



AUSTIN FIRE DEPARTMENT

4201 ED BLUESTEIN RD. AUSTIN, TX 78721 P: 512.974.0130 F: 512.974.0141

Question/Comment
When will the required Affordability Impact Statement be available to the public?
Response
The request for an AIS has been submitted to the Housing and Planning Department.

Question/Comment
To help assure the system functions properly in tall buildings under extreme conditions of wind and stack effect, please consider adding to the amended section 909.20.3.2 Pressure difference, the requirement: when pressurized entrance vestibules are present the pressure difference across the closed door from stair to vestibule shall be balanced to within 10% of the pressure difference across the closed door from vestibule to building.
Response
Verbiage has been added to this section for balancing the two doors within 10%. There is also verbiage added indicating the minimum pressure across the two doors shall not be less than 0.10" in w.g.

Question/Comment
What is the need for amendment to 903.2.4.2? If storage is over the MAQ, wouldn't it result in a Group H occupancy classification, which would automatically mandate a sprinkler system?
Response
<p>The short answer is that an H occupancy is no longer required by the IBC when the MAQ is exceeded in the storage of distilled spirits and wines. These will be classified as F-1's or S-1's, never an H.</p> <p>The purpose of this amendment is to require automatic sprinkler protection only when the Alcohol By Volume (ABV) content of ethanol in a distilled spirit is more than 20% by volume of ethyl alcohol. An automatic sprinkler system will be required when the Group F-1 distillery is storing > 120 gallons of alcoholic beverage that contains more than 20% alcohol by volume. If the distillery maintains quantities of > 20% ethanol below the 120 gallon Maximum Allowable Quantity value specified in 2021 International Building Code Table 307.1 (1), an automatic sprinkler system isn't required. Note that if a distiller wants to divide building or tenant space into separate controls area, an additional 120 gallons of > 20% ethanol could be stored in each area. Under the IBC, four control areas are allowed. This means one can store 480 gallons of > 20% ethanol in a building without an automatic sprinkler system.</p> <p>If the ABV is < 20% by volume, an automatic sprinkler system is not required, regardless of quantity.</p>



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Question/Comment

I would just like to confirm that since section 909.20 Smokeproof enclosures was deleted in the CoA Amendments, there is no requirement for the equipment, control wiring, power wiring and duct work to be located within a 2-hour fire barrier.

Response

This provision was inadvertently deleted with this proposed amendment. This requirement is being placed as section 909.20.3.4 in the proposed draft amendments. Thank you for bringing this to our attention.

Question/Comment

Amended section 909.20.3.1 seems a little confusing when referencing the requirements of when computer modeling software is utilized. The 'are' in front of mixed-use occupancies could be interpreted to carry a different intent.

Response

This section has been revised to reference any one of the conditions listed for modeling software requirements.

Question/Comment

Reading section 605.4.2.2, it appears that a high rise may be allowed to have up to 3,000 gallons of diesel fuel. Is this correct?

Response

This is correct. There can be up to 3000 gallons and not be an H occupancy but there will be requirements for 1 hr room construction with containment and automatic sprinklers. It is also restricted to 6 stories above the lowest level of fire department access which is consistent with H occupancy limits. Previously an H occupancy was required excluding ventilation so this is consistent with the previous requirements. Historical modeling has shown that the risk with the above requirements is minimal and the quantity of fuel can be increased safely.

Question/Comment

I assume with the deletion of 510.1 exception 1, ERRC would be required regardless in existing facilities. The portion of 1103.2.1 that allows existing wired systems to remain would be overridden with 510.1 exception 1 not approved (deleted). This may be a little confusing for some building owners hoping for their existing hardwired system to be an ongoing option.

The concern would be with the 1103.2.2 time frame. Without a published time frame, existing building owners will always be asking and questioning what that is. How will AFD establish a timeframe for existing buildings owners to install an ERRC system? Will it be listed on an inspection report, a formal letter issued by the CoA?

Response



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The intent is for section 510.1 is to be applied to new buildings. In buildings undergoing a renovation with a two-way system, then section 1103.2 would be applicable. The overall intent is that if there is an existing two-way system in a building, it will be allowed to remain under section 1103.2 and/or the provision of section 510.1 exception 2. This, and the timeline will be more thoroughly clarified in the Fire Criteria Manual update.