
I-3 WORK GROUP

Meeting Minutes – September 15, 2026

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Contacts:

Chair – Jena Garcia, Deputy State Fire Marshal III (Supv), (916) 531-7650, jena.garcia@fire.ca.gov

Co-Chair – Scott Woody, Supervising Architect, (916) 594-4627, scott.woody@fire.ca.gov

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I. CALL TO ORDER – 1:02 PM PDT

A. Welcome/Introductions – Jena Garcia (OSFM-CDA) and Scott Woody (OSFM-FLS)

1. The meeting was called to order by Jena Garcia and all participants were welcomed and informed that the meeting was being recorded and transcribed to assist with meeting notes.
2. Introductions were conducted around the group from state agencies and government representatives and private sector.
3. Deputy Executive Director Kevin Day (CBSC) took a moment to announce that the California Building Standards Commission was actively seeking applications to fill vacant fire official positions on several of its six Code Advisory Committees for the upcoming 2027 Triennial Code Adoption Cycle. He encouraged attendees to spread the word to any qualified local fire officials interested in participating, directing inquiries to the [CBSC general inbox](#).
4. Assistant State Fire Marshal Vickie Sakamoto welcomed the group, noting that the I-3 Work Group had been long overdue for reconvening. She expressed appreciation for the breadth of stakeholder participation from both the private sector and state agencies and stated she was looking forward to new proposals for regulatory changes.

B. [Agenda](#) / Minutes Review

1. Scott Woody provided a brief overview of the [Code Development and Analysis](#) website, directing attendees to the [Code Development Work Groups](#) page where all agendas, meeting minutes, and related materials are posted. He emphasized the importance of [subscribing](#) to the OSFM Committee and Work Group Updates mailing list, as well as the Title 24 Rulemaking Updates list, to receive automatic notifications.

II. OLD BUSINESS

- ### A.
- No prior meeting minutes were available, as this was the inaugural meeting of the reconvened I-3 Work Group.

III. NEW BUSINESS

A. [Charter](#) Review and Approval

1. Scott Woody presented the draft Work Group Charter, which is publicly posted on the CDA website. The charter outlines the group's purpose, goals, and operating procedures as follows:
 - i. Goals and Objectives: The primary goals are to promote statewide consistency and clarity in California amendments pertaining to I-3 occupancy regulations, and to provide continuing clarity to CBC Chapter 4, Section 408. The group's objectives include evaluation of current model code language and California-specific amendments.
 - ii. Scope and Authority: The Work Group's recommendations are advisory and must be routed through OSFM executive leadership for approval by State Fire Marshal Daniel Berlant before any proposals are submitted to the California Building Standards Commission. It was clarified that while individual private practitioners may independently submit proposals to the ICC, any model code proposals made on behalf of the State Fire Marshal require executive approval. The group's primary focus remains on California amendments and the triennial cycle.
 - iii. Meeting Operations: Meetings are to be held virtually via Microsoft Teams. A simple majority is sufficient to pass a motion. The group operates in compliance with the Bagley-Keene Open Meeting Act, which requires published notices, open agendas, and public access. Chair responsibilities rest with OSFM Code Development and Analysis (CDA), and co-chair responsibilities rest with OSFM Fire and Life Safety (FLS).
 - iv. Transparency: Meeting minutes and agendas will be published on the CDA web page. CDA staff will provide administrative support, including preparation of meeting minutes.
2. Jena Garcia advised that CDA would circulate a poll to the work group in the coming weeks to gather consensus on charter approval, rather than voting at this first meeting. She requested that any suggested edits or comments be emailed directly to the chair and co-chair ahead of the next agenda.

B. Timelines

1. [Triennial Code Cycle](#) – Work Group proposals due 11/30/2026
 - i. Jena Garcia presented the timeline governing the 2027 Triennial Code Adoption Cycle. The California Building Standards Commission has a firm submission deadline in May for Building, Fire & Other (BFO) documents. To accommodate internal review, economic analysis, and executive approval within OSFM, CDA has established an internal hard-stop deadline of February 1, 2027. This means all work group proposals must receive final work group approval no later than the last meeting in January 2027.
 - ii. Scott Woody and Jena Garcia urged the group to have draft proposals ready for comment by November and December, so they can be finalized in January. Both acknowledged the compressed timeline and the added complication that the published 2027 model code is not yet available, with an anticipated mid-October release from ICC.
 - iii. In the context of the tight timeline, Scott Woody encouraged participants to begin identifying proposal topics immediately. He suggested that

subgroups could be formed around specific issues, similar to the approach taken during the previous I-3 Work Group cycle. Proposals, even in preliminary form, should be submitted to Scott Woody, Jena Garcia, and Adrienne Janowiak as soon as possible so they may be placed on a future agenda. Jena Garcia noted that the group should be hyper focused on items that are clearly misaligned or in need of cleanup, given the limited time available to build consensus before the February 2027 internal deadline.

2. ICC Model Code (IBC/IFC 2030 Proposals) – Work Group proposals/suggestions due 1/12/2027. State Fire Marshal review and approval prior to SFM submission to CBSC
 - i. Scott Woody presented an active ICC proposal, G 69-25, which originated from a State Fire Marshal submission and underwent two rounds of modification before the current code action cycle concluded. The proposal addresses smoke control requirements in I-3 occupancies and is directly relevant to potential California amendments.
 - ii. The original proposal sought to strike existing "windowless buildings" language in Section 408.9 and introduce the concept of a "tenable environment" tied to conditions 3, 4, and 5. After the first committee action, it was modified to require a smoke control system in accordance with Section 909 for sleeping areas in conditions 3, 4, and 5, earning a 12-1 vote. A subsequent modification further refined the language to read that "sleeping areas and any spaces the sleeping area are open to, such as day rooms, group activity spaces, and other common spaces, shall be accounted for in the design of the smoke control system," earning a 9-0 vote. The committee noted, however, that the language "could still be improved."
 - iii. Scott Woody cautioned the group that this proposal has not yet been formally published as part of the 2027 IBC, and its final disposition depends on upcoming membership voting. He advised attendees to track the proposal using the reference number G 69-25 on the ICC website.
 - iv. Several members engaged in discussion regarding the substance of the proposal:
 - a. Lorenzo Lopez (Nacht & Lewis) raised a longstanding concern that Section 408.9 had referenced "tenable environment" without providing a definition, creating enforcement ambiguity. He also noted that the existing formulas under Section 909 appeared to penalize facilities with larger day room volumes—the opposite of the intended effect—and suggested that a corrected formula should be developed by someone with expertise in smoke dynamics. He further observed that the code does not adequately account for current security electronics, specifically the ability to remotely release all doors simultaneously, which should factor into egress design.
 - b. Maynard Feist (Lionakis) and Alvin Wong (OSFM-FLS) both recalled that the 50% openness threshold adopted in the prior cycle for vehicle safety ports was informed in part by concepts from NFPA standards, though no formal engineering model was cited.

Lisa Beaver (Bureau Veritas) asked for clarification on the origin of the 50% figure, noting its relevance to demonstrating equivalency during plan review. It was confirmed that the rationale was analogous to outdoor recreation yards, which the code also requires to be at least 50% open to avoid being classified as enclosed rooms.

- c. Alvin Wong (OSFM-FLS) noted that the prior change proposal documents may contain more detailed justification and could be retrieved for reference.
 - d. Regarding California-specific amendments, Scott Woody noted that if G 69-25 is adopted into the 2027 IBC, California would need to amend the model code language to add Condition 9, which exists only in California, and to revisit whether any existing state-specific exceptions remain necessary.
- C. Review previous I-3 Work Group status and current changes to 2025 CBC Section 408
 - 1. Scott Woody provided a review of the three code changes produced by the prior I-3 Work Group, all of which were incorporated into the 2025 CBC:
 - i. Windowless Buildings / Housing Pod Definition (Section 408.9): California added Condition 9 alongside existing conditions to reflect the state's mental health housing classification. The language was also updated to include the California-specific definition of "housing pod." Several confusing exceptions were eliminated, leaving only two. The intent was to clarify that smoke control requirements apply specifically to where incarcerated individuals sleep, not to all areas of a facility.
 - ii. Glass and Glazing Standards: This was a straightforward update led by Maynard Feist (Lionakis) and Chuan Ha (Lionakis), updating the referenced ASTM standard for detention glass to the most current version.
 - iii. Vehicle Sally Ports: Led by Lorenzo Lopez (Nacht & Lewis) with support from Alvin Wong (OSFM-FLS), this change clarified the fire barrier requirements for vehicle sally ports. The amendment established that a 2-hour fire barrier is required for enclosed sally ports, but if the roof is at least 50% open to the elements—such as through a chain-link or louvered roof—no fire barrier separation is required. Additionally, solid-roofed sally ports must be fully sprinklered as part of the overall building system.
 - 2. Scott Woody noted that "significant changes" commentary published by ICC had characterized this amendment somewhat inconsistently with the group's original intent, but emphasized that the commentary is not the code itself.
- D. Review/Discuss current 2027 Intervening Code Changes to Section 408 and/or effects I-3 Occupancy
 - 1. The group engaged in a broader discussion about the overall direction and scope of Section 408 for the upcoming cycle.
 - 2. Scott Woody challenged the group to consider whether California's intervening spaces requirements—which have no counterpart in the other 49 states using the IBC—are still necessary, given California's mandatory use of noncombustible construction, full sprinkler coverage, and fire alarm systems in I-3 occupancies.

He suggested these requirements may be a legacy of the transition from the Uniform Building Code (UBC) and that starting from the 2027 model code base and amending forward could be a more rational approach. However, he acknowledged that such a comprehensive overhaul is unlikely within the current compressed timeline.

3. Maynard Feist (Lionakis) provided historical context, explaining that the intervening spaces concept and the accompanying interpretive guidance manual were originally developed because of extremely varied interpretations of the IBC—including interpretations that sleeping cells opening onto a day room required a rated corridor assembly. The graphics-supported guidance document was intended to resolve these disputes. He and Lorenzo Lopez (Nacht & Lewis) both acknowledged that while the guidance document is now two code cycles old and outdated, it historically served a critical function.
4. Jena Garcia asked whether the guidance document could be integrated into the electronic code as an "insight" notation beneath the amended section. Scott Woody indicated this was not feasible in the near term because the document has not been updated to reflect current code.
5. Deepika Padam (Judicial Council of California) asked what the game plan was as a collective work group and whether proposals should address ICC model code first before addressing the CBC. Scott Woody confirmed that CBC changes can be proposed independently of ICC submissions, and that the group's primary focus is on California amendments. He advised JCC and others to begin with the 2025 CBC as the working baseline, identify cleanup items, and prioritize low-hanging fruit to demonstrate measurable progress within the current timeline.
6. Deepika Padam (Judicial Council of California) also asked whether the work group's scope could extend beyond Section 408 to other fire and life safety items. Jena Garcia clarified that OSFM-CDA currently has multiple work groups active this cycle—including a Child Care Center Work Group and a Fire Alarm Work Group—and that capacity constraints limit the addition of new groups for this cycle. She directed any party with general code concerns or identified errors to email CDA directly, noting that such items are analyzed in-house and may be referred to Fire Life Safety for review.
7. Richard Traversi (CDCR) raised a conflict between the Mechanical Code and I-3 occupancy provisions related to high-probability refrigerants, specifically that narrative language in the code appeared to permit their use in I-3, while the accompanying table excluded I-3. He noted that CDCR had already submitted a code determination and was directed to submit a change proposal. Jena Garcia and Scott Woody confirmed this item should be forwarded to the three contacts (Jena Garcia, Scott Woody, and Adrienne Janowiak) immediately, given that mechanical code proposals were on a different, earlier deadline.

IV. ROUNDTABLE/PUBLIC COMMENT

- A. No additional public comments were raised beyond the discussions that had already occurred organically during the New Business portion of the meeting.

V. UPCOMING MEETING DATES FOR 2026

- A. Meetings are held every two weeks on Tuesday from 2:00 PM to 3:30 PM PDT.
- B. Upcoming meetings:
 - 1. September 29, 2026
 - 2. October 13, 2026
 - 3. October 27, 2026
 - 4. November 10, 2026
 - 5. November 24, 2026 (week of Thanksgiving)
- C. Jena Garcia confirmed that meetings would be held every two weeks on Tuesdays, for a duration of 1.5 hours (2:00 PM to 3:30 PM). CDA will send out a scheduling poll to confirm the recurring time slot.
- D. Troy Pennington (Judicial Council of California) reported difficulty subscribing to the OSFM notification system, as the subscribe button did not redirect to a confirmation page. Jena Garcia advised those experiencing technical issues to share their contact information in the chat or email CDA directly to be manually added to the notification list.
- E. Anthony Pamintuan asked whether proposals needed to be submitted before September 29th to be included on the next agenda. Scott Woody encouraged submissions as soon as possible, noting that even preliminary topic descriptions are sufficient at this stage, and that any item introduced informally would be added to a subsequent agenda.
- F. Jena Garcia flagged that the November 24th meeting falls during the Thanksgiving holiday week and that attendance may be limited.

VI. MEETING ADJOURNMENT – 2:34 PM PDT

- A. Jena Garcia thanked all attendees for their time and participation and the meeting was adjourned.

*Please [subscribe](#) to the “OSFM Committee and Workgroup Updates” mailing list to receive updates

If you would like to watch the recording of this meeting, please visit the link below:

<https://youtu.be/eF4vmrQUcMc>

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