building* shall comply with Section 1612 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable.

**Exception:** If an *historic building* will continue to be an *historic building* after the proposed work is completed, then the proposed work is not considered a *substantial improvement*. For the purposes of this exception, an *historic building* is:

1. Listed or preliminarily determined to be eligible for listing in the National Register of Historic Places;
2. Determined by the Secretary of the U.S. Department of Interior to contribute to the historical significance of a registered historic district or a district preliminarily determined to qualify as a historic district; or
3. Designated as historic under a state or local historic preservation program that is approved by the Department of Interior.

## **~~SECTION 1202~~ REPAIRS**

**~~1202.1~~ 508.5 General Repairs.** Repairs to any portion of an *historic building* or structure shall be permitted with original or like materials and original methods of construction, subject to the provisions of this ~~chapter~~ section. Hazardous materials, such as asbestos and lead-based paint, shall not be used where the code for new construction would not permit their use



in buildings of similar occupancy, purpose and location.

**~~1202.2~~ 508.5.1 Unsafe conditions.** Conditions determined by the *code official* to be *unsafe* shall be remedied. No work shall be required beyond what is required to remedy the *unsafe* conditions.

### **~~SECTION 1203 FIRE SAFETY~~**

**~~1203.1~~ 508.6 Scope Fire safety.** *Historic buildings* undergoing *alterations, changes of occupancy,* or that are moved shall comply with Section 1203.

**~~1203.2~~ 508.6.1 General.** Every *historic building* that does not conform to the construction requirements specified in this code for the occupancy or use and that constitutes a distinct fire hazard as defined herein shall be provided with an approved automatic fire-extinguishing system as determined appropriate by the *code official*. However, an automatic fire-extinguishing system shall not be used to substitute for, or act as an alternative to, the required number of exits from any *facility*.

### **~~SECTION 1204 ALTERATIONS~~**

**~~1204.1~~ 508.7 Accessibility requirements.** The provisions of Sections 705, 806 and 906, as applicable, shall apply to facilities designated as historic structures that undergo *alterations*, unless *technically infeasible*. Where compliance with the requirements for accessible routes, entrances or toilet rooms would threaten or destroy the historic significance of the building or *facility*, as determined by the *code official*, the alternative requirements of Sections 1204.1.1 through 1204.1.4 for that element shall be permitted.

**Exception:** Type B dwelling or sleeping units required by Section 1107 of the *International Building Code* are not required to be provided in historical buildings.

### **~~SECTION 1205 CHANGE OF OCCUPANCY~~**

**~~1205.1~~ 508.8 General Change of occupancy.** *Historic buildings* undergoing a *change of occupancy* shall comply with the applicable provisions of ~~Chapter 10 Section 506~~, except as specifically permitted in this ~~chapter section~~. When ~~Chapter 10 Section 506~~ requires compliance with specific requirements of ~~Chapter 7 Section 503~~, ~~Chapter 8 Section 504~~, or ~~Chapter 9 Section 505~~ and when those requirements are subject to the exceptions in Section 1202, the same exceptions shall apply to this section.

### **~~SECTION 1206 STRUCTURAL~~**

**~~[BS] 1206.1~~ 508.9 General Structural.** *Historic buildings* shall comply with the applicable structural provisions for the work as classified in ~~Chapter 5 Section 501~~.

**Exception:** The *code official* shall be authorized to accept existing floors and approve operational controls that limit the live load on any such floor.

## **~~CHAPTER 13 RELOCATED OR MOVED BUILDINGS~~**

### **~~SECTION 1301 509 GENERAL RELOCATED OR MOVED BUILDINGS~~**

~~1301.1~~ **509.1 Scope.** This chapter section provides requirements for relocated or moved structures, including relocatable buildings as defined in Chapter 2.

~~509.2 Application.~~ Relocated buildings shall comply with the provisions of Chapter 13.

~~1301.2~~ **509.2 Conformance.** The building shall be safe for human occupancy as determined by the *International Fire Code* and the *International Property Maintenance Code*. Any repair, alteration, or change of occupancy undertaken within the moved structure shall comply with the requirements of this code applicable to the work being performed. Any field-fabricated elements shall comply with the requirements of the *International Building Code* or the *International Residential Code* as applicable.

## ~~SECTION 1302~~ REQUIREMENTS

~~1302.1~~ **509.3 Location on the lot.** The building shall be located on the lot in accordance with the requirements of the *International Building Code* or the *International Residential Code* as applicable.

~~[BS] 1302.2~~ **509.4 Foundation.** The foundation system of relocated buildings shall comply with the *International Building Code* or the *International Residential Code* as applicable.

~~[BS] 1302.3~~ **509.5 Wind loads.** Buildings shall comply with *International Building Code* or *International Residential Code* wind provisions as applicable.

### Exceptions:

1. Detached one- and two-family dwellings and Group U occupancies where wind loads at the new location are not higher than those at the previous location.
2. Structural elements whose stress is not increased by more than 10 percent.

~~[BS] 1302.4~~ **509.6 Seismic loads.** Buildings shall comply with *International Building Code* or *International Residential Code* seismic provisions at the new location as applicable.

### Exceptions:

1. Structures in Seismic Design Categories A and B and detached one- and two-family dwellings in Seismic Design Categories A, B and C where the seismic loads at the new location are not higher than those at the previous location.
2. Structural elements whose stress is not increased by more than 10 percent.

~~[BS] 1302.5~~ **509.7 Snow loads.** Structures shall comply with *International Building Code* or *International Residential Code* snow loads as applicable where snow loads at the new location are higher than those at the previous location.

**Exception:** Structural elements whose stress is not increased by more than 5 percent.

~~[BS] 1302.6~~ **509.8 Flood hazard areas.** If relocated or moved into a

flood hazard area, structures shall comply with Section 1612 of the *International Building Code*, or Section R322 of the *International Residential Code*, as applicable.

**[BS] 1302.7 509.9 Required inspection and repairs.** *No change to text.*

**Reason:** This proposal reorganizes the IEBC work area method into a single chapter without making any technical changes. For a complete version of this proposal we ask that you go to: [Work Area Chapter](#). This other document shows the intent of the proposal more clearly and accurately.

The IEBC includes 3 compliance methods--prescriptive (chapter 4), work area method (chapters 5-13), and the performance method (chapter 14). The basic premise of the IEBC is that the 3 methods are equivalent. A remodel project that uses the prescriptive method is equally as compliant as one that uses the work area method.

The format of the code doesn't reflect this equivalence. Two compliance methods are contained within a single chapter each. The work area method, however, is spread out over 9 chapters. This formatting can be misleading. It gives the appearance, for instance, that Chapter 11 applies to all additions and that Chapter 12 applies to all historic buildings, regardless of compliance method chosen for a particular project. It's misleading and confusing to designers who are trying to apply the IEBC to a building project. It's also misleading for code development. As an example, EB52-2012 was a very good code change proposal from the last code cycle that straightened out how changes of occupancy are treated in the IEBC. However, it only addressed Chapter 10 in the work area method, omitting the other 2 methods.

Each chapter of the work area method is assigned to a single section, all the sections in chapters 5-13 are renumbered, some are given different titles, and some redundant language is deleted. A few charging sections are added where the current code relies on a section title for charging. The order of the sections is not changed. The code change proposal does not show every section that would be renumbered. Sections that are not shown would be renumbered sequentially. The proposal also shows a small number of sections where we're proposing to change some language. Our intention with this proposal is that a comprehensive renumbering and correction of cross references would be done by staff and ICC's editors. An attachment to this proposal shows the details of how the renumbering could be done.

We'd like to point out that the maximum number of decimal points in section numbers is not increased in this proposal. The IEBC currently has some sections with 4 decimal points, and that is also the maximum number of decimal points in this proposal.

**Cost Impact:** Will not increase the cost of construction  
This proposal renumbers code sections without making any technical changes.

**Analysis:** As stated, this proposal reorganizes several chapters of the code into a single chapter. For clarity, the code change as depicted here shows only the major sections that are moved, renumbered, or both. To view the location and renumbering of all of the sections involved, the document entitled "Work Area Chapter" can be found by clicking the link at the beginning of the proponent's reason statement.

**Committee Action:****Disapproved**

**Committee Reason:** This proposal was disapproved as it would make the IEBC more difficult to use even though the intent was to simplify. The IEBC is already written differently than the IBC and this will cause further confusion with such a drastic change in format.

**Assembly Action :****None**

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**Individual Consideration Agenda*****Public Comment 1:***

**Proponent : Kathleen Petrie, representing City of Seattle, Department of Planning and Development (kathleen.petrie@seattle.gov) requests Approve as Submitted.**

**Commenter's Reason:** Per Section 301.1, one of the three methods of compliance (Prescriptive, Work Area, and Performance) must be chosen to apply toward a project in order to comply with the IEBC. The Prescriptive and Performance methods are each compiled entirely within their individual chapter; however the Work Area method is spread across 9 chapters. This format makes the code organization inconsistent and confusing for the user.

If all components of the Work Area method are moved into one chapter, the user only has to go to one location. The IEBC will then be comprised of 3 chapters which address the 3 methods, and all remaining chapters have information and requirements which apply to all methods. It may appear odd to slightly modify the format of a code, but this change makes the IEBC much more intuitive for the user.

This proposal does not make technical changes. In order to clarify for the monograph, the code change as depicted here shows only the major sections that are moved, renumbered, or both. To view the location and renumbering of all of the sections involved, please see the complete Work Area Chapter document attached.

<http://media.iccsafe.org/cdpACCESS/docs/EB50.pdf>

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**EB50-15**

# EB56-15

## 705.1.13

### **Proposed Change as Submitted**

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## **2015 International Existing Building Code**

### **Revise as follows:**

~~705.1.13~~ **705.1.1** **Extent of application.** An *alteration* of an existing element, space, or area of a *facility* shall not impose a requirement for greater accessibility than that which would be required for new construction. *Alterations* shall not reduce or have the effect of reducing accessibility of a *facility* or portion of a *facility*.

**Reason:** The intent of the verbiage change is coordination between Section 410.3 and 705.1.13. The struck words are covered in the definition of facility. The relocation to first in the list is to place this allowance in a more prominent position, similar to Chapter 4. If accessibility is not required in new construction, you would not need to go through any of the list following.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

The proposal is a clarification of current requirements; therefore, there is no impact on the cost.

EB56-15 : 705.1.13-  
KULIK3405

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### **Public Hearing Results**

#### **Committee Action:**

**Disapproved**

**Committee Reason:** This proposal was disapproved with concern with actions taken on the accessibility provisions in other code change proposals. More specifically, code change proposal EB33-15 moved all the accessibility provisions into Chapter 3 and the provisions of Section 705 were essentially deleted.

**Individual Consideration Agenda*****Public Comment 1:***

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Submitted.**

**Commenter's Reason:** The ICC Building Code Action Committee requests approval of this proposal as submitted. This change got confused by the committee with the reorganization of accessibility provisions made by EB 33-15. If this relocation is approved, it will facilitate the merging of the accessibility provision in EB 33. This proposal could also stand on it's own.

The intent of the verbiage change is coordination between Section 410.3 and 705.1.13. The struck words are covered in the definition of facility. The relocation to first in the list is to place this allowance in a more prominent position, similar to Chapter 4. If accessibility is not required in new construction, you would not need to go through any of the list following.

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**EB56-15**

# EB58-15

## 804.2.2

### **Proposed Change as Submitted**

**Proponent :** Carl Baldassarra, P.E., FSFPA, P.E., FSFPE, Chair, Code Technology Committee, representing Code Technology Committee (CTC@iccsafe.org)

## **2015 International Existing Building Code**

### **Revise as follows:**

**804.2.2 Groups A, B, E, F-1, H, I, M, R-1, R-2, ~~R-4~~, S-1 and S-2.** In buildings with occupancies in Groups A, B, E, F-1, H, I, M, R-1, R-2, ~~R-4~~, S-1 and S-2, work areas that have exits or corridors shared by more than one tenant or that have exits or corridors serving an occupant load greater than 30 shall be provided with automatic sprinkler protection where all of the following conditions occur:

1. The *work area* is required to be provided with automatic sprinkler protection in accordance with the *International Building Code* as applicable to new construction; and
2. The *work area* exceeds 50 percent of the floor area.  
**Exception:** If the building does not have sufficient municipal water supply for design of a fire sprinkler system available to the floor without installation of a new fire pump, work areas shall be protected by an automatic smoke detection system throughout all occupiable spaces other than sleeping units or individual dwelling units that activates the occupant notification system in accordance with Sections 907.4, 907.5 and 907.6 of the *International Building Code*.

**Reason:** This is a single exit building, and given the limit on the number of residents in Group R-4, will not ever have more than 30, therefore, Group R-4 should not be included since the requirement would never be applicable.

The ICC Code Technology Committee (CTC) has just completed its 10th year. The ICC Board has decided to sunset the CTC. The sunset plan includes re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). The two remaining CTC Areas of Study are Care Facilities and Elevator Lobbies/WTC Elevator issues. This proposal falls under the Care Facilities Area of Study. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website at:

<http://www.iccsafe.org/cs/CTC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction  
This eliminates a requirement that is never applicable.

EB58-15 : 804.2.2-  
BALDASSARRA4284

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## **Public Hearing Results**

**Committee Action:****Disapproved**

**Committee Reason:** There were two main concerns with this proposal. First, mixed use buildings may contain Group R-4 occupancies and the total occupant load can easily surpass 30. Secondly, the reason statement refers to residents but the requirements refer to occupants. Though the residents may never exceed 30 the number of occupants may.

**Assembly Action :****None**

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**Individual Consideration Agenda*****Public Comment 1:***

**Proponent : Carl Baldassarra, P.E., FSFPA, representing Code Technologies Committee (CTC@iccsafe.org) requests Approve as Submitted.**

**Commenter's Reason:** The CTC did a review of the codes regarding where there were differences between Group R-3 and R-4 requirements. Where there was a difference, there was a review of the requirement to see if there was technical justification for the requirement. If there is no technical justification, this could be considered a violation of the Fair Housing Act since the code is asking for something more than asked for in a single family home.

Group R-4 is determined by the number of residents (not counting staff), not the occupant load, so this requirement could result in a requirement that was more restrictive in the IEBC than for new construction.

The IEBC development committee disapproved this proposal based on the possibility that a Group R-4 could have 30 occupants. Based on the occupant load table, that would be a group home with an area of large than 6,000 sq.ft. or larger all discharging through the same corridor or exit (per the base requirement in this section). In addition, the reference for occupant notification systems in the exception to Item 2 are to sections not applicable for Group R-4 facilities.

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**EB58-15**



# EB59-15

## 804.2.2

### **Proposed Change as Submitted**

**Proponent :** Adolf Zubia, IAFC Fire & Life Safety Section, representing IAFC Fire & Life Safety Section

## **2015 International Existing Building Code**

**Revise as follows:**

**804.2.2 Groups A, B, E, F-1, H, I, M, R-1, R-2, R-4, S-1 and S-2.** In buildings with occupancies in Groups A, B, E, F-1, H, I, M, R-1, R-2, R-4, S-1 and S-2, work areas that have exits or corridors shared by more than one tenant or that have exits or corridors serving an occupant load greater than 30 shall be provided with automatic sprinkler protection where all of the following conditions occur:

1. The *work area* is required to be provided with automatic sprinkler protection in accordance with the *International Building Code* as applicable to new construction; and
2. The *work area* exceeds 50 percent of the floor area.

**Exception:** If the building does not have sufficient municipal water supply for design and installation of a fire an automatic sprinkler system available to at the floor ~~without installation of a new fire pump site~~, work areas shall be protected by an automatic smoke detection system throughout all occupiable spaces other than sleeping units or individual dwelling units that activates the occupant notification system in accordance with Sections 907.4, 907.5 and 907.6 of the *International Building Code*.

**Reason:** This proposal is submitted by Fire and Life Safety Section of the International Association of Fire Chiefs.

The intent of this code change is to address the concern that the municipal water supply must be available at the floor level where the work area is located without the installation of a fire pump. The determining factor for an automatic fire sprinkler system should be whether there is adequate water, not whether a fire pump may be required when achieving an acceptable level of public safety.

This code change revises the text so that the adequacy of a municipal water supply at the building site is the determining factor. When the work area exceeds 50% of the floor area and a fire sprinkler system would be required. The possible installation of a fire pump to supplement the water flow and pressure is not the deciding factor when providing fire safety to the work area.

The revision to this exception will allow existing buildings to comply with this section by installing a smoke detection system in lieu of the fire sprinkler system where the volume and quantity of water at the site is not adequate to fulfill the fire sprinkler system requirements.

**Cost Impact:** Will increase the cost of construction

This code change will increase the cost of construction. The cost of fire pump will most likely exceed the cost of a smoke detection system. However, the same fire pump should be adequate for future fire sprinkler system installations in the building. Therefore, the fire pump will be a one-time cost for the building whereas

future alterations would require the installation of additional smoke detection systems.

EB59-15 : 804.2.2-  
ZUBIA4330

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** This proposal was viewed as excessive for a level 2 alteration. In addition, it works against the intent of the IEBC to encourage the reuse of buildings. A particular example of this concern was a building with a large site that technically has access to a municipal water supply but would require extensive site work to gain access to the water.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Adolf Zubia, representing Fire and Life Safety Section of the International Association of Fire Chiefs requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**804.2.2 Groups A, B, E, F-1, H, I, M, R-1, R-2, R-4, S-1 and S-2.** In buildings with occupancies in Groups A, B, E, F-1, H, I, M, R-1, R-2, R-4, S-1 and S-2, work areas that have exits or corridors shared by more than one tenant or that have exits or corridors serving an occupant load greater than 30 shall be provided with automatic sprinkler protection where all of the following conditions occur:

1. The *work area* is required to be provided with automatic sprinkler protection in accordance with the *International Building Code* as applicable to new construction; and
2. The *work area* exceeds 50 percent of the floor area.

**Exception:** If the building does not have sufficient municipal water supply for design and installation of an automatic sprinkler system available at to the site floor without installation of a new fire pump, work areas shall be protected by an automatic smoke detection system throughout all occupiable spaces other than sleeping units or individual dwelling units that activates the occupant notification system in accordance with Sections 907.4, 907.5 and 907.6 of the *International Building Code*.

**904.1.2 Groups A, B, E, F-1, H, I, M, R-1, R-2, S-1 and S-2.** In buildings with occupancies in Groups A, B, E, F-1, H, I, M, R-1, R-2, R-4, S-1 and S-2, work areas shall be provided with automatic sprinkler protection where the work area is required to be provided with automatic sprinkler

protection in accordance with the International Building Code as applicable to new construction.

**Exception:** If the building does not have sufficient municipal water supply for design and installation of an automatic sprinkler system available at the site, work areas shall be protected by an automatic smoke detection system throughout all occupiable spaces other than sleeping units or individual dwelling units that activates the occupant notification system in accordance with Sections 907.4, 907.5 and 907.6 of the International Building Code.

**Commenter's Reason:** This proposal is one of a group of three. During the Committee Action Hearing in Memphis, this proposal was Disapproved because it was felt to be too restrictive for Level 2 Alterations. At the same time, the Code Development Committee relocated a companion code change, EB61, from Chapter 8 to Chapter 9 agreeing that it is appropriate for Level 3 Alterations.

This Public Comment reinserts the current text into Section 804.2.2, so no change is made for Level 2 Alterations. The Public Comment also adds a new Section 904.1.2 to Chapter 9, which applies to Level 3 Alterations. The result is that for Level 3 Alterations, the fire sprinkler system is required as long as adequate water is available, whether or not a fire pump is needed, which is consistent with the action taken on EB61.

Section 804.2.2 Item 2 is not carried forward into the new Section 904.1.2. By definition, all Level 3 Alterations consist of a work area exceeding 50% of the building area, so Item 2 becomes unnecessary. Since only Item 1 is remaining, it is moved into the main requirement rather than being a numbered item.

The exception still applies which provides an alternate in situations where the water supply is inadequate for fire sprinkler design.

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EB59-15

# EB60-15

## 804.2.3

### **Proposed Change as Submitted**

**Proponent :** Adolf Zubia, IAFC Fire & Life Safety Section, representing IAFC Fire & Life Safety Section

### **2015 International Existing Building Code**

**Revise as follows:**

**804.2.3 Windowless stories.** Work located in a windowless story, as determined in accordance with the *International Building Code*, shall be sprinklered where the work area is required to be sprinklered under the provisions of the *International Building Code* for newly constructed buildings and the building site has a sufficient municipal water supply ~~without~~ for the design and installation of a new fire pump. an automatic sprinkler system.

**Reason:** This proposal is submitted by Fire and Life Safety Section of the International Association of Fire Chiefs.

The intent of this code change is to address the concept that the municipal water supply must be available at the floor level where the work area is located without the installation of a fire pump. The determining factor for an automatic fire sprinkler system should be whether there is adequate water, not whether a fire pump may be required when achieving an acceptable level of public safety.

This code change revises the text so that the adequacy of a municipal water supply at the building site is the determining factor. When the work area exceeds 50% of the floor area and a fire sprinkler system would be required. The possible installation of a fire pump to supplement the water flow and pressure is not the deciding factor when providing fire safety to the work area.

**Cost Impact:** Will increase the cost of construction

The cost of fire pump will be added to the cost of the fire sprinkler system. However, the same fire pump should be adequate for future fire sprinkler system installations in the building, therefore, the fire pump will be a one-time cost for the building and future alterations can take advantage of the fire pump supply.

EB60-15 : 804.2.3-  
ZUBIA4554

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### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** This proposal was disapproved based upon the reason provided for disapproval on EB59-15. The proposal was seen as excessive.

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : Adolf Zubia, representing Fire and Life Safety**

**Section (azubiamia@yahoo.com) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

**2015 International Existing Building Code**

**804.2.3 Windowless stories.** Work located in a windowless story, as determined in accordance with the *International Building Code*, shall be sprinklered where the work area is required to be sprinklered under the provisions of the *International Building Code* for newly constructed buildings and the building site has a sufficient municipal water supply ~~for the design and~~ without installation of an automatic sprinkler system a new fire pump.

**904.1.3 Windowless stories.** Work located in a windowless story, as determined in accordance with the International Building Code, shall be sprinklered where the work area is required to be sprinklered under the provisions of the International Building Code for newly constructed buildings and the building site has a sufficient municipal water supply for the design and installation of an automatic sprinkler system.

**Commenter's Reason:** This proposal is one of a group of three. During the Committee Action Hearing in Memphis, this proposal was Disapproved because it was felt to be too restrictive for Level 2 Alterations. At the same time, the Code Development Committee relocated a companion code change, EB61, from Chapter 8 to Chapter 9 agreeing that it is appropriate for Level 3 Alterations. This Public Comment reinserts the current text into Section 804.2.3, so no change is made for Level 2 Alterations. The Public Comment also adds a new Section 904.1.3 to Chapter 9, which applies to Level 3 Alterations. The result is that for Level 3 Alterations, the fire sprinkler system is required as long as adequate water is available, whether or not a fire pump is needed, which is consistent with the action taken on EB61.

By definition, Level 3 Alterations consist of a work area exceeding 50% of the building area. Therefore, this fire sprinkler requirement will only apply when more than 50% of the building is undergoing alteration, and the IBC would require the installation of fire sprinkler for new construction.

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EB60-15

# EB61-15

## 804.2.4

### **Proposed Change as Submitted**

**Proponent :** Adolf Zubia, IAFC Fire & Life Safety Section, representing IAFC Fire & Life Safety Section

## **2015 International Existing Building Code**

**Revise as follows:**

**804.2.4 Other required automatic sprinkler systems.** In buildings and areas listed in Table 903.2.11.6 of the *International Building Code*, *work areas* that have exits or corridors shared by more than one tenant or that have exits or corridors serving an occupant load greater than 30 shall be provided with an automatic sprinkler system under the following conditions:

1. The *work area* is required to be provided with an automatic sprinkler system in accordance with the *International Building Code* applicable to new construction; and
2. The building site has sufficient municipal water supply for design and installation of an automatic sprinkler system ~~available to the floor without installation of a new fire pump.~~

**Reason:** This proposal is submitted by Fire and Life Safety Section of the International Association of Fire Chiefs.

The intent of this code change is to address the concern that the municipal water supply must be available at the floor level where the work area is located without the installation of a fire pump. The determining factor for an automatic fire sprinkler system should be whether there is adequate water at the site, not whether a fire pump may be required when achieving an acceptable level of public safety.

This code change revises the text so that the adequacy of a municipal water supply at the building site is the determining factor. When the work area exceeds 50% of the floor area and a fire sprinkler system would be required. The possible installation of a fire pump to supplement the water flow and pressure would not be the deciding factor when providing fire safety to the work area.

**Cost Impact:** Will not increase the cost of construction

The cost of fire pump will be added to the cost of the fire sprinkler system. However, the same fire pump should be adequate for future fire sprinkler system installations in the building, therefore, the fire pump will be a one-time cost for the building and future alterations.

EB61-15 : 804.2.4-  
ZUBIA4550

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### **Public Hearing Results**

**Committee Action:**

**Approved as Modified**

**Modification:**

~~804.2.4~~**904.1.4 Other required automatic sprinkler systems.***No change to text.*

**Committee Reason:** This proposal was seen as reasonable but only if moved to the Level 3 alterations provisions. The modification simply moved the section from Section 804.2.4 to Section 904.1.4 bringing the provisions into Level 3 alterations.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Steven Orlowski, representing Building Owners and Managers Association, International (sorlowski@boma.org) requests Disapprove.**

**Commenter's Reason:** Both the original proposal and the modification failed to provide any technical justification or need to remove the allowance of not requiring a suppression system to be installed in an existing building, if a fire pump must be installed to supplement inadequate water flow and pressure. This might be in part since according to the latest NFPA reports, non-residential structures fires have shown a continued decrease in the number of fires reported annually. The proposal also fails to accurately assess the cost increases that will occur with this proposed code change. According to the reason statement, the proposal states that there will be no increase to the cost of construction and that the cost of the fire pump will be included in the cost of the fire suppression system. How could this code change not increase the cost of construction, when the code would now require suppression systems to be installed in buildings that previously would have not been required to install the suppression system? Not to mention that there will undoubtedly be additional cost associated with making sure that the existing fire alarm system will be able to accommodate the connection of the new waterflow alarms, tamper switches and other monitoring equipment that will be installed with the automatic sprinkler system. Also, keep in mind that most existing buildings water systems were designed and sized to meet the domestic demand and these waterlines are inadequate to accommodate the design flow required for the suppression system. This change would require the existing waterline to either be replaced or provide a supplemental waterline to serve the fire suppression system. According to a 2012 "Fire Flow Water Consumption" report prepared for the Fire Protection Research Foundation, tap fees alone can range from \$15,000 to \$80,000 for a 4-inch connection and that doesn't include the physical cost of installing a new waterline or replacing an existing system connection. BOMA encourages the assembly to disapprove the action by the committee and continue to allow the existing building code to take into account that when the design and installation of an automatic suppression system would require a fire pump to reach the work areas of a level II alteration (in buildings other than high-rises), that a sprinkler system will not be required.

### *Public Comment 2:*

**Proponent : Adolf Zubia, representing Fire and Life Section of the International Association of Fire Chiefs requests Approve as Modified by this Public Comment.**

**Further Modify as Follows:**

## **2015 International Existing Building Code**

**804.2.4 Other required automatic sprinkler systems. In buildings and areas listed in Table 903.2.11.6 of the International Building Code, work areas that have exits or corridors shared by more than one tenant or that**

have exits or corridors serving an occupant load greater than 30 shall be provided with an automatic sprinkler system under the following conditions:

1. The work area is required to be provided with an automatic sprinkler system in accordance with the International Building Code applicable to new construction; and
2. The building has sufficient municipal water supply for design and installation of an automatic sprinkler system available to the floor without installation of a new fire pump.

**904.1.4 Other required automatic sprinkler systems.** In buildings and areas listed in Table 903.2.11.6 of the *International Building Code*, ~~work areas that have exits or corridors shared by more than one tenant or that have exits or corridors serving an occupant load greater than 30~~ shall be provided with an automatic sprinkler system under the following conditions:

1. The *work area* is required to be provided with an automatic sprinkler system in accordance with the *International Building Code* applicable to new construction; and
2. The building site has sufficient municipal water supply for design and installation of an automatic sprinkler system.

**Commenter's Reason:** This proposal is one of a group of three. During the Committee Action Hearing in Memphis, this proposal was Approved as Modified by relocating it to Chapter 9 for Level 3 Alterations. When the relocation occurred, the requirement for fire sprinklers in Chapter 8 was lost.

This Public Comment reinserts the text in Section 804.2.4 with no change in the language found in the 2015 IEBC. Section 804.2.4 will retain the exception for elimination of the fire sprinkler requirement when a fire pump would be needed in the Level 2 Alterations.

The new text in Section 904.1.4 is also revised. This is done to correlate with Section 901.2. IEBC Section 901.2 currently reads:

901.2 Compliance. In addition to the provisions of this chapter, work shall comply with all of the requirements of Chapters 7 and 8. The requirements of Section 803, 804 and 805 shall apply within all work areas whether or not they include exits and corridors shared by more than one tenant and regardless of the occupant load.

Exception: Buildings in which the reconfiguration of space affecting exits or shared egress access is exclusively the result of compliance with the accessibility requirements of Section 705.2 shall not be required to comply with this chapter.

The second sentence in Section 901.2 already states that the requirements apply regardless of occupant load, and regardless of shared exits or shared corridors.

Therefore, that phrase in Section 904.1.4 is deleted. For the Level 3 Alterations which consist of alteration of 50% or more of the floor, the issue is whether or not the site has enough water for the design of the fire sprinkler system.

The end result is that the language in IEBC Section 804.2.4 is retained, and the new Section 904.1.4 is added for Level 3 Alterations. For Level 3 Alterations, the fire sprinkler system is required as long as adequate water is available, whether or not a fire pump is needed, for Level 2 Alterations, Exception 2 would eliminate the requirement for the fire sprinkler system if a fire pump is required.



# EB65-15

## 906.2

### **Proposed Change as Submitted**

**Proponent:** Dominic Marinelli, representing United Spinal Association (dmarinelli@accessibility-services.com)

## **2015 International Existing Building Code**

### **Revise as follows:**

**906.2 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered.

~~**Exception:** Group I-1, I-2, R-2, R-3 and R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 15, 1991 are not required to provide Type B dwelling or sleeping units.~~

**Reason:** The purpose of this code change proposal is to eliminate a conflict in the IEBC between the requirements in the Prescriptive and Work Area methods. The deletion of the exception to Section 906.2 would coordinate with Section 410.8.8. The intent is to coordinate the requirements for Type B dwelling units within the options available in the IEBC.

In the prescriptive method, Section 906.2 requirement is found in the 2nd sentence of Section 410.8.8. (The first sentence matches IEBC Section 1105.4).

**410.8.8 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being added, the requirements of Section 1107 of the International Building Code for Type B units apply only to the quantity of the spaces being added.

Where Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered and where the work area is greater than 50 percent of the aggregate area of the building, the requirements of Section 1107 of the International Building Code for Type B units apply only to the quantity of the spaces being altered.

United Spinal does not support the exception to Section 906.2, and believes it should be deleted for several reasons.

The current exception to Section 906.2 includes a March 15, 1991 as a trigger date. This was inserted as a coordination item with Fair Housing Act (FHA) requirements. However, this is not quite correct. It will be extremely difficult for code officials to determine as the first certificate of occupancy date is different than the date of First Occupancy as defined by the Fair Housing Accessibility Guidelines (i.e., the date that tenants first occupied their apartments). Adding a trigger date would require additional research by the architect or code official to determine if these code requirements were applicable or not. While the jurisdiction does hold records of certificate of occupancy, they do not information on actual occupancy of a space.

In addition, even if this was a match, including the trigger date of the FHA could significantly reduce the number of buildings where these basic adaptability features are required. Remember that these are already major alterations, not minor fixes. In instances where existing structure would prevent compliance with Type B features, permit applicants can take advantage of the technical infeasibility exception offered in the IEBC. It should be noted that Section 410.7 Exception 5 and 705.2 Exception 5 already exempts the building from improving the accessible route, so this

requirement is only for the element being altered.

The intent of the original requirement was to require adaptable Type B features in Level III alterations. This requirement will allow for basic adaptations to be made in the Type B unit in the future (but will not require accessible turning spaces, removable base cabinets, maneuvering clearance at bedroom and bathroom doors, or the installation of grab bars).

**Cost Impact:** Will not increase the cost of construction  
This proposal as it will match current language in Section 410.8.8.

EB65-15 : 906.2-  
ROETHER5445

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## **Public Hearing Results**

**Committee Action:** **Approved as Submitted**

**Committee Reason:** The committee approved the proposal for consistency on the action on EB44-15. In addition, determining the certificate of occupancy for existing buildings can be problematic in smaller jurisdictions.

**Assembly Action :** **None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Dan Buuck, representing National Association of Home Builders (dbuuck@nahb.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**906.2 Type B dwelling or sleeping units.** Where four or more Group I-1, I-2, R-1, R-2, R-3 or R-4 dwelling or sleeping units are being altered, the requirements of Section 1107 of the *International Building Code* for Type B units and Chapter 9 of the *International Building Code* for visible alarms apply only to the quantity of the spaces being altered.

**Exception:** Group I-1, I-2, R-2, R-3 and R-4 dwelling or sleeping units where the first certificate of occupancy was issued before March 14, 1991 are not required to provide Type B dwelling or sleeping units.

**Commenter's Reason:** The purpose of the proposed exception is to align the code with the Fair Housing Act. For reference, FHA regulations state "The design requirements apply to buildings built for first occupancy after March 13, 1991, which fall under the definition of "covered multifamily dwellings."

The committee reason states a concern that this exception would be included in the prescriptive method AND the work area method, as if that was problematic. Actually this exception should apply to both instances, because that would align both methods with the FHA and avoid confusion.

The second reason which the committee discussed was that determining when the certificate of occupancy was issued. This is not as big of a challenge as some made

it out to be. The vast majority of counties have this information available if the Department of Building Safety doesn't. Most areas of a town or city fall into certain decades of construction anyway, making it clear that a house was occupied long before (or after) the cut-off date.

Note the only modification made to the original code text was a minor adjustment to the date in order to bring it fully in line with the FHA provision. See the similar public comment for EB 44-15.

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**EB65-15**

# EB66-15

## 906.3 (New)

### **Proposed Change as Submitted**

**Proponent :** Gene Boecker, representing Code Consultants, Inc.  
(geneb@codeconsultants.com)

## **2015 International Existing Building Code**

**Add new text as follows:**

**906.3 Accessible means of egress** At least one accessible means of egress shall be provided from each story of each work area to the exit discharge in accordance with the requirements of Section 1009 of the *International Building Code* unless technically infeasible.

### **Exceptions:**

1. Historic Buildings.
2. Buildings three stories or less in height where the building does not require an automatic sprinkler system throughout in accordance with Section 903 of the *International Building Code*.

**Reason:** The proposal seeks to add a requirement for an accessible means of egress (AMOE) in existing buildings. Changes are being proposed only for buildings with a Level 3 alteration. This means that at least 50 percent of the building is involved in an alteration, based on the descriptions in Chapter 5. The proposal also includes language to exempt full compliance for the AMOE where it is technically infeasible. This might be the case where the elevator would normally be required as a part of the AMOE and the hoistway shaft would need to be modified on floors beyond the work area or where such an alteration could possibly leave the building structurally unsound. Section 906.1, within the same main Section where this new code language would be located, requires the alteration to comply with Section 705. Section 705.1 already addresses the concept of technically infeasible and how it works within existing buildings.

Two exceptions are offered to this new section. The first exempts historic buildings. The complexity with which these buildings must be addressed means that it is not practical to provide an AMOE in addition to the general requirements for accessibility in an historic building. The second exception recognizes the potential costs associated with trying to create an AMOE in smaller existing buildings. If the building is small enough that automatic fire sprinklers are not required, then the creation of fire rated areas of refuge could be a considerable cost imposition. However, if the smaller building is required to be protected throughout with an automatic fire sprinkler system, then areas of refuge are not required and the existing and/or new stairways can be used as part of the AMOE.

The ICC is responsible for establishing what the minimum level of safety is for new and existing buildings. The codes contain requirements for "access" for everyone, including the disabled, for both new and existing buildings. However, for existing buildings, the codes seem lacking in concern for the safety of those in the disabled community with regard to building "egress." With over 25 years of the ADA and many more years of accessibility provisions in the legacy codes, it is now time that the ICC recognize this need and include language regarding accessible means of egress for existing buildings. To do otherwise is to ignore the life safety of an entire group of the public, as well as employees, in existing buildings undergoing substantial renovation.

**Cost Impact:** Will increase the cost of construction

The degree of cost increase is variable. For some Level 3 alterations, the cost would be negligible if not nonexistent since a larger building will be protected throughout with an automatic fire sprinkler system, the elevator will be required to be on standby power and tactile exit signs would be required. In some instances the cost could be greater, depending on where the alteration work areas are located within the building. Therefore, it is not possible to offer a specific range of what the possible cost increase could be. The exceptions included in the proposal and the concept of "technically infeasible" are also options which will temper any substantial costs. Additionally, the question must be asked what the appropriate cost for the lives that can be saved if an accessible means of egress is provided.

EB66-15 : 906.3 (New)-  
BOECKER5665

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** This proposal was seen as excessive and would be costly even though it was located with the level 3 alteration provisions. There was concern that the cost limits typically used for accessible route would not be applicable to accessible means of egress as written. Finally, there was concern with the reference to Section 1009 of the IBC. Section 1009 has an exception for existing buildings. Note that E34-15 addresses that particular exception.

**Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### *Public Comment 1:*

**Proponent : Gene Boecker, representing Code Consultants, Inc. (geneb@codeconsultants.com) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**906.3 Accessible means of egress** At least one accessible means of egress shall be provided from each story of each work area to the exit discharge in accordance with the requirements of Section 1009 of the *International Building Code* unless technically infeasible.

Alterations to provide an accessible means of egress shall provide access to the maximum extent technically feasible.

#### **Exceptions:**

1. Historic Buildings.
2. Buildings three stories or less in height where the building does not require an automatic sprinkler system throughout in accordance with Section 903 of the *International Building Code*.
3. The cost of providing the accessible means of egress through the existing building shall not be required to exceed five percent (5%) of the costs of the addition.

**Commenter's Reason:** The opposition to the effort to provide an accessible means

of egress in an existing building seems to rest upon expense. To address this, additional language has been proposed in this public comment to include a small percentage as the cut-off. This would have the effect of requiring something but not mandating a huge expense, even for Level 3 Alterations.

Comments during the committee hearing also included a possible conflict with Section 1009.1. However, E34-15 was approved with a modification by the committee. The original E34 proposal was to refer the reader to the IEBC. The committee chose instead to delete the exception altogether since it must be understood that existing buildings are subject to the IEBC. Therefore, there is no conflict with any text in the IBC. The IEBC is the proper place to address this issue.

If we cannot commit wholly to the concept of retrofitting one accessible means of egress, then at least let us commit to taking baby steps in this direction.

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**EB66-15**

# EB74-15

## 1401.2.4

### **Proposed Change as Submitted**

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## **2015 International Existing Building Code**

### **Revise as follows:**

**1401.2.4 Alterations and repairs.** ~~An existing building or portion thereof that does not comply with the requirements of this code for new construction shall not be altered or repaired in such a manner that results in the building being less safe or sanitary than such building is currently. If, in the alteration or repair, the current level of safety or sanitation is to be reduced, the portion altered or repaired shall conform to the requirements of Chapters 2 through 12 and Chapters 14 through 33 of the *International Building Code*.~~

**Reason:** This section does not work within the IEBC as it did in the IBC. Generally we do not want an alteration or repair reducing the level of safety or sanitation. As currently written it says "this code" when in fact it was focused upon the IBC. Reference is not needed back to the IBC in this case. The last sentence is again sending the user of the code back to the IBC when we told them already that they could not reduce their level of safety or sanitation. As modified it will simply provide a baseline that the user of this chapter must meet. These revisions are needed to correlate with the 2015 IBC that deleted Chapter 34 on existing buildings. This is considered a clarification of the application of the IEBC as it applies to alterations and repairs and will not change anything that is now required by the I-Codes. This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction  
This proposal will not increase the cost of construction as this revision is only a clarification of the current provisions.

EB74-15 : 1401.2.4-  
KULIK4903

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### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The main concern with this proposal was the deletion of the last sentence. In some cases existing buildings may have more conservative construction features than new buildings. Eliminating this sentence would eliminate

the ability to simply comply with the IBC.

**Assembly Action :**

**None**

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**Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

**2015 International Existing Building Code**

**1401.2.4 Alterations and repairs.** An *existing building* or portion thereof shall not be altered or repaired in such a manner that results in the building being less safe or sanitary than such building is currently.

**Exception:** Where the current level of safety or sanitation is proposed to be reduced, the portion altered shall conform to the requirements of the International Building Code.

**Commenter's Reason:** The initial proposal was meant only as a clarification. Concerns were raised that by losing the last sentence the ability to allow a reduction that would meet the current building code would be lost. Therefore, the concept was borrowed from Section 701.2 which allows reductions if compliance with the IBC is achieved.

**701.2 Conformance.** An existing building or portion thereof shall not be altered such that the building becomes less safe than its existing condition.

**Exception:** Where the current level of safety or sanitation is proposed to be reduced, the portion altered shall conform to the requirements of the International Building Code.

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**EB74-15**



# EB86-15

## 1401.6.17, Table 1401.6.17, 1401.6.17.1

### Proposed Change as Submitted

**Proponent :** Jeff Hugo, representing National Fire Sprinkler Association (hugo@nfsa.org)

## 2015 International Existing Building Code

### Revise as follows:

**1401.6.17 Automatic sprinklers.** Evaluate the ability to suppress or control a fire based on the installation of an automatic sprinkler system in accordance with Section ~~903.3.1.1~~ 903.3.1 of the *International Building Code*. "Required sprinklers" shall be based on the requirements of ~~this code.~~ the *International Building Code*. Under the categories and occupancies in Table 1401.6.17, determine the appropriate value and enter that value into Table 1401.7 under Safety Parameter 1401.6.17, Automatic Sprinklers, for fire safety, means of egress divided by 2, and general safety. High-rise buildings defined in Chapter 2 of the *International Building Code* that undergo a *change of occupancy* to Group R shall be equipped throughout with an automatic sprinkler system in accordance with Section 403 of the *International Building Code* and Chapter 9 of the *International Building Code*. Facilities in Group I-2 occupancies meeting Category a, b, c or f shall be considered to fail the evaluation.

**TABLE 1401.6.17  
SPRINKLER SYSTEM VALUES**

OCCUPANCY	CATEGORIES					
	a <sup>a</sup>	b <sup>a</sup>	c	d	e	f
A-1, A-3, F, M, R, S-1	-6	-3	0	<del>23</del>	<del>46</del>	6
A-2	-4	-2	0	<del>12</del>	<del>24</del>	4
A-4, B, E, S-2	-12	-6	0	<del>36</del>	<del>612</del>	12
I-2	NP	NP	NP	8	10	NP

NP = not permitted.

a. These options cannot be taken if Category a in Section 1401.6.18 is used.

-

**1401.6.17.1 Categories.** The categories for automatic sprinkler system protection are:

1. Category a—Sprinklers are required throughout the building; sprinkler protection is not provided. ~~or the sprinkler system design is not adequate for the hazard protected in accordance with Section 903 of the *International Building Code*.~~
2. Category b—Sprinklers are required in fire areas or compartments a portion of the building; sprinkler protection is not provided in fire areas or compartments, or the sprinkler system design is not adequate for the hazard protected in accordance with Section 903 of the *International Building Code*.
3. Category c—Sprinklers are not required; none are provided.
4. Category d—Sprinklers are required in ~~a portion of the building~~ fire areas or compartments; sprinklers are provided in fire areas or compartments ~~such portion~~; ~~the system is one that complied with the code at the time of installation and is maintained and supervised in accordance with Section 903 of the *International Building Code*.~~
5. Category e—Sprinklers are required throughout; sprinklers are provided throughout in accordance with Chapter 9 of the *International Building Code*.
6. Category f—Sprinklers are not required throughout; sprinklers are provided throughout in accordance with Chapter 9 of the *International Building Code*.

**Reason: History and Summary**

Fire sprinkler values was added to the BOCA version of Fire Safety Evaluation System (FSES) in the 1990 edition by code change number B270-89 (attached). This proposal created a table with two categories with the occupancy rows arranged the same as in the current IEBC. The first category (a) gave no credit for buildings without a sprinkler system and no credit for partial systems. The second category (b) provided values for fully sprinklered buildings according to the BOCA fire protection chapter (Article 10) which referenced NFPA 13 and NFPA 13R. Fully sprinklered buildings were given 4 points (A-2), 6 points (A-1, A-3, F, M, R, S-1) or 12 points (A-4, E, B, S-2). The values in the second category were established by other FSES processes (NFPA and NYC). These values were justified by the proponent as being equal to automatic alarm values.

In the 1996 BOCA, code change number B213-95 (attached), increased the two category value table to the current IEBC six category value table. The values in each of the six categories have been unchanged since this edition, with the exception of adding values for I-2 occupancies for the 2015 edition. The higher category values appear similar as the above version in 1990, with lower values in lower categories, however, this proposal discusses that the arrangement of the values do not do a fully sprinklered building justice as originally intended in the 1990 version.

Each proposed change is explained in detail below, however, to summarize, there was a significant and fundamental change on how these values were applied in the 1996 BOCA code. The 1990 values were for fully sprinklered buildings, but the 1996 values demoted these values for fully sprinklered buildings required to be sprinklered by the code (Category e). The full values, as intended by the 1990 text, was only given to buildings that were fully sprinklered voluntarily (Category f). The practice of constructing buildings as unsprinklered, (without any trade-offs) then adding a sprinkler system is virtually non-existent. The values in Category e and f of the 1996 BOCA to the 2015 IEBC are unjust and are not equal to the 1990 proponents' intent. This proposal adjusts the table accordingly.

Proposed Changes in Text

**"...or control..."**

This change correctly addresses automatic fire sprinkler systems for the majority of installations. Fire sprinkler systems designed according to NFPA 13, NFPA 13R and NFPA 13D are designed to control fires. There are a few instances in the NFPA 13 standard where the fire sprinkler is designed to suppress fires, such as in storage occupancies. It is appropriate to have "control" more than suppression in the code text, but this proposal leaves suppression in to accommodate the suppression in storage occupancies.

**" ...Section 903.3.1.1..."**

This change removes the limitation of the values to be used just on a NFPA 13 system. The values cannot be limited to just NFPA 13 systems. The intent of the proposal that expanded the values for 1996 BOCA did not prohibit NFPA 13R systems (B213-95), likewise, the values table has occupancies that are permitted to use NFPA 13R (R-1, R-2) and NFPA 13D (R-3, R-4) systems. When a building is sprinklered according to any of the sprinkler standards, they are considered fully sprinklered.

**" ...the International Building Code~~this code~~..."**

When this section was located in the IBC it also stated "this code". This section wasn't revised when it moved from the IBC to the IEBC. Every other section in Chapter 14 of the IEBC that has similar language refers to the IBC. For example, IEBC Section 1401.6.18 refers the requirements back to the IBC.

**" Category a - Sprinklers are required throughout the building; sprinkler protection is not provided, or the sprinkler system design is not adequate for the hazard protected in accordance with Section 903 of the International Building Code."**

This change updates and clarifies where sprinklers are throughout to make the user aware of the extent of sprinklers protection. The latter portion of the text is removed. The value assigned to this is extreme and is redundant with Category b. Having no sprinklers and an under-designed system is not equal. Both are detrimental, but one has no protection, the other has some form of protection. The penalty for an under-designed system should be a Category b and keep the unsprinklered building as the highest penalty.

**"Category b - Sprinklers are required in fire areas or compartments a portion of the building; sprinkler protection is not provided in fire areas or compartments..."**

This change provides a negative value when a fire area or compartment that is required to have sprinklers, but doesn't. Fire areas are defined in the IBC and "compartments" are used and qualified in Section 1401.6.3. These terms are concrete and have definite passive fire protection boundaries than the subjective term "portion". By using fire area and compartments, the code official and the user can be clear where sprinklers are supposed to be installed.

**"Category d - Sprinklers are required in fire areas or compartments a portion of the building; sprinklers are provided in fire areas or compartments, such as a portion of the building; the system is one that complied with the code at the time of installation and is maintained and supervised in accordance with Section 903 of the International Building Code."**

This change assigns the partial system for a fire area with a value. It also removes the undefined term "portion". Fire areas are defined in the IBC and "compartments" are used and qualified in Section 1401.6.3. These terms are concrete and have definite passive fire protection boundaries than the subjective term "portion" which will have differing boundaries by every user for every building that is evaluated. By using fire area and compartments, the code official and the user can be clear where sprinklers are supposed to be installed.

There are some occupancies, such as A-1, A-2, A-3 and A-4, that are only required to have sprinklers in the fire area. Other fire areas may not need fire sprinklers. This change would provide buildings with sprinklered fire areas some credit. The value would not apply to a partial systems for incidental uses or other partial or limited-area system installation. The value would only be applied when the fire areas that are supposed to have sprinklers are installed according to the appropriate standard, or when the compartment is sprinklered.

This proposal also removes the value that is assigned for the maintenance of the

system according to the edition of the standard when it was installed. The IBC and IFC along with NFPA 13 require the sprinkler system to be maintained according to NFPA 25. This may not have been clear when the proposal was drafted for the 1996 BOCA. NFPA 25 was a new standard in 1992 and while it was referenced by the BOCA Fire Prevention Code, the scope may not have been fully understood and enforcement was difficult if the BOCA Fire Prevention Code was not specifically adopted. Furthermore, a system that is currently maintained according to the NFPA 25 (as referenced by current IFC) should receive points in a higher category.

#### Changes to the Table

#### **Values in Category d**

The changes to Category d provide one half of the value for a (proposed) fully sprinklered building. These values would be applied when the required fire areas are sprinklered. As explained above, the term fire area is defined and have definite fire rated boundaries within the building.

#### **Values in Category e**

The changes to the values in Category e show a fully sprinklered building with the maximum value as it is in Category f. It should make no difference that a sprinkler system was required or voluntarily installed. A fully sprinklered building is installed with the same installation standards whether it was a required system or a non-required system. There are other values in Chapter 14 of the IEBC that gives "bonus" points when the code was exceeded. However, a fully sprinklered building can be "upgraded" beyond the minimum standard, but that is hard to quantify and justify when additional points are awarded. When a fire rating is increased it is easier to identify and view the upgrade.

When the sprinkler values were introduced in the 1990 BOCA they were for fully sprinklered buildings. There was no "bonus" points. The reduced values in the current IEBC Category e penalizes buildings that have required sprinkler systems.

**Cost Impact:** Will not increase the cost of construction  
Updating values may decrease the need to upgrade other construction features to meet the FSES.

EB86-15 : 1401.6.17-  
HUGO4760

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### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The proposal was disapproved with concern regarding the broadening of the application of these criteria to both NFPA 13R and 13D. In addition, the committee felt it was inappropriate for the scores for category e and f to be the same. One is for required systems (e) and the other if for non required systems (f). Generally, there was concern as to how these revisions will affect the mandatory safety scores.

**Assembly Action :**

**None**

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### **Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : Jeff Hugo, National Fire Sprinkler Association,  
representing National Fire Sprinkler Association (hugo@nfsa.org)**

requests Approve as Modified by this Public Comment.

Modify as Follows:

## 2015 International Existing Building Code

**TABLE 1401.6.17  
SPRINKLER SYSTEM VALUES**

OCCUPANCY	CATEGORIES					
	a <sup>a</sup>	b <sup>a</sup>	c	d	e	f
A-1, A-3, F, M, R, S-1	-6	-3	0	<del>2</del> -4	<del>4</del> 6	6
A-2	-4	-2	0	<del>1</del> 2	<del>2</del> -4	4
A-4, B, E, S-2	-12	-6	0	<del>3</del> 6	<del>6</del> 12	12
I-2	NP	NP	NP	8	10	NP

NP = not permitted.

a. These options cannot be taken if Category a in Section 1401.6.18 is used.

**Commenter's Reason:** This PC changes the table back to the original values. The remainder of the proposal is as originally proposed. The committee vote was close on this proposal (7-6). One of their concerns was that this proposal opens up to NFPA 13R and NFPA 13D. NFPA 13R and NFPA 13D are systems that permitted to be used by the IBC for new and existing construction. NFPA 13R is specifically referenced by the IEBC and is permitted for residential occupancies up to four stories and sixty feet in height. NFPA 13D is permitted by the IBC for R-3, R-4 Condition 1, and care facilities. Section 1401.1 of the IEBC states that Sections 1401.2.1 through 1401.2.5 applies to all R occupancies. If this is the case, then the sprinkler systems that are permitted for new and existing construction should be included.

This public comment removes the increases and modifications to the values in the table. The entire set of values, throughout Chapter 14, need to be updated and all of the values need to be adjusted across the board. As stated in the original reason statement, many of the values are 20-plus years old and do not consider many aspects and building practices that have evolved over the past 30 years.

The committee vote was 7-6 and the discussion on the changes to the text to current text was unopposed by the committee and those in attendance.

# EB88-15

## Table 1401.6.17

### Proposed Change as Submitted

**Proponent :** Jeff Hugo, National Fire Sprinkler Association, representing National Fire Sprinkler Association (hugo@nfsa.org)

## 2015 International Existing Building Code

Revise as follows:

**TABLE 1401.6.17  
SPRINKLER SYSTEM VALUES**

OCCUPANCY	CATEGORIES					
	a <sup>a</sup>	b <sup>a</sup>	c	d	e <sup>b</sup>	f <sup>b</sup>
A-1, A-3, F, M, R, S-1	-6	-3	0	2	4	6
A-2	-4	-2	0	1	2	4
A-4, B, E, S-2	-12	-6	0	3	6	12
I-2	NP	NP	NP	8	10	NP

NP = not permitted.

a. These options cannot be taken if Category a in Section 1401.6.18 is used.

b. Increase values by 2 when fast or quick response sprinklers are used throughout or 3 when these sprinklers are used as part of an early suppression design method.

**Reason:** This proposal increases the values in category e and f by two when quick response or fast response sprinklers are used. This section has not been updated for almost 20 years. Since then use of quick response sprinklers has increased and is required by the IBC and NFPA 13. This technology has reduced the sprinkler response time dramatically but may not have been as widely known or used today as it was when these sections were introduced over 25 years ago in the BOCA code. Increasing the values for these type of sprinklers is common and consistent with the other FSES used, such as NFPA 101A.

Fast response sprinklers are defined in NFPA 13. Sprinklers that are considered fast have a quick response thermal element. These sprinklers are as follows: Quick Response (QR), Extended Coverage Quick Response (QREC), Residential, Early Suppression Quick Response (ESFR), and Quick Response Early Suppression (QRES) sprinklers.

This proposal also proposes to increase the value by three when quick response or fast response sprinklers are used in a early suppression design method. Many

storage buildings today utilize fire sprinkler designs that use the ESFR (Early Suppression Fast Response) or QRES (Quick Response Early Suppression) sprinkler to extinguish building fires. These arrangements use large amounts of water to put out the fire rapidly.

The early suppression design method is also used in performance based designs that use fast response sprinklers to suppress fires rather than control fires. This option would be available to users who are using fire modeling and performance codes, such as ICC's Performance Code for Buildings and Facilities. In general, the area consumed by the fire is smaller in a suppression scenario than in a control mode scenario. Of course, both options apply water to a fire automatically, limiting the area of the fire.

**Cost Impact:** Will not increase the cost of construction  
 The cost of the fast or quick response sprinklers may cost more in the initial phase of construction but reduces the need for other construction features.

EB88-15 : T1401.6.17-  
 HUGO5104

### **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The concept of providing credit for the use of ESFR sprinkler systems was appropriate for non required systems but not for required systems. In terms of quick response sprinklers, there was concern that these are already required in residential occupancies and it did not seem appropriate to provide additional credit through reference to this footnote.

**Assembly Action :**

**None**

### **Individual Consideration Agenda**

*Public Comment 1:*

**Proponent : Jeff Hugo, National Fire sprinkler Association, representing National Fire Sprinkler Association (hugo@nfsa.org) requests Approve as Modified by this Public Comment.**

**Modify as Follows:**

### **2015 International Existing Building Code**

**TABLE 1401.6.17  
 SPRINKLER SYSTEM VALUES**

<b>OCCUPANCY</b>	<b>CATEGORIES</b>					
	<b>a<sup>a</sup></b>	<b>b<sup>a</sup></b>	<b>c</b>	<b>d</b>	<b>e<sup>b</sup></b>	<b>f<sup>b</sup></b>
A-1, A-3, F, M, R, S-1	-6	-3	0	2	4	6

A-2	-4	-2	0	1	2	4
A-4, B, E, S-2	-12	-6	0	3	6	12
I-2	NP	NP	NP	8	10	NP

NP = not permitted.

a. — These options cannot be taken if Category a in Section 1401.6.18 is used.

b. Increase values by 2 when ~~fast or quick response sprinklers are used throughout or 3 when these sprinklers are used as part of an early suppression design method-~~

**Commenter's Reason:** This public comment changes the original proposal to match the desire of the committee. The committee directed that the extra points in the values would only apply to Column F. The committee also wanted to limit the value increase by two for the early suppression fast response design method.

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**EB88-15**



# EB93-15

## [BE] 1508.1

### **Proposed Change as Submitted**

**Proponent:** Edward Kulik, Chair, representing Building Code Action Committee (bcac@iccsafe.org)

## **2015 International Existing Building Code**

### **Revise as follows:**

**[BE] 1508.1 Construction sites.** Structures, sites, and equipment directly associated with the actual process of construction, including but not limited to scaffolding, bridging, material hoists, material storage, or construction trailers are not required to ~~be accessible.~~ comply with Chapter 11 of the IBC.

**Reason:** The intent is to coordinate IEBC Section 1508.1 with the new language in IBC Section 1103.2.5.

IBC Section 1103.2.5 reads as follows:

**1103.2.5 Construction sites.** Structures, sites and equipment directly associated with the actual processes of construction including, but not limited to, scaffolding, bridging, materials hoists, materials storage or construction trailers are not required to comply with this chapter.

In July/2014 the ICC Board decided to sunset the activities of the Code Technology Committee (CTC). This is being accomplished by re-assigning many of the CTC Areas of Study to the applicable Code Action Committee (CAC). This proposal falls under the CTC Area of Study entitled IBC Coordination with the New ADAAG. Information on the CTC, including: the sunset plan; meeting agendas; minutes; reports; resource documents; presentations; and all other materials developed in conjunction with the CTC effort can be downloaded from the CTC website.

This public proposal is submitted by the ICC Building Code Action Committee (BCAC). The BCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance an assigned International Code or portion thereof. This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. Since its inception in July, 2011, the BCAC has held 13 open meetings and numerous workgroup calls which included members of the BCAC as well as any interested party to discuss and debate the proposed changes and the public comments. Related documentation and reports are posted on the BCAC website at: <http://www.iccsafe.org/cs/BCAC/Pages/default.aspx>.

**Cost Impact:** Will not increase the cost of construction

The proposal is a clarification of current requirements; therefore, there is no impact on the cost.

EB93-15 : [BE] 1508.1-  
KULIK3356

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## **Public Hearing Results**

**Committee Action:**

**Disapproved**

**Committee Reason:** The reference back to Chapter 11 is not needed.

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**Individual Consideration Agenda*****Public Comment 1:***

**Proponent : Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Submitted.**

**Commenter's Reason:** The ICC Building Code Action Committee requests approval of this proposal as submitted. The code committee felt that a pointer sending someone to the IBC to find out they did not have to do something was not needed. However, it should be noted that this is not a pointer, but an exception. We still believe the new language is more precise and clear. The intent is to coordinate IEBC Section 1508.1 with the new language in IBC Section 1103.2.5. IBC Section 1103.2.5 reads as follows:

1103.2.5 Construction sites. Structures, sites and equipment directly associated with the actual processes of construction including, but not limited to, scaffolding, bridging, materials hoists, materials storage or construction trailers are not required to comply with this chapter.

**EB93-15**