



September 18, 2012

Ray Allshouse, Chair, State Building Code Council
P.O. Box 41449
Olympia, WA 98504-1449

Reference: Proposed 2012 Amendments to the International Building Code
Section 1008.1.9.6 Special Locking Arrangements in Group I-2

Dear Mr. Allshouse:

De Neff, Deeble, Barton Architects has been providing Architectural Services to the Department of Social and Health Services on projects at the Eastern State Hospital Campus for 10 years. We therefore have an understanding of some of the activities within a Psychiatric Treatment Facility.

We question the desirability or need for the proposed language being added as Section 1008.1.9.6 Special Locking Arrangements, Item 4. This Item reads as follows:

4. A building occupant shall not be required to pass through more than one door equipped with a special egress lock before entering an exit.

We also question the language for the "Exception" for Psychiatric Treatment Areas that does not include Item 4 as part of the exception.

The entire Section 1008.1.9.6 is discussing "Special Locking Arrangements in Group I-2 Occupancies", and applies only to I-2 Occupancies. This Occupancy Group includes Hospitals, Nursing Homes and Psychiatric Facilities. In an emergency, these facilities use a "defend-in-place" strategy in lieu of evacuation of the facility. Evacuation is undesirable, and is used only as a last resort. These facilities already have smoke detectors, fire sprinklers and emergency power, and the buildings are additionally divided by smoke barriers into multiple smoke compartments to provide Refuge Areas.

In a Psychiatric Facility, the doors that separate Patient Wards from other areas are often kept locked. Doors around the building perimeter are also often kept locked. Under provisions of the previous editions of the IBC, as well as NPFA 101 and the Guidelines for Design and Construction of Health Care Facilities, all staff have the common key that operates all of these locks. Currently, the multiple layers of security are incorporated into patient treatment plans which allow some patients to go "off ward" for specific activities and meals, but which do not allow them to leave the building.

The Patient Wards are required by provisions of the Code to have at least two exits - at least one of which must be through a smoke barrier into another smoke compartment. The second smoke compartment is required to provide the area of refuge. A separate exit path must also be provided from the second smoke compartment without having to pass back through the first. The proposed Amendment appears to limit security options for the patients in the name of a perceived increase of life safety, in an occupancy group that already has the highest level of life safety required by the Code.

The technical problem is that "smoke barriers" used to subdivide the building into smoke compartments do not qualify as "fire barriers" and therefore these separate smoke compartments do not meet the definition of an "Exit" as defined in IBC Section 1002. Corridors within these facilities typically do not conform to the IBC requirements for an "Exit Passage Way", and therefore also do not qualify as an "Exit".

Retrofitting existing facilities to meet the additional requirement proposed in Item 4 would be almost impossible. This is particularly true in State owned facilities that are continually facing budget restrictions for Capital Projects. Complying with Item 4 as written would negatively impact security for Patients, Staff, Visitors and the Public.

We respectfully request that consideration be given to modifying the proposed Amendment language. We believe there are several ways that our concerns can be addressed.

1. Item 4 can be stricken, as it does not improve upon life safety.
2. Item 4 can remain, but the Exception would be modified so that Item 4 is included in the list of provisions that are not applied to Psychiatric Treatment Facilities.
3. Item 4 can remain, but is modified to read:
"A building occupant shall not be required to pass through more than one door equipped with a special egress lock before entering an exit or passing into another Smoke Compartment constructed in accordance with Section 407.4."

We appreciated the opportunity to present our concerns before the Council at the Public Hearing held September 14, 2012 in Spokane Valley. If there are any further questions, please contact us.

Sincerely,

DE NEFF, DEEBLE, BARTON ASSOCIATES
ARCHITECTS AND PLANNERS



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