MEMORANDUM

TO: NFPA Technical Committee on Educational and Day-Care Occupancies
FROM: Linda MacKay
DATE: October 25, 2010

The ROC letter ballot for NFPA 101 is attached. The ballot is for formally voting on whether or not you concur with the committee’s actions on the comments. Reasons must accompany all negative and abstention ballots.

Please do not vote negatively because of editorial errors. However, please bring such errors to my attention for action.

Please complete and return your ballot as soon as possible but no later than Wednesday, November 3, 2010. As noted on the ballot form, please return the ballot to Linda MacKay either via e-mail to lmackay@nfpa.org or via fax to 617-984-7110. You may also mail your ballot to the attention of Linda MacKay at NFPA, 1 Batterymarch Park, Quincy, MA 02169.

The return of ballots is required by the Regulations Governing Committee Projects.

Attachments: Comments
101-3  Log #9  SAF-END
(Occupancy Chapters xx.1.4 Subsection)  
Final Action: Accept in Principle

Submitter: Technical Correlating Committee on Safety to Life,
Comment on Proposal No: 101-12
Recommendation: Make any needed editorial changes to assure that the moved and renumbered text is correlated with the remainder of the chapter.
Substantiation: The action taken at the ROP stage by SAF-HEA will provide correlation among occupancy chapters, but may need to be correlated within each occupancy chapter.
Committee Meeting Action: Accept in Principle
Committee Statement: The editorial reformatting made at the ROP stage is an improvement. No new problems were introduced and nothing got lost.

101-102  Log #25  SAF-END
(8.5.4)  
Final Action: Accept in Principle

Submitter: Technical Correlating Committee on Safety to Life,
Comment on Proposal No: 101-177c
Recommendation: Review the TC’s occupancy chapter provisions applicable to smoke barriers and, if it is the TC’s desire, revise text so as to specifically exempt latching in the appropriate locations.
Substantiation: The occupancy chapters might need to be correlated with the change made to 8.5.4.
Committee Meeting Action: Accept in Principle
Committee Statement: The new requirement for the latching of smoke barrier doors is consistent with the intent of the provisions of the chapters for which SAF-END has purview given the committee action on Comment 101-171 which deletes the reference to "smoke barrier."
Masoud Sabounchi, Advanced Consulting Engineers, Inc.

101-185

Add new sections:

14.1.2.4 An atrium design and separation meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation.

15.1.2.4 An atrium design and separation meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation.

A.14.1.2.4/A.15.1.2.4 Where separation is provided between the atrium and an adjacent area where the adjacent area has a different occupancy, the separation in conjunction with the smoke control system provides separation equivalent to that required for occupancy separation. Where atrium is open to the adjacent area as permitted by 8.6.7 (b), there is no separation between the atrium and adjacent area and occupancy of both is considered to be the same. The noted provision would not be applicable where Provisions of 8.6.7 (b) are implemented.

Substantiation: Atrium enclosures are permitted to serve in lieu of vertical opening protection when provisions of 8.6.7 are met. Provisions of 8.6.7 outline how an atrium separation is constructed; it requires the building to be protected by an automatic sprinkler system throughout, smoke control system, etc. As such, the collection of the safety and fire protection features required to allow an atrium are equivalent to that of a shaft enclosure. Even though NFPA does not explicitly allow the atrium separations to be considered as occupancy separation, it considers the separation and the associated safety provisions equivalent to shaft enclosures. Otherwise, construction of an atrium would be construed as less safe than a shaft which is definitely not the case. The collection of the required safety features in construction of an atrium would be equivalent to a fire resistance rated shaft enclosure and should also be accepted as an occupancy separation.

In many cases the occupancy that needs separation from the atrium occurs on one level of the atrium and typically this separation is required at the first floor of the atrium. Regardless of the location of the occupancy that requires occupancy separation from the atrium, if the area containing that occupancy is separated from the atrium, other floors that have the same occupancy as the atrium should be regulated as required by 8.6.7.

Committee Meeting Action: Reject

Committee Statement: See the Committee Statement by SAF-FUN for the rejection of Comment 101-168, with which the SAF-END committee concurs.
14.1.2.4 An atrium separation meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation provided the atrium is separated from the adjacent spaces by fire barriers with not less than a 1-hour fire resistance rating with opening protective, penetrations, joints and air transfer openings as required for smoke partitions (see Section 8.4).

14.1.2.4.1 Glass walls and inoperable windows shall be permitted in lieu of fire barriers provided all the provisions of 8.6.7(1)(c) are met.

14.1.2.4.2 An atrium shall not be permitted to be used as an occupancy separation where any of the following conditions exist:

1. Where adjacent spaces are directly open to the atrium
2. Where an engineering analysis has not been performed to demonstrate that the building is designed to keep the smoke layer interface 6 feet above the highest floor level of exit access open to the atrium for a period equal to 1.5 times the calculated egress time or 20 minutes, whichever is less
3. Where an engineering smoke control system, installed to meet the requirements of 14.1.2.4.2(2), has not been equipped with a means to be independently activated by a required automatic sprinkler system and manual controls that are accessible to the fire department.

A. 14.1.2.4.2 Atriums need to be separated from adjacent occupancies so there is a defined location for measuring travel distance to the occupancy separation. Similar to the provisions of 8.6.7(5), an atrium should not be proposed as an occupancy separation unless safe egress can be demonstrated by an engineering analysis. Similar to 8.6.7(6), should the analysis reveal the need for a smoke control system, the smoke control system would need to be equipped with both an automatic and manual means of operation.

15.1.2.4 An atrium separation meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation provided the atrium is separated from the adjacent occupancy by fire barriers with not less than a 1-hour fire resistance rating with opening protective, penetrations, joints and air transfer openings as required for smoke partitions (see Section 8.4).

15.1.2.4.1 Glass walls and inoperable windows shall be permitted in lieu of fire barriers provided all the provisions of 8.6.7(1)(c) are met.

15.1.2.4.2 An atrium separation shall not be permitted to be used as an occupancy separation where any of the following conditions exist:

1. Where adjacent spaces are directly open to the atrium
2. Where an engineering analysis has not been performed to demonstrate that the building is designed to keep the smoke layer interface 6 feet above the highest floor level of exit access open to the atrium for a period equal to 1.5 times the calculated egress time or 20 minutes, whichever is less
3. Where an engineering smoke control system, installed to meet the requirements of 15.1.2.4.2(2), has not been equipped with a means to be independently activated by a required automatic sprinkler system and manual controls that are accessible to the fire department.

A. 15.1.2.4.2 Atriums need to be separated from adjacent occupancies so there is a defined location for measuring travel distance to the occupancy separation. Similar to the provisions of 8.6.7(5), an atrium should not be proposed as an occupancy separation unless safe egress can be demonstrated by an engineering analysis. Similar to 8.6.7(6), should the analysis reveal the need for a smoke control system, the smoke control system would need to be equipped with both an automatic and manual means of operation.

Substantiation: 101-185 introduces a new concept which permits atriums to be used as an occupancy separation, should an occupancy so choose, provided as a minimum, the atrium is designed in accordance with 8.6.7. Since atriums have always permitted to serve in lieu of up to 2 hr vertical openings protection when all the provisions of 8.6.7 are met, it seems logical that an atrium should also be used as an occupancy separation.

Though ROP-185 establishes the base provisions, in order for atriums to be used as occupancy separations in educational occupancies, the base provisions need to be further enhanced so the dangers associated with multiple floor openings are mitigated. That is why this provision can only be used if the atrium is completely separated from adjacent spaces (as opposed to what’s permitted for atriums by 8.6.7(1)(b), an engineering analysis is performed that...
demonstrates egress is safeguarded (per 8.6.7(5)) and that smoke control systems, if required to be provided based on the engineering analysis, can be activated both automatically and manually (per 8.6.7(6)). The applicable provisions from Section 8.4 have been added to ensure opening protectives, penetrations, joints and air transfer opening requirements are applied. Though a one hour fire barrier is the based requirement, an atrium that is separated from adjacent spaces by glass walls in conjunction with all seven requirements of 8.6.7(1)(c) should also suffice as an occupancy separation, since they already suffice for vertical opening protection.

Educational occupancies should have the option to use this provision. Similar proposals have been submitted for Assembly, Day Care, Health Care, Ambulatory Health Care, and Business occupancies.

Committee Meeting Action: Reject

Committee Statement: See the Committee Statement by SAF-FUN for the rejection of Comment 101-168, with which the SAF-END committee concurs.

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101-169  Log #174  SAF-END
(14.3.5.1)

Submitter: Kenneth E. Isman, National Fire Sprinkler Association, Inc.

Comment on Proposal No: 101-248


Substantiation: The threshold of 12,000 sq ft for unsprinklered occupancies was established many years ago by looking at the size of fires in buildings with ordinary contents and determining the likely ability of an average fire department's capability to provide the fire flow to fight a fire in that occupancy. Where the fire flow cannot be provided by the fire department, fire sprinklers need to be installed.

Mr. Kapalczynski is correct that Day Care Centers should not be exempt from this same limit. If the fire department can't get enough water to fight a fire in the occupancy, fire sprinklers should be installed.

Committee Meeting Action: Accept in Principle

Revise as follows:

Educational occupancy buildings exceeding 12,000 ft² (1120 m²) 20,000 ft² (1860 m²) shall be protected throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7.

A.14.3.5.1 It is the intent to permit use of the criteria of 8.2.1.3(1) to create separate buildings for purposes of limiting educational occupancy building area to not more than 12,000 ft² (1120 m²) 20,000 ft² (1860 m²).

Committee Statement: The committee action does what the submitter requested; shows the complete text, and makes the correlative change to the advisory annex text. However, the committee did not make the change for the reasons cited by the submitter. The submitter's reasons relate to fire fighter safety and property protection - subjects not within the purview of NFPA 101. The committee notes that current sprinkler technology has been shown to be effective in facilitating the objectives of the Life Safety Code for those occupants not intimate with initial fire development, as addressed by the goals of 4.1.1.

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101-170  Log #254  SAF-END
(14.3.5.1)

Submitter: Ignatius Kapalczynski, CT Office of State Fire Marshal

Comment on Proposal No: 101-248

Recommendation: Reconsider.

Substantiation: There is no technical justification for this occupancy sprinkler threshold to be 67% larger than all other occupancy thresholds.

Committee Meeting Action: Accept in Principle

See Committee Action on Comment 101-169.

Committee Statement: The action on the referenced comment accomplishes what the submitter requested.
Submitter: Daniel Starbuck, City of Gainesville, FL

Recommendation: Revise text as follows:

(5) Where the room or space complies with the following:

(a) At least two (2) doors shall exist that allow travel between either direct access to an exit in both directions, or access to an adjacent classroom or exit access corridor.

(b) Where the doors provide access to two adjacent classrooms, at least one of the adjacent classrooms shall be equipped with a door leading directly to the outside, or with a door to a separate smoke compartment or exit access corridor that provides access to another exit. Doors used to travel from classroom to classroom shall provide one of the following:

   i. Direct access to exits in both directions
   ii. Direct access to an exit in one direction and to a separate smoke compartment that provides access to another exit in the other direction

(c) The corridor shall be separated from the classrooms by a wall that resists the passage of smoke, and all doors between the classrooms and the corridor shall be self-closing or automatic-closing in accordance with 7.2.1.8.

(d) The length of travel to exits along such paths shall not exceed 150 ft (46 m).

(e) Each communicating door shall be marked in accordance with Section 7.10.

(f) No locking device shall be permitted on the communicating doors.

Substantiation: The code section as written is confusing because it requires doors to travel between classrooms, but also requires those same doors to provide “direct access to exits”. A door used to travel between classrooms cannot also provide direct access to the outside of the building. It is my interpretation that the intent of the code was to require each room to have two exits, with the intervening rooms being required to have either a direct exit to the outside, or direct access to an exit access corridor. (As illustrated in the attached diagram which was copied from page 529 of the 2006 edition of the NFPA Life Safety Code Handbook. The proposed code change in Section (b) clarifies the intent that the exiting requirements apply to the adjacent room, not to the connecting doors themselves. The code change also allows for the adjacent room to open directly to an exit access corridor, an option that is alluded to in (c), but not specifically listed as an option in (b). (See diagram below.)

*****Insert Diagram Here*****

Committee Meeting Action: Accept in Principle
Revise 15.2.11.1.2 as follows:

15.2.11.1.2 The requirements of 15.2.11.1.1 shall not apply to any of the following:

(1) Buildings protected throughout by an approved automatic sprinkler system in accordance with Section 9.7

(2) Where the room or space has a door leading directly to an exit or directly to the outside of the building

(3) Where the room has a door, in addition to the door that leads to the exit access corridor as required by 15.2.5.5, and such door leads directly to another corridor located in a compartment separated from the compartment housing the corridor addressed in 15.2.5.5 by smoke partitions in accordance with Section 8.4.

(4) (5) Rooms located four or more stories above the finished ground level

(5) Where awning-type or hopper-type windows... (no change)

(6) Where the room or space complies with all of the following:

   (a) One door providing direct access to an adjacent classroom and a second door providing direct access to another adjacent classroom shall be provided. Doors shall exist that allow travel between adjacent classrooms:

   (b) The two classrooms to which exit access travel is made in accordance with 15.2.11.1.2(6)(a) shall each provide exit access in accordance with 15.2.11.1.2(2) or 15.2.11.1.2(3). Doors used to travel from classroom to classroom shall provide one of the following:

      i. Direct access to exits in both directions
      ii. Direct access to an exit in one direction and to a separate smoke compartment that provides access to another exit in the other direction
(c) The corridor required by 15.2.5.5 and the corridor addressed by 15.2.11.1.2(3), if provided, shall be separated from the classrooms by a wall that resists the passage of smoke, and all doors between the classrooms and the corridor shall be self-closing or automatic-closing in accordance with 7.2.1.8.

(d) The length of travel to exits along such paths shall not exceed 150 ft (46 m).

(e) Each communicating door shall be marked in accordance with Section 7.10.

(f) No locking device shall be permitted on the communicating doors.

Revise Chapter 14, 14.2.11.1.2 as follows:

14.2.11.1.2 The requirements of 14.2.11.1.1 shall not apply to any of the following:

1. Buildings protected throughout... (no change)

2. Where the room or space has a door leading directly to an exit or directly to the outside of the building

3. Reserved

4. Rooms located four or more stories... (no change)

Committee Statement: The committee action revises the text of 15.2.11.1.2 (2) and existing (5), as well as adding a new item (3) to clarify intent. It is not the committee's intent that any existing arrangement that was judged to be in compliance with the current text be made non-complying by application of the next verbiage. The text changes are for clarification only.

A correlative change was made to 14.2.11.1.2(2) for consistency. A formatting change was made to insert an item "(3) Reserved" so that the provisions of 14.2.11.1.2 and 15.2.11.1.2 are parallel and line-up.

101-172 Log #190 SAF-END
(16.1.2.3, 17.1.2.3, A.16.1.2.3, and A.17.1.2.3)

Final Action: Reject

Submitter: Masoud Sabounchi, Advanced Consulting Engineers, Inc.
Comment on Proposal No: 101-185
Recommendation: Add new sections:

16.1.2.3 An atrium separation and design meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation.

17.1.2.3 An atrium separation and design meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation.

A.16.1.2.3/A.17.1.2.3 Where separation is provided between the atrium and an adjacent area where the adjacent area has a different occupancy, the separation in conjunction with the smoke control system provides separation equivalent to that required for occupancy separation. Where atrium is open to the adjacent area as permitted by 8.6.7 (b), there is no separation between the atrium and adjacent area and occupancy of both is considered to be the same. The noted provision would not be applicable where Provisions of 8.6.7 (b) are implemented.

Substantiation: Atriums enclosures are permitted to serve in lieu of vertical opening protection when provisions of 8.6.7 are met. Provisions of 8.6.7 outline how an atrium separation is constructed; it requires the building to be protected by an automatic sprinkler system throughout, smoke control system, etc. As such, the collection of the safety and fire protection features required to allow an atrium are equivalent to that of a shaft enclosure. Even though NFPA does not explicitly allow the atrium separations to be considered as occupancy separation, it considers the separation and the associated safety provisions equivalent to shaft enclosures. Otherwise, construction of an atrium would be construed as less safe than a shaft which is definitely not the case. The collection of the required safety features in construction of an atrium would be equivalent to a fire resistance rated shaft enclosure and should also be accepted as an occupancy separation.

In many cases the occupancy that needs separation from the atrium occurs on one level of the atrium and typically this separation is required at the first floor of the atrium. Regardless of the location of the occupancy that requires occupancy separation from the atrium, if the area containing that occupancy is separated from the atrium, other floors that have the same occupancy as the atrium should be regulated as required by 8.6.7.

Committee Meeting Action: Reject

Committee Statement: See the Committee Statement by SAF-FUN for the rejection of Comment 101-174, with which the SAF-END committee concurs.
Add the following text to the end of the existing annex as follows:

16.1.2.3 An atrium separation meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation provided the atrium is separated from the adjacent spaces by fire barriers with not less than a 1-hour fire resistance rating with opening protective, penetrations, joints and air transfer openings as required for smoke partitions (see Section 8.4).

16.1.2.3.1 Glass walls and inoperable windows shall be permitted in lieu of fire barriers provided all the provisions of 8.6.7(1)(c) are met.

16.1.2.3.2 An atrium shall not be permitted to be used as an occupancy separation where any of the following conditions exist:

1. where adjacent spaces are directly open to the atrium
2. where an engineering analysis has not been performed to demonstrate that the building is designed to keep the smoke layer interface 6 feet above the highest floor level of exit access open to the atrium for a period equal to 1.5 times the calculated egress time or 20 minutes, whichever is less
3. where an engineering smoke control system, installed to meet the requirements of 16.1.2.3.2(2), has not been equipped with a means to be independently activated by a required automatic sprinkler system and manual controls that are accessible to the fire department.

A.16.1.2.3.2 Atriums need to be separated from adjacent occupancies so there is a defined location for measuring travel distance to the occupancy separation. Similar to the provisions of 8.6.7(5), an atrium should not be proposed as an occupancy separation unless safe egress can be demonstrated by an engineering analysis. Similar to 8.6.7(6), should the analysis reveal the need for a smoke control system, the smoke control system would need to be equipped with both an automatic and manual means of operation.

17.1.2.3 An atrium separation meeting the requirements of 8.6.7 shall be permitted to serve as an occupancy separation provided the atrium is separated from the adjacent occupancy by fire barriers with not less than a 1-hour fire resistance rating with opening protective, penetrations, joints and air transfer openings as required for smoke partitions (see Section 8.4).

17.1.2.3.1 Glass walls and inoperable windows shall be permitted in lieu of fire barriers provided all the provisions of 8.6.7(1)(c) are met.

17.1.2.3.2 An atrium separation shall not be permitted to be used as an occupancy separation where any of the following conditions exist:

1. where adjacent spaces are directly open to the atrium
2. where an engineering analysis has not been performed to demonstrate that the building is designed to keep the smoke layer interface 6 feet above the highest floor level of exit access open to the atrium for a period equal to 1.5 times the calculated egress time or 20 minutes, whichever is less
3. where an engineering smoke control system, installed to meet the requirements of 17.1.2.3.2(2), has not been equipped with a means to be independently activated by a required automatic sprinkler system and manual controls that are accessible to the fire department.

A.17.1.2.3.2 Atriums need to be separated from adjacent occupancies so there is a defined location for measuring travel distance to the occupancy separation. Similar to the provisions of 8.6.7(5), an atrium should not be proposed as an occupancy separation unless safe egress can be demonstrated by an engineering analysis. Similar to 8.6.7(6), should the analysis reveal the need for a smoke control system, the smoke control system would need to be equipped with both an automatic and manual means of operation.

Substantiation: 101-185 introduces a new concept which permits atriums to be used as an occupancy separation, should an occupancy so choose, provided as a minimum, the atrium is designed in accordance with 8.6.7. Since atriums have always permitted to serve in lieu of up to 2 hr vertical openings protection when all the provisions of 8.6.7 are met, it seems logical that an atrium should also be used as an occupancy separation.

Though ROP-185 establishes the base provisions, in order for atriums to be used as occupancy separations in day care occupancies, the base provisions need to be further enhanced so the dangers associated with multiple floor openings are mitigated. That is why this provision can only be used if the atrium is completely separated from adjacent spaces (as opposed to what’s permitted for atriums by 8.6.7(1)(b), an engineering analysis is performed that
demonstrates egress is safeguarded (per 8.6.7(5)) and that smoke control systems, if required to be provided based upon the engineering analysis, can be activated both automatically and manually (per 8.6.7(6). The applicable provisions from Section 8.4 have been added to ensure opening protectives, penetrations, joints and air transfer opening requirements are applied. Though a one hour fire barrier is the based requirement, an atrium that is separated from adjacent spaces by glass walls in conjunction with all seven requirements of 8.6.7(1)(c) should also suffice as an occupancy separation, since they already suffice for vertical opening protection.

Day care occupancies should have the option to use this provision. Similar proposals have been submitted for Assembly, Educational, Health Care, Ambulatory Health Care, and Business occupancies.

Committee Meeting Action: Reject

Committee Statement: See the Committee Statement by SAF-FUN for the rejection of Comment 101-174, with which the SAF-END committee concurs.
<table>
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<th>101-175 Log #54 SAF-END</th>
<th>Final Action: Accept</th>
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<td>(16.6.2.4 and 16.6.2.4)</td>
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**Submitter:** James K. Lathrop, Koffel Associates, Inc.  
**Comment on Proposal No:** 101-  
**Recommendation:** Revise text to read as follows:  

| 16/17.6.2.4 Number and Type of Means of Escape. The number of means of escape shall comply with Section 24.2 and 16.6.2.4.1 through 16.6.2.4.4.  
| 16.6.2.4.1/17.6.2.4.1 In group day care homes, every story occupied by clients shall have not less than two remotely-located means of escape. The number and type of means of escape shall comply with section 24.2 and 16.6.2.4.1 through 16.6.2.4.4.  
| 16/17.6.2.4.2 Every room used for sleeping, living, recreation, education, or dining purposes shall comply with the following: have number and type of means of escape in accordance with 24.2.  
| (1) There shall be not less than two means of escape, not less than one of which shall be a door or stairway providing a means of unobstructed travel to the outside of the building at street or the finished ground level.  
| (2) The second means of escape shall be permitted to be a window in accordance with 16.2.11.1.  
| (3) No room or space that is accessible only by a ladder or folding stairs or through a trap door shall be occupied for living or sleeping purposes.  
| 16/17.6.2.4.3 No room or space that is accessible only by a ladder or folding stairs or through a trap door shall be occupied by clients.  
| 16/17.6.2.4.4 In group day-care homes where spaces on the story above the level of exit discharge are used by clients, that story shall have not less than one means of escape complying with shall be an exit discharging directly to the outside, and the second means of escape shall be permitted to be a window in accordance with 16.2.11.1 one of the following:  
| (1) A door leading directly to the outside with access to finished ground level.  
| (2) A door directly to an outside stair going to finished ground level.  
| (3) An interior stair leading directly outside with access to finished ground level, separated from other stories by a 1/2 hour fire barrier in accordance with Section 8.3.  
| (4) (Chapter 17 only) An interior stair leading directly outside with access to finished ground level, separated from other stories by a barrier that has been previously approved for use in a group day-care home.  
| 16/17.6.2.4.54 Where clients occupy a story below the level of exit discharge, that story shall have not less than one means of escape complying with shall be an exit discharging directly to the outside, the vertical travel to the finished ground level shall not exceed 8 ft (2440 mm), and the second means of escape shall be permitted to be a window in accordance with 16.2.11.1 one of the following:  
| (1) A door leading directly to the outside with access to finished ground level.  
| (2) A door leading directly to an outside stair going to finished ground level.  
| (3) A bulkhead enclosure complying with 24.2.7  
| (4) An interior stair leading directly outside with access to finished ground level, separated from other stories by a 1/2 hour fire barrier in accordance with Section 8.3.  
| (5) (Chapter 17 only) An interior stair leading directly outside with access to finished ground level, separated from other stories by a barrier that has been previously approved for use in a group day-care home.  

**Substantiation:** It appears that it was never the intent of the committee to require true exits in day care homes since the overall philosophy is that these are typically in dwellings. However, in group day-care homes where clients are on upper stories or in the basement, it is the desire to provide at least one protected path although it might not be a true exit. This rewrite uses the provisions from one- and two-family dwellings for the number and type of means of escape. This way the day care provisions do not have to be rewritten each time Chapter 24 is revised. The revisions to 16/17.6.2.4.1 and .2 are clean up to coordinate with Chapter 24. This comment is the result of a meeting between Cathy Stashak and the author of the comment as requested by the SAF-END committee during the ROP meeting. We have gone through several rewrites to assure limited impact on existing (recall the current code requires at least one exit from the second story or basement). This will significantly clarify the Code with minimal (if any) impact on existing.  
**Committee Meeting Action:** Accept
The number of means of escape shall comply with Section 24.2 and 16.6.2.4.1 through 16.6.2.4.4.

In group day-care homes, every story occupied by clients shall have not less than two remotely located means of escape. The number and type of means of escape shall comply with Section 24.2 and 16.6.2.4.1 through 16.6.2.4.4.

16.6.2.4.2 Every room used for sleeping, living, recreation, education, or dining purposes shall comply with the following: have number and type of means of escape in accordance with 24.2.

(1) There shall be not less than two means of escape, not less than one of which shall be a door or stairway providing a means of unobstructed travel to the outside of the building at street or the finished ground level.

(2) The second means of escape shall be permitted to be a window in accordance with 16/2.11.1.

(3) No room or space that is accessible only by a ladder or folding stairs or through a trap door shall be occupied for living or sleeping purposes.

16/17.6.2.4.3 No room or space that is accessible only by a ladder or folding stairs or through a trap door shall be occupied by clients.

16/17.6.2.4.49 In group day-care homes where spaces on the story above the level of exit discharge are used by clients, that story shall have not less than one means of escape complying with shall be an exit discharging directly to the outside, and the second means of escape shall be permitted to be a window in accordance with 16/2.11.1 one of the following:

(1) A door leading directly to the outside with access to finished ground level.
(2) A door directly to an outside stair going to finished ground level.
(3) An interior stair leading directly outside with access to finished ground level, separated from other stories by a ½ hour fire barrier in accordance with Section 8.3.
(4) (Chapter 17 only) An interior stair leading directly outside with access to finished ground level, separated from other stories by a barrier that has been previously approved for use in a group day-care home.

16/17.6.2.4.54 Where clients occupy a story below the level of exit discharge, that story shall have not less than one means of escape complying with shall be an exit discharging directly to the outside, the vertical travel to the finished ground level shall not exceed 8 ft (2440 mm), and the second means of escape shall be permitted to be a window in accordance with 16/2.11.1 one of the following:

(1) A door leading directly to the outside with access to finished ground level
(2) A door leading directly to an outside stair going to finished ground level
(3) A bulkhead enclosure complying with Section 24.X.X.X
(4) An interior stair leading directly outside with access to finished ground level, separated from other stories by a ½ hour fire barrier in accordance with section 8.3.

(5) (Chapter 17 only) An interior stair leading directly outside with access to finished ground level, separated from other stories by a barrier that has been previously approved for use in a group day-care home.

Substantiation: It appears that it was never the intent of the committee to require true exits in day care homes since the overall philosophy is that these are typically in dwellings. However, in group day-care homes where clients are on upper stories or in the basement, it is the desire to provide at least one protected path although it might not be a true exit. This rewrite uses the provisions from one- and two-family dwellings for the number and type of means of escape. This way the day care provisions do not have to be rewritten each time Chapter 24 is revised. The revisions to 16/17.6.2.4.1 and .2 are clean up to coordinate with Chapter 24. This comment is the result of a meeting between Cathy Stashak and the author of the comment as requested by the SAF-END committee during the ROP meeting. We have gone through several rewrites to assure limited impact on existing (recall the current code requires at least one exit from the second story or basement). This will significantly clarify the Code with minimal (if any) impact on existing.

This is not original material; its reference/source is as follows:

Comes from various parts of NFPA 101.

Committee Meeting Action: Accept in Principle
See Comment 101-175.

Committee Statement: The committee action on the referenced comment made the changes requested by the
Submitter: Ignatius Kapalczynski, CT Office of State Fire Marshal
Comment on Proposal No: 101-252e
Recommendation: Reconsider.
“Single station or multiple station carbon monoxide alarms or detectors shall be provided . . .”
Substantiation: NFPA 720 is now an accepted reference in new Section 9.8.
Committee Meeting Action: Accept in Principle
Add new text as follows:

16.6.3.4.4 Single station or multiple station carbon monoxide alarms or detectors shall be provided in accordance with Section 9.8 in day-care homes where client sleeping occurs and one or both of the following conditions exists:
   (1) Fuel-fired equipment is present
   (2) An enclosed parking structure is attached to the day-care home

Committee Statement: The committee action does what the submitter requested but shows the entire text being added. The committee reviewed NFPA 720, something it was not able to do prior to its action at the ROP stage, and found it to be an acceptable reference (via the reference being added in new Section 9.8 by ROP Proposal 101-205b).
Technical Committee on Educational and Day-Care Occupancies,

Comment on Proposal No: 101-249

Recommendation: Revise 17.2.11.1.2 as follows:

17.2.11.1.2 The requirements of 17.2.11.1.1 shall not apply to any of the following:

1. Buildings protected throughout by an approved automatic sprinkler system in accordance with Section 9.7
2. Where the room or space has a door leading directly to an exit or directly to the outside of the building
3. Where the room has a door, in addition to the door that leads to the exit access corridor as required by 17.2.5.5, and such door leads directly to another corridor located in a compartment separated from the compartment housing the corridor addressed in 17.2.5.5 by smoke partitions in accordance with Section 8.4.
4. Rooms located four or more stories above the finished ground level
5. Where awning-type or hopper-type windows...
6. Where the room or space complies with all of the following:
   a. One door providing direct access to an adjacent room and a second door providing direct access to another adjacent room shall be provided. Doors shall exist that allow travel between adjacent rooms.
   b. The two rooms to which exit access travel is made in accordance with 17.2.11.1.2(6)(a) shall each provide exit access in accordance with 17.2.11.1.2(2) or 17.2.11.1.2(3). Doors used to travel from classroom to classroom shall provide one of the following:
      i. Direct access to exits in both directions
      ii. Direct access to an exit in one direction and to a separate smoke compartment that provides access to another exit in the other direction
   c. The corridor required by 17.2.5.5 and the corridor addressed by 17.2.11.1.2(3), if provided, shall be separated from the rooms by a wall that resists the passage of smoke, and all doors between the rooms and the corridor shall be self-closing or automatic-closing in accordance with 7.2.1.8.
   d. The length of travel to exits along such paths shall not exceed 150 ft (46 m).
   e. Each communicating door shall be marked in accordance with Section 7.10.
   f. No locking device shall be permitted on the communicating doors.

Revise Chapter 16, 16.2.11.1.2 as follows:

16.2.11.1.2 The requirements of 16.2.11.1.1 shall not apply to either of the following:

1. Buildings protected throughout...
2. Where the room or space has a door leading directly to an exit or directly to the outside of the building

Substantiation: The same revisions were made to Chapters 15 and 14 by the action on Comment 101-171. The provisions of Chapters 17 and 16 need to correlate with those of Chapters 15 and 14. The committee action revises the text of 17.2.11.1.2 (2) and existing (5), as well as adding a new item (3) to clarify intent. It is not the committee's intent that any existing arrangement that was judged to be in compliance with the current text be made non-complying by application of the next verbiage. The text changes are for clarification only. A correlative change was made to 16.2.11.1.2(2) for consistency.

Committee Meeting Action: Accept