

TECHNICAL AND CODE INTERPRETATION QUESTIONS:

- Q. For evaluation and scoring purposes, the Rules distinguish between Residential and Commercial occupancies. In terms of the referenced sections of the Chicago Building Code (CBC), the occupancies discussed are Residential and Business occupancies. Is the Commercial category intended to be inclusive of other occupancies beyond Business occupancies? If so, which additional occupancy categories, and on what basis are they to be a) reviewed and b) scored?**
- A. When we used the “commercial” designation for occupancy, we were trying to broadly encompass occupancies that were not “non-transient residential” Class A-2. Section 13-196-205 states that all buildings over 80 feet in height must be sprinkled – regardless of occupancy – subject to the exceptions listed. So, if a building is over 80 feet in height and is Class E Business or Class F Mercantile, they generally must be sprinkled unless they are historic. For the purposes of the LSE, all occupancies other than A-2 are scored using the broad “commercial” classification.
- Q. Do non-residential occupancy areas of a building only need to meet the applicable requirements of the given use (ex. mechanical room levels do not need to meet residential travel distance requirements)?**
- A. This is correct provided that the mechanical levels of the building are used exclusively for that use. If the occupancy is shared, then the most restrictive occupancy requirements would govern.
- Q. Are grocery and dry cleaners, not otherwise managed by the building management company, considered mixed use even if they fall within the 5% accessory use area limitation?**
- A. Per 13-56-250, these uses cannot be considered auxiliary use to the building since they are not controlled and managed by the building. For Rule 10.18, I would score this parameter as “0” since this is a mixed use and not an auxiliary use nor apparently do any of the auxiliary uses violate 13-56-250. With respect to the mixed use rating in Rule 10.16, the adequacy of separation would control the rating.
- Q. Do residential and historical buildings that are going to be protected with sprinklers need to conduct an LSE?**
- A. We have consistently stated that just because a building elects to install sprinklers, this does not exempt them from performing a LSE. The only exception is for the commercial, non-historic, buildings which must install sprinklers by ordinance.

- Q. Is it the intent that, when residential floors are subdivided to meet compartmentation requirements of Section 10.3, but the auxiliary use floors are not subdivided (such as a parking garage level or swimming pool level), the entire building is penalized for not having compartmentation? In post-1975 buildings, some of the residential buildings have parking levels or a lobby level that are fully sprinklered, and would not be required under the current high rise provisions to be subdivided. The LSE seems to contradict the intent of the Chicago Building Code as it exists today.**
- A. Section 13-76-020(a) requires no compartmentalization when the floor is fully sprinklered provided that smoke control and compartmentation of the remaining compartmented portions of the building are maintained. In this case, the sprinklered floor would be scored an "8" if it meets this requirement since there is no compartmentation requirement. You would separately evaluate the non-sprinklered residential floors to determine the appropriate score based on allowed compartmentation. The building would be scored for the lower of the two values.
- Q. In evaluating corridor construction, is it acceptable to grade a corridor as "less than 1 hour" (with a score of -2) where the door to an electric meter closet on a floor has a louver for ventilation with no fire damper? It is common that in new construction, the corridor rating of 1-hour extend around the back of meter closets on floors. Under this approach, the corridor partitions in the LSE could be graded as "1-hour or more" with a score of 0.**
- A. If the separation extends behind the closet and there is proper fire stopping within the closet, then the one hour or more requirement has been met even though the door has louvers. Thus, the score would be "0" in this case.
- Q. In those buildings that have parking levels, that may not be separated between parking floor levels, but are properly separated from the residential levels, do we need to assess protection of vertical openings as outlined in Section 10.6 as having interconnected levels where separation of those levels was not otherwise required by the CBC?**
- A. You would ignore the vertical openings in the garage level.
- Q. In evaluating communications systems per Section 10.9, and understanding that all buildings must be retrofitted with code complying 1-way and 2-way voice alarm systems, does the public address system receiving 5 points have to communicate to more**

than one unit at a time? Does it have to communicate to a whole floor or multiple floors?

- A. In order to receive the scoring of “5”, the existing PA system must at least meet the requirements of 13-196-210 prior to the enactment of the Life Safety Ordinance changes.
- Q. Many buildings will have smokeproof towers where the heat activated devices (HAD) may not function properly and parts will be difficult, if not impossible to find. In grading the LSE, Section 10.10 only gives the building an additional 1 point for a functioning smokeproof tower. However, Section 34(13-196-208) now requires that the HADs in the smokeproof tower be tested on an annual basis. What time frame will the buildings need to meet if they should need to changeout the obsolete HADs?**
- A. The performance of a LSE does not exempt a building from complying with the requirements of the CBC. The fact that the building is not complying with the requirements of the CBC should be immediately noted to this office so that this issue can be dealt with through compliance. Since there is a smokeproof tower, it should be scored as if it is functioning properly since it can be brought in to compliance. Since there is no “phase in” for compliance, we would expect the heat activated devices to be addressed in a timely manner.
- Q. For evaluation of Sections 10.12.and 10.13, can the dead-ends or travel distances on non-residential floors be scored based on the requirements associated with that occupancy? More likely than not, the mechanical or parking levels will have travel distances or dead-ends that exceed those found on the residential floors, which should not penalize the residential scoring.**
- A. The non-residential floors should be scored separately and the lower of the two scores used for the overall building score for this parameter.
- Q. In evaluating the emergency lighting per Section 10.15, if the building management does not maintain records of properly testing the units (i.e. the annual 90-minute drain test), is it intended under the LSE that this condition be evaluated as not having the system, therefore scoring a -10?**
- A. The performance of a LSE does not exempt a building from complying with the requirements of the CBC. The fact that the building is not complying with the requirements of the CBC should be immediately noted to this office so that this issue can be dealt with through compliance.

Since there is emergency lighting, it should be scored as if it is functioning properly since it can be easily brought in to compliance.

Q. Are the first (not yet “approved”) drafts of the reports required to be submitted to the City by September 1, 2005? There is no “requirement” per se.

A. We have only said that we would prefer receiving the reports by September 1st to allow for a review. We will not penalize a building that submits a report on December 31st provided that the report passes upon review.

Q. New CBC Section 34(13-196-207), Materials and Installation Standards for Retrofit Fire Protection Systems, includes a number of relaxed requirements for retrofit or newly installed systems. Can those provisions be applied to replacement of or additions to previously required systems?

A. Yes, these provisions can be applied to replacement and additions to systems. Additionally, you should note that the use of CPVC pipe was extended to all sprinkler systems.

Q. Section 10.4.2: Commercial Tenant separations: Section 15-8-240 of the CBC requires that on floors occupied by more than one tenant, separations be provided to create separate areas of less than 10,000 square feet. This code section does not appear to require that each tenant be separated from all other tenants.

A. Section 15-8-240(a)(2) states that “In Business, Mercantile, Moderate Hazard Industrial or Moderate Hazard Storage Units any area occupied by more than one business owner, ... shall be divided by partitions providing a fire rating of not less than two (2) hours into areas not exceeding: All other buildings – 10,000 sf.”

Q. As a follow-up to the previous question, if the leased floor area is less than 10, 000 s.f. per floor, are any separations required? If not, how should this item be scored? Does it make any difference what level of fire separation is provided by the corridor walls?

A. If the floor area is less than 10,000 sf, 15-8-240(a)(2) still applies and separations are required if the space is used by two or more tenants. If the only separation between tenants occurs due to the corridors, then this is the separation that drives the score. Otherwise, it is the walls that separate each tenant.

- Q. Continuing with the same line of previous question, if the gross floor area is less than 10, 000 s.f. per floor, are any separations required? If not, how should this item be scored?**
- A. Per 15-8-240(a)(2), separations are always required when there are two or more tenants on a floor. Thus, if you have two tenants on a floor that is less than 10,000 sf in area and have no rated partitions between the tenant spaces, the scoring would be –5 if there are incomplete partitions and –2 if the partitions are rated less than one (1) hour.
- Q. Section 10.5: Corridor Partitions: What labeled fire rating is assumed to be equivalent to that of a “solid slab door”?**
- A. We will accept testing from any recognized agency to determine the fire rating for any non-labeled door that the Professional of Record believes will pass a fire rating test. This obviously means that you will have to sacrifice a single door for the test, but it will save the cost of replacing all doors with labeled doors. Your LSE should include the documentation for the test and you should direct the building owner to devise a means of affixing a test label to the doors.
- Q. Section 10.11: Means of Egress Capacity and Number: Nothing in the scoring reflects any shortcomings in capacity. Why?**
- A. The overriding assumption is that the building complies with the CBC. The fact that the building does not meet the minimum scoring for a given parameter does not mean that the building does not have to comply with the CBC. If there is insufficient exiting, this must be addressed.
- Q. If there are mixed occupancies, is it correct to assume that the capacity of stairs should be evaluated for each occupancy served? What if residential and business occupancies have 50% excess occupancy, but other occupancies do not?**
- A. Parameters are evaluated for the most restrictive use. Thus, if you have a mixed occupancy residential building, then the residential scoring for parameters is used. In your example, if the residential and business occupancies exceed exit capacity by as much as 50%, you will have to find a means to address this deficit. If you have building with this problem, I think that we should look at the situation to determine why this is occurring.
- Q. Section 10.5: Corridor Partitions: What are the requirements and the scoring parameters for assembly spaces, if they must be included in the scoring? How do I score corridors for floors with mixed business and assembly occupancy?**

A. You always use the most restrictive criteria for determining scoring. Thus, you would use the requirements for assembly occupancy to determine the required number of exits, compartment and partition ratings.

Q. Section 10.10: Smoke Control: Are operable windows also required in each building occupancy unit? How are assembly units (consisting of small and large assembly, office, and classroom spaces) to be scored?

A. If you want to receive the scoring for operable windows, then all windows must be operable. If there is some small space with a window that is not operable, we would consider ignoring that anomaly but generally all windows must be operable.