

October 21, 2010

Mr. Steve Calhoun  
Department of Housing and Community Development  
Regulatory Coordinator  
Main Street Centre  
600 East Main Street, Suite 300  
Richmond, Virginia 23219

Dear Mr. Calhoun;

In accordance with the Code of Virginia, section § 2.2-4007.06 of the Administrative Process Act, and on behalf of the individuals represented on the attached petition, we are requesting the Board of Housing and Community Development to reconsider a change to the Uniform Statewide Building Code published in the Virginia Register September 27, 2010.

The code change of concern is 13VAC5-63-245 Section "B" dealing with USBC section 1005.1.

This code section was not properly vetted through the work group process and there was no opportunity for public comment. The change made by the Codes and Standards Committee did not receive full benefit of discussion and the change has considerable impact on the safety of persons who occupy these types of structures. We look forward to properly discussing the change in an open forum or with the Board of Housing and Community Development.

Respectfully,

Charles E. Altizer, P.E.  
State Fire Marshal

~~915.2.3 [915.2.3 915.1.3]~~ Inspection. In accordance with Section 113.3, all installations shall be inspected prior to commencement.

[~~Q. U.~~] Add Section ~~915.2~~ [915.3 915.2] to the IBC to read:

~~915.3 [915.3 915.2]~~ Acceptance test. Upon completion of installation, after providing reasonable notice to the owner or their representative, emergency public safety personnel shall have the right during normal business hours, or other mutually agreed upon time, to enter onto the property to conduct field tests to verify that the required level of radio coverage is present at no cost to the owner. Any noted deficiencies [in the installation of the radiating cable or operational space] shall be provided in an inspection report to the owner or the owner's representative.

13VACS-63-245, Chapter 10 Means of egress.

A. Change Section 1004.3 of the IBC to read:

1004.3 Posting of occupant load. Every room or space that is an assembly occupancy and where the occupant load of that room or space is 50 or more shall have the occupant load of the room or space posted in a conspicuous place, near the main exit or exit access doorway from the room or space. Posted signs shall be of an approved legible permanent design and shall be maintained by the owner or authorized agent.

B. Change Exception 3 of Section 1007.3 of the IBC to read:

~~3. The clear width of 48 inches (1219 mm) between handrails and the area of refuge is not required at exit stairways in buildings or facilities equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2.~~

C. Change Section 1007.4 of the IBC to read:

~~1007.4 Elevators. In order to be considered part of an accessible means of egress, an elevator shall comply with the emergency operation and signaling device requirements of Section 2.27 of ASME A17.1. Standby power shall be provided in accordance with Sections 709.2 and 709.3. The elevator shall be accessed from either an area of refuge complying with Section 1007.6 or a horizontal exit.~~

~~Exceptions:~~

- ~~1. Elevators are not required to be accessed from an area of refuge or horizontal exit in open parking garages.~~
- ~~2. Elevators are not required to be accessed from an area of refuge or horizontal exit in buildings and facilities equipped throughout with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2.~~

D. ~~B.~~ Change Section 1005.1 of the IBC to read:

~~1005.1 Minimum required egress width. The means of egress width shall not be less than required by this section. The total width of means of egress in inches (mm) shall not be less than the total occupant load served by the means of egress multiplied by 0.3 inches (7.62 mm) per occupant for stairways and by 0.2 inches (5.08 mm) per occupant for other egress components. The width shall not be less than specified elsewhere in this code. Multiple means of egress shall be sized such that the loss of any one means of egress shall not reduce the available capacity to less than 50% of the required capacity. The maximum capacity required from any story of a building shall be maintained to the termination of the means of egress.~~

~~Exceptions:~~

- ~~1. Means of egress complying with Section 1028.~~
- ~~2. For occupancies other than Groups H-1, H-2, H-3, H-4 and I-2, in buildings equipped with an automatic sprinkler system installed in accordance with Section 903.3.1.1 or 903.3.1.2, the total width of means of egress in inches (mm) shall not be less than the total occupant load served by the means of egress multiplied by 0.2 inches (5.08 mm) per occupant for stairways and by 0.15 inches (3.81 mm) per occupant for other egress components.~~

E. Change Section 1007.2 of the IBC to read:

~~1007.2 Continuity and components. Each required accessible means of egress shall be continuous to a public way and shall consist of one or more of the following components:~~

- ~~1. Accessible routes complying with Section 1104.~~
- ~~2. Interior exit stairways complying with Sections 1007.3 and 1022.~~
- ~~3. Exterior exit stairways complying with Sections 1007.3 and 1026 and serving levels other than the level of exit discharge.~~
- ~~4. Elevators complying with Section 1007.4.~~
- ~~5. Platform lifts complying with Section 1007.5.~~
- ~~6. Horizontal exits complying with Section 1025.~~
- ~~7. Ramps complying with Section 1010.~~
- ~~8. Areas of refuge complying with Section 1007.6.~~
- ~~9. Exterior area for assisted rescue complying with Section 1007.7 serving exits at the level of exit discharge.~~

D. ~~J~~ Change Section 1007.6.2 of the IBC to read:

~~1007.6.2 Separation. Each area of refuge shall be separated from the remainder of the story by a smoke barrier complying with Section 709 or a horizontal exit complying~~