

Template for
Delivery of Comments
On Proposed Construction Codes of the District of Columbia 2013

List of

Reviewer(s)/Telephone #: Viral Amin/SmithGroupJJR - 202-974-4580

Jyutika Baheti - 202.736.5093/ 240.281.0172

2013 Code Reviewed: 12 DCMR A - IBC, Chap. 4 -- Special Detailed Requirements
Based Upon Use and Occupancy

Date: January 28, 2013

Section Reference	Title/Subject	Comment
403.5.1	Remoteness of interior exit stairways	High Rise Buildings: The requirement for the interior exit stairways separation by a distance not less than 30 feet (9144 mm) or not less than one-fourth of the length of the maximum overall diagonal dimension of the building or area to be served, whichever is less is struck out in its entirety. The reviewers concur as retaining this requirement may potentially conflict with Chapter 10 requirements. However, Chapter 10 requirements should be reviewed to ensure that the requirement for “separation of interior stairways separated by “not less than one-fourth of the length of the maximum overall diagonal dimension of the building” is retained.
403.6.1	Fire Service Access Elevator	The IBC 2012 provision: “In buildings with an occupied floor more than 120 feet (36 576 mm) above the lowest level of fire department

		<p>vehicle access, no fewer than two fire service access elevators, or all elevators, whichever is less, shall be provided in accordance with <u>Section 3007</u>. Each fire service access elevator shall have a capacity of not less than 3500 pounds (1588 kg)” is struck out in its entirety. The reviewers concur as the need for fire service access elevators, but will cause substantial hardship in planning and incur significant construction costs.</p>
Section 404.5	Smoke Control	<p>Consider adding an additional exception to this section which would permit omitting a costly atrium mechanical smoke exhaust system for buildings where the third story is completely separated from the two lower levels with no openings via 1 hour fire/smoke barrier. DCRA has already informally allowed this application to three story volumes on multiple projects through the DCRA variance process. Having it as a documented allowed exception will aid many buildings in the district that have 3 story openings.</p>
Section 422.2	Separation	<p>Consider modifying the required separation between the Ambulatory Care Facility and adjacent areas from simply a “fire partition” to a 1 hour fire/smoke barrier to provide consistent Ambulatory requirements between the IBC</p>

		<p>and NFPA 101. In many instances, the two codes are jointly referenced due to review by Joint Commission.</p> <p>In addition, consider adding an exception to allow egress to the adjacent non-ambulatory compartment if the 1 hour fire/smoke barrier is provided if the ambulatory care area is limited to less than 22,500 square feet.</p>
--	--	--

#12371744_v2

Template for
Delivery of Comments
On Proposed Construction Codes of the District of Columbia 2013

List of

Reviewer(s)/Telephone #: David Wilmot, Aon Fire Protection____
301-220-1212 / 202-412-0634_____

2013 Code Reviewed: 12 DCMR A, IBC - Chap. 4- Special Detailed Requirements Based
On Use and Occupancy

Date: January 28, 2013_____

Section Reference	Title/Subject	Comment
2012 IBC	Section 403.4.5 Emergency Responder Radio Coverage	<p>This section of the IBC requires the installation of in-building emergency responder radio coverage for all new high-rise buildings in accordance with the Fire Code. DCMR 12H offers no amendments to IFC Section 510 regarding this subject.</p> <p>What agency (DCRA / DC Fire & EMS) has authority over the matter? Will additional information be forthcoming from DC Fire & EMS?</p> <p>Without supplemental information in advance, this subject may pose challenges and confusion to the design community.</p>