



AOBA COMMENTS

Section 906 Portable Fire Extinguishers

Amend the section as follows:

Delete the exception in 906.1.1 in its entirety and substitute the following in its place:

Exceptions:

- 1. In new and existing Group A, B, E and R occupancies equipped throughout with quick response sprinklers, portable fire extinguishers shall be required only in locations specified in Items 2 through 6.**

- 2. In Group R-2 occupancies which are not equipped throughout with quick response sprinklers, portable fire extinguishers shall be required only in locations specified in Items 2 through 6 where each *dwelling unit* is provided with a portable fire extinguisher having a minimum rating of 1-A:10-B:C.**

Justification:

Exception 1, as recommended to be amended, does two things:

- 1. It maintains the exception, which has been in the District's code for many years, for Assembly, Business and Education occupancies which are fully sprinklered.**

This exception had been in the Model Code and adopted by D.C. for many years. It was intended to be an incentive for building owners to install sprinklers. The 2012 Model IFC dropped it, but no fire incidence data has been provided, here or elsewhere, to support the need for doing so. Rather, it has been about selling equipment. The Fire Equipment Manufacturers Association was successful in pushing through these code changes in the name of “redundancy.” Third, the extension of the requirement to existing buildings will be hugely costly. As written, the 2012 IFC provision would require retrofitting of cabinets and extinguishers in hundreds of buildings, incurring millions of dollars of costs for property owners and their tenants.

2. It would add R occupancies to the exception when they are fully sprinklered.

Including R occupancies which are fully sprinklered was recommended by the full Building Code Advisory Committee and its Fire and Life Safety Subcommittee in the 2006 code cycle. They did so for the same reasons that warranted exceptions for A, B and E occupancies. Sprinklering provides a highly effective degree of fire safety which makes portable fire extinguishers not only redundant, but dangerous. There is no life safety justification for portable fire extinguishers in a fully sprinklered building. The only reason to encourage occupants to “stand and fight” in a sprinklered building is to protect property.

Unchanged, this provision adds millions of dollars in costs to D.C. residents and businesses, and puts building occupants at risk of physical harm or loss of life.

Finally, it should be noted that none of the surrounding jurisdictions maintains such a redundant requirement for these occupancies if they are sprinklered. Virginia’s code specifically maintains exceptions from PFE requirements for them. Montgomery and Prince George’s Counties utilize 2012 NFPA 101, which does not require PFEs in A, B or E occupancies and only requires PFEs in nonsprinklered apartment buildings.

Exception 2, as recommended above, is the same as the exception provided for in the 2012 Model IFC, but modified to make it an available option for unsprinklered buildings. For unsprinklered R-2 buildings, it will be a welcome option for building owners to consider utilizing.