
I-3 WORK GROUP

Meeting Minutes – September 29, 2026

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Contacts:

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I. CALL TO ORDER – 2:04 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 reminded that the meeting is open to the public, attendance is tracked, participation is consensus-based rather than by formal vote, and 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.

B. [Agenda](#) / Minutes Review

1. The [September 15, 2026 minutes](#) were noted as posted on the [CDA Work Group website](#). No objections were raised, and the minutes were accepted by consensus.

II. OLD BUSINESS

A. [Charter](#)

1. The draft charter, previously posted and discussed at the last meeting, was presented for final feedback. No objections or suggested revisions were raised, and Jena Garcia announced that the charter would be routed for approval.

III. NEW BUSINESS

A. The floor was opened for stakeholders to identify code sections in need of revision. Three proposals were submitted ahead of the meeting by JCC, CDCR, and OSFM-FLS. Additional topics emerged during discussion. All proposals are intended to be developed through subgroups that meet on off-weeks and report back to the main work group. Stakeholders interested in participating in a subgroup were asked to contact the respective lead directly, copying OSFM support staff. Final proposals will be submitted in strike-and-underline format with a written justification.

B. Ideas for proposals for changing items/sections

1. JCC Recommendations for I-3 CA Amendments-Tony Pamintuan
 - i. JCC identified inconsistencies in code requirements for fire-rated corridors in I-3 custody areas, specifically between CBC Sections 408.10.2.5, 408.10.2.2, and 1020.2(7). Different design teams have reached different interpretations regarding when a rated corridor is required, particularly around the occupant load thresholds of 20 (temporary holding) and 100 (intervening spaces). JCC's

recommendation is to establish consistency between these sections, potentially allowing elimination of the rated corridor requirement for type I construction with fewer than 100 occupants, while still treating those spaces as intervening spaces. [Tony Pamintuan](#) and [Deepika Padam](#) (JCC) were identified as subgroup leads for this topic.

C. Ideas for proposals for changing items/sections

1. CDCR Recommendations for I-3 CA Amendments-Richard Traversi

i. Small Management Yard

- a. CDCR proposed updating the California definition of "small management yard" to replace the existing maximum area limit with an "unencumbered area" (or equivalent defined term such as "net free floor area") to accommodate expanded program use, including mental health populations requiring furnishings such as tables, stools, and pull-up bars. This was characterized as low-hanging fruit requiring minimal stakeholder debate. [Richard Traversi](#) (CDCR) will lead this subgroup.

ii. High Probability Refrigerant

- a. CDCR contended that the current UMC table listing "none" for I-3 occupancies may be an oversight, and that I-3 should be treated similarly to I-2, permitting Group A1 and A2L refrigerants under superscript conditions. OSFM noted that because this is model code (UMC) language, any change would need to go through the IAPMO process, and that the 2027 edition still reflects "none" for I-3. The item was noted for awareness but deferred to the model code process.

iii. Construction

- a. CDCR raised the long-standing issue of California's requirement for Type I construction in I-3 occupancies as a legacy of the UBC, and suggested that, given advances in sprinkler technology and IBC adoption in other states, California should reconsider allowing other construction types. The group broadly agreed this is an important topic but not low-hanging fruit for the current cycle. It was tabled for post-January discussion, with JCC expressing interest in participating.

D. Ideas for proposals for changing items/sections

1. OSFM-FLS Recommendations for I-3 CA Amendments-Laura Wood/Alvin Wong

i. Security Glazing

- a. Alvin Wong presented a comparison of two code sections addressing glazing in I-3 facilities: Section 408.7 (model code, security glazing) and Section 408.13 (California amendment, windows). These sections create interpretive confusion on projects, and OSFM's proposal is to consider removing Section 408.13 and relying solely on the model code language of 408.7. Discussion highlighted several key tensions: the 9 sq. ft. maximum glazing area in 408.7 may be insufficient for corridor observation windows; sprinkler coverage requirements (including window sprinklers) are difficult to meet under BSCC-approved equipment; and detention door glass panels are often larger than 408.7

permits. Maynard Feist (Lionakis) noted the historical rationale for the California language was to enable security glazing in rated corridors for observation purposes and cautioned against oversimplifying the issue. [Alvin Wong](#) and [Laura Wood](#) (OSFM-FLS) will co-lead a subgroup on this topic. Tonya Parker-Mashburn and Rafael Gomez (BSCC) confirmed participation. Erel Betser (GHD) agreed to gather information on how 408.7 is implemented in other states.

- i. Additional Discussion — Cell Complex Definition: Alvin Wong raised that the definition of "cell complex" in the CBC is self-referential (the term appears within its own definition), creating interpretive confusion across agencies. The group acknowledged this as a potential low-hanging fruit cleanup item, with Scott Woody noting the ambiguity extends to whether housing pods are considered cell complexes.
- ii. Additional Discussion — Behavioral Health / I-2 vs. I-3 Classification: Maynard Feist (Lionakis) raised the emerging challenge posed by behavioral health (BHCIP) facilities that operate as locked mental health units but are not licensed by HCAI, creating uncertainty about whether I-2 or I-3 occupancy classification applies. The group acknowledged this involves multiple licensing agencies (CDPH, HCAI, DSH) and is likely too complex to resolve in the current cycle. It was suggested that a separate work group may be warranted.

IV. ROUNDTABLE/PUBLIC COMMENT

- A. No additional public comments were raised beyond the discussions that had already occurred 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. October 13, 2026
 2. October 27, 2026
 3. November 10, 2026
 4. November 24, 2026 (week of Thanksgiving)

VI. MEETING ADJOURNMENT – 3:25 PM PDT

- A. There being no further business, the meeting was adjourned.

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<https://youtu.be/Ki4skSfWhXA>

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