

**OAA's response to the *February 11, 2022 Discussion Paper – Interim Changes to the 2012 Building Code to support innovation, increase housing supply and improve firefighter safety***

April 14, 2022

Hi James,

In the discussion paper of February 11, the Ministry of Municipal Affairs and Housing seeks input on the following three proposed amendments to the Building Code (Ontario Regulation 332/12):

- Phased occupancy of super-tall buildings;
- Factory-built, modular construction of multi-unit residential and other buildings; and
- Notification program for truss and lightweight construction.

We understand the proposed amendments for phased occupancy of super-tall buildings and modular construction have been incorporated into the *More Homes for Everyone* initiative. As this initiative, and its associated legislation, remains before parliament, we have moved forward with provided feedback on those proposals in line with the Ontario Regulatory Registry posting.

On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). As this proposal has already been incorporated, we have therefore omitted notes for this topic.

Please do not hesitate to contact us if you wish to discuss our submission further.

Sincerely,



Susan Speigel, Architect  
OAA, FRAIC  
President

## **Partial or Phased Occupancy of Super-tall Buildings**

As condominium buildings and other skyscrapers are becoming taller, construction is taking longer, meaning that the occupancy of “super-tall” buildings may take as many as five to six years. These delays regarding occupancy are increasing costs and, in the case of condos, it contributes to reduced affordability.

This proposed Building Code amendment would be intended to establish new prescriptive requirements specific to the partial or phased occupancy of “super-tall” buildings. The Ministry is exploring opportunities to allow safe occupancy of lower floors before the building’s structure and enclosing walls are completed. This could help reduce delays for businesses to open their doors and people to move into housing.

The existing provisions in the Building Code address early occupancy when the entire building’s structure and enclosing walls are completed to the roof. The existing provisions in the Building Code reflect typical high-rise building construction practices. There may be ways to amend the current provisions to address challenges related to partial occupancy of super-tall buildings while continuing to protect safety. Should the Building Code be amended to permit earlier phased or partial occupancy for super-tall buildings, the change would support new and more modern building design and reflect current approaches.

This Discussion Paper outlines and is seeking input on whether prescriptive requirements to allow earlier partial occupancy for super tall buildings should be developed for inclusion in the Building Code and what those requirements should be.

## **Background – Partial or Phased Occupancy of Super-tall Buildings**

Occupancy requirements in the Code are intended to protect the health and safety of the building occupants and the members of the public that will be allowed into or near the partially completed building, including onsite construction trades and first responders. In addition, the requirements help ensure the safe and orderly occupation of a building still under construction.

Super-tall buildings are becoming more common. Because of the unique construction challenges, super-tall buildings can take two to three years longer to fully complete than a typical high-rise building. Because of the construction methods used for these buildings, an early phase may be fully ready for occupancy before the remaining phases are fully complete. If the Building Code be amended, it may seek to establish clarity through prescriptive requirements for partial occupancy in these circumstances. This change would reduce delays and reduce carrying costs incurred by developers that can increase the cost of residential units and negatively impact affordability, and support More Homes, More Choice Ontario’s Housing Supply Action Plan, by supporting earlier delivery of new housing supply.

There are important health and safety considerations related to this proposed Building Code amendment. Fire safety and protection features would need to be complete before a portion of a super-tall building can be occupied. As well, all measures would need to be in place for firefighter and other first responder access and operations. Building mechanical, plumbing, energy and electrical systems would need to be

designed and installed to allow for phased occupancy. As well, all construction site safety measures would need to be fully in place and maintained to protect occupants, residents, and members of the public from overhead hazards due to construction, and to protect building occupants against the spread of dust, as well as the attenuation of sound from construction sites.

### **Existing Partial Occupancy Requirements**

Currently, the Building Code allows the partial occupancy of high buildings, when certain stages of construction are complete, including that the building's structure and enclosing walls are completed to the roof. Occupancy requirements in the Building Code are intended to ensure the health and safety of the building occupants and the members of the public that will be allowed into or near the partially completed building, including onsite construction trades, first responders and passersby. In addition, the requirements also help ensure the orderly occupation of a building still under construction.

Under the Building Code, municipal chief building officials, or their designates, are responsible for issuing occupancy permits for buildings, including those still under construction. The current requirements of the Building Code are generally interpreted that the structural elements of a building, as well as the exterior enclosing walls, must be completed to the roof before a chief building official can issue an occupancy permit to partially occupy a building.

For existing provisions, click on the icon:



Phased Occupancy

### **Consultation Discussion Items – Partial or Phased Occupancy of Super Tall Buildings**

1. If the Building Code was amended to establish new requirements for the partial occupancy of super-tall buildings:
  - a. Should early occupancy be allowed:
    - in accordance with a detailed and prescribed list,
    - at the chief building official's discretion, or
    - a combination of a detailed list and at the discretion of the chief building official?

**OAA's response:**

**Parameters for Partial or Phased Occupancy are fairly well-defined in the Ontario Building Code. Additional clarity could be added around fully enclosed Buildings.**

Superstructures are likely to be complete well before any Partial / Phased Occupancy may be ready. A building that is not enclosed will need to be reviewed for installation of materials directly above or adjacent to occupied areas.

There are numerous safety and environmental issues that may impact an occupied area while the envelope remains in progress. Considering the potential risks, it may be advisable to have a fully enclosed building prior to allowing partial or phased occupancies.

Having a detailed and prescribed list ensures consistency throughout the province as this is a matter of life safety, and ensures coordinated efforts by all parties involved in the delivery of construction projects.

- b. Should a request to allow partial occupancy of super-tall buildings be required to be submitted at the time of the building permit application, or should permit holders be permitted to request partial occupancy at any time during the construction process?

OAA's response:

To manage expectations, Phased Occupancies are better managed when included in the building permit application documents. Attempting to stickhandle Phased Occupancies during the construction process, with minimal forewarning, is precarious at best. Phased Occupancies should be clearly defined in bid documents as well, so contractors have a clear understanding of Phased Occupancy requirements that are to form part of the bid.

Also, if done during the application for permit for Phased Occupancies, it will be easier and more straightforward to establish a plan/delineate areas that are to obtain Phased Occupancy. It is also easier to plan/separate building systems (MEP, fire protection, etc.) so they are complete, commissioned, and functional for the phase seeking occupancy. It would be very difficult to create this separation during construction, after the design is completed.

- c. What types of buildings should the new occupancy provisions apply to (e.g. based on number of storeys, buildings with podiums)?

OAA's response:

The new occupancy provisions should apply to all buildings. The definition of phased occupancy vs. partial occupancy may need to be reviewed. "Partial occupancy" is used where there are only minor and isolated areas to be completed, completion is within three to six months, etc. "Phased occupancy" indicates larger areas, supporting residential occupancy, etc., and needs to be delineated during permit.

Buildings with podiums likely pose additional hazards as any crane lifting operations would be above some portion of the potentially occupied podium.

- d. Should the Building Code be amended to include a definition of the term “super-tall building”?

OAA’s Response:

It depends.

If the building enclosure is to be complete for all building types, then the definition of the term is not required.

The definition of “super-tall building” should be included if the push is for Phased Occupancy before structure and envelope are complete. Requirements for super-tall buildings should address the issues of safety and environmental risks if the intent is to allow occupancy of buildings with incomplete building enclosures.

- e. Permit holder and/or builder to enter into an agreement with the chief building official that sets out conditions governing the partial or phased occupancy?

OAA’s response:

Agreement to Phased Occupancy is inherent in the submission of Building Permit Applications with documents defining the phasing of occupancy. It may be prudent to apply the same logic if MMAH proceeds with defining “super tall building” in the building code.

2. What extra technical life, fire, health, and safety measures, beyond those the Building Code presently requires in Article 1.3.3.1. of Division C, should be required, if the Building Code was to be amended to allow earlier partial occupancy specifically for super-tall buildings, while construction of the structure continues at higher floors? Are there additional stages of construction that should be required to be completed before occupancy is permitted on lower storeys?

OAA’s response:

Consider the following recommendations that would address:

- Building envelope, structure, acoustic separations, and limitations on structure-borne noise/vibration.;
- Elevators, MEP, and fire protection systems complete and commissioned;
- Security and separation of construction areas versus occupied areas;
- Impact on pedestrian and vehicular traffic in the periphery of the site;
- Additional fire watch 24/7. Enhanced fire protection on construction floors (fire alarm and detection on construction levels); and

- Waterproofing, insulation, and drainage of exposed floor slabs above occupied spaces even if they will eventually be on the interior.

Current partial occupancy clauses allow temporary fireproofing of incomplete shafts—the OAA suggests this must be further refined/defined. For example, if a contractor is working in the shared shaft they'll need to remove the temporary firestopping at some point. There needs to be control over how these shared areas are continuously protected. Further, issues arising from construction, such as air quality, will need to be addressed as phased occupancy occurs. All aspects of human health and safety must be contemplated and addressed should this proposal move forward.

You may also want to consider requiring walk-throughs with consultants, building inspectors, and fire department to fully understand life safety risks inherent in allowing ongoing construction above occupied floors. For example, no heavy loads (beams, joists, window, blocks, equipment) hoisted above occupied areas; pumped concrete is acceptable, but lifted buckets are not.

The goal to have the building occupied more “quickly” should not trump public safety. Every project will be unique. The building code can prescribe a list of minimal requirements, but, ultimately, the risk management exercise and communication between the different stakeholders will be key if this proposal moves forward. Public safety is paramount.

The economics of coordinating such efforts to protect the occupants and support public safety may make Phased Occupancy less advantageous than expected. Sequencing of construction activities may be more onerous for the constructor, and also be difficult from the aspects of warranties and commissioning activities.

3. What additional administrative requirements should be included in a detailed and prescribed list?
  - a. Permit holder and/or builder to enter into an agreement with the Ministry of Labour, Training and Skills Development or fire department?

OAA's response:

Documents submitted for building permit will by extension fall under the requirements of the Ministry of Labour and Training and Skills Development or the Fire Department. The permit documents are the resource for site reviews and training of these parties.

If Phased Occupancy documents are submitted with the building permit application, the documents should indicate delineation of the phases in time and in space. Plans should reflect physical separations/barriers between

construction/public traffic, and into the other areas. Commissioning documents of phased areas should be submitted. Depending on site access and hoisting requirements, occupied areas may need to be barricaded from time to time.

b. Specific supervisory, audit or administrative requirements?

OAA's response:

All should apply in accordance with the terms of Phased Occupancy prescribed in the O.B.C. and the building permit requirements.

Suggestions for consideration include:

- A 24-hour fire warden should be considered, plus security to ensure no unauthorised people have access to areas still under construction; and
- Use of audits or other means to confirm if phased occupancy areas are maintained (no unreasonable interruption of services due to ongoing construction)—responsibility/costs of these need to be under the contractor.

Plans should be submitted to show how barricading will be accomplished for hoisting to the different facades. As this falls under the contractor's responsibility for means and methods of construction, a distinction needs to be made between the design concept for phasing the occupancy that accompanies the permit application and documentation of the contractor's implementation plan to achieve phasing. The latter should be a separate submission after permit issuance, but prior to any application to permit occupancy, and should require review and acceptance by the authorities having jurisdiction.

4. Are there other guidelines, plans, training, or legislative requirements that should be considered as a partially occupied super-tall building remain an active construction site?

OAA's response:

- It permits incomplete buildings to be occupied earlier, but then subjects the occupant to live in the midst of a construction site for what may be an indeterminate amount of time.
- Structure-borne sound is incredibly difficult to control. With the increase in working from home, more people will be faced with it every day. The most vulnerable (children and the elderly/shut-ins) will be the most affected.
- Implications on air quality for occupants must be considered.
- In terms of public protection, the occupants may not be aware of what the environment will be like when they take occupancy of a portion of the building.
- There should be incentives to complete the building as scheduled since the construction activity has a negative impact on the area around the site.

- Facility/property managers need to be aware of what is involved and what is different when they are managing a building shared with a contractor.
- Potentially require written detailed notification of future occupants what the Phased Occupancy entails, and what protections they have (safety, vibration/noise, use of facilities, privacy/security of premise from non-residents, etc.) This may best be included in lease or purchase and sale agreements.
- As super-tall buildings will most likely be located in dense urban areas, review impact on pedestrian and vehicular traffic (which will obviously increase as the building is occupied).
- It may potentially extend the construction timeline as the interim health and safety measures will take time to coordinate with occupants in certain areas of the building and it will result in additional cost.
- Provisions will need to be made to allow first responders to move between occupied areas and areas under construction.
- Occupants will need training on how to respond should a construction incident occur after partial occupancy.

5. Are there any other concerns or feedback related to the partial occupancy of super-tall buildings that you wish to share?

OAA's response:

Early conversations should be held with the building department, prior to submission for building permit, to capture the logic of Phased Occupancy and clarify the sequence of stages and bringing systems online to meet Phased Occupancy requirements. If possible, engage a construction adviser early in the process to gain a fuller understanding of the construction process relative to Phased Occupancy.

There could be serious concerns if the code will allow occupancy before the envelope or structure is complete. If this is pursued, the OAA thinks there should be distinction on phased occupancy and requirements during permitting to reflect this. An architect or other consultant's efforts/scope of work to allow this type of phased occupancy is very different from a partial occupancy that is for a shorter duration/limited area, and it needs to be explicitly planned for. Knowing that some condominium developments experience severe delays, what controls are there to minimize an intended 18-month Phased Occupancy from turning into three years?

This is not just a super-tall issue. Multiple towers sitting on a common podium can be considered as one building by definition. Occupancy of one tower should not require the completion of the envelopes of all towers.



## **Modular construction of multi-unit residential buildings**

Construction of modular or factory-built buildings has existed for decades. This process of construction produces economical, well-built buildings or components of buildings more rapidly than conventional construction. Currently, there are some barriers to its wide-spread use. The Ministry is seeking to enhance the use of modular construction, including housing, in Ontario.

In particular, the Ministry is seeking input on a proposed amendment that would extend a Canadian Standards Association (CSA) standard/approval process to larger factory-built buildings. This standard already applies to factory-built houses.

The Canadian Standards Association (CSA) standard – “Procedures for Factory Certification of Buildings” (CSA A277) - is currently referenced in Ontario’s Building Code. Although the standard includes provisions that would otherwise apply to large buildings, the Building Code presently only provides a clear compliance path for smaller residential buildings (e.g. houses); not for multi-residential and large buildings of other occupancies.

To support the Housing Supply Action Plan and to reduce barriers for the building and manufacturing sectors generally, the Ministry is considering amending the Building Code to extend the application of the CSA standard so that it can be relied upon in respect of the construction of larger buildings.

Because the modules that comprise these larger building projects are built and can be almost completed in a factory and then moved to the building site, the buildings can be constructed more quickly and with less disruption to existing neighbourhoods. As a result, this change would reduce current barriers to the use of modular housing, particularly to address housing need.

## **Background – Modular construction of multi-residential buildings**

CSA Standard - A277-08: “Procedures for Factory Certification of Buildings” – has been in use in Ontario for many years for houses, and requirements for using this standard are well known to building officials.

A modular building is built using prefabricated components or modules. It is constructed partially or completely off-site in a manufacturing facility under the certification program administered by the agencies accredited by the Standards Council of Canada, and then transported to a property and assembled there.

The CSA standard provides requirements for:

- certification of the factory quality program
- certification of the modules
- auditing the factory quality program
- in-factory inspection of the modules

When modules that comprise a house are built according to this standard in Ontario, they do not need to be inspected by municipal building officials in the municipality where the building will be located. This is because the Building Code deems houses that are designed and constructed in compliance with the standard to comply with the Building

Code. The standard includes processes for inspection and quality control by certified inspectors to help ensure that the factory-built modules meet Ontario's Building Code. Municipal building officials are still responsible for inspecting the foundation and other site work on the property where the building will be located and for inspecting the building after the modules arrive on the property and are connected to each other.

These larger modular buildings have been constructed elsewhere in Canada, particularly in provinces (Quebec and Alberta) that do not restrict the use of the CSA A277 to houses. In Ontario, by using the alternative solution compliance pathway in the Building Code, larger modular buildings have also been built here, but this can sometimes involve municipal building officials needing to travel to the facility, which can be in another municipality, to do inspections. As a result, inspection processes may take more time and be more expensive than if the standard applied.

Proposed amendments, if made, could:

- A. Add a new Section in Division C, Part 1 to indicate that CSA A277 can also be applied to larger (Part 3) buildings.
- B. Reference the new edition of the standard (CSA A277-16) instead of the old one (CSA A277-08).
- C. For smaller (Part 9) buildings, remove the occupancy limitation and allow the standard to apply to all occupancies along with houses.

### **Existing Building Code provisions for modular construction of multi-residential buildings**

Ontario's Building Code does not reference the CSA A277 standard for Part 3 buildings (e.g. buildings greater than 600 m<sup>2</sup> and higher than three storeys)

Currently, Part 3 buildings are not deemed to comply with the Building Code even if they are designed and constructed to the CSA A277 standard. As a result, inspection processes may take more time and be more expensive than if the standard applied.

Ontario's Building Code currently limits Part 9 buildings that are deemed to comply with the Building Code when they are designed and constructed to the CSA A277 standard, to residential occupancy and does not specify that it can be used for parts of a building.

Ontario's Building Code currently references the 2008 version of CSA A277 (CSA A277-08).

### **Proposed Amendment**

Click on the icon to see the proposed amendment:



Modular  
construction of multi

**Please provide your comments on the proposal, including any additional considerations that should be addressed.** If this change is made, when should it come into effect?

### OAA's response:

- In general, the OAA supports that CSA A277 can also be applied to larger housing (Part 3) buildings.
- The OAA commends the government for taking steps to address the housing affordability crisis Ontario currently faces. By allowing more housing options, such as modular multi-unit residential (Part 3) buildings, government is taking a step to fast-track increased housing supply throughout the province.
- As it pertains to referencing the new edition of the standard (CSA A277-16) instead of the old one (CSA A277-08):
  - Agreed, the updated standard addresses additional concerns, such as;
    - using codes applicable to the where the building will be installed;
    - reference to National Energy Code of Canada where there are no other energy codes in place where the building will be installed; and
    - reference to Authorities Having Jurisdiction (AHJs) for requirements for professional involvement and sealed drawings and specifications.
- As it pertains to remove the occupancy limitation and allow the standard to apply to all occupancies along with Part 9 housing:
  - Consider training programs and additional resources for stakeholders that would support the delivery of modular construction housing. MMAH may consider leveraging the initial work done with the “Building a Modular House” guide. The OAA attended the sessions and the resonating comment heard was the need for training and education. This would result in building expertise and promoting safe and effective practices.
  - Modular construction should be supported within the provincial regulatory framework to be used as a construction delivery model. This model brings with it both benefits and drawbacks. On the positive side, it can:
    - include a greater degree of quality control;
    - reduce energy/carbon spent during the on-site construction and assembly process;
    - reduce solid waste; and
    - allow the ability to integrate BIM design workflows directly with the off-site manufacturing process; further the pre-manufacturing process may be economically beneficial and broaden the availability of quality-controlled construction that has advantages for shipping to remote communities and communities with limited construction or material resources.
  - Challenges and limitations may surface related to transportation size restrictions, and structural span limits.
  - There may be larger impacts from the carbon footprint of the transportation of larger or more massive modules.

### Additional points:

- pre-manufactured construction may improve quality of construction, and reduce health and safety risks to workers, exposing them to fewer “job site hazards” when working inside a controlled environment, as opposed to a job site.
- It is worth noting the CSA document, “*Exploring the Existing Regulatory Framework for Modular Construction in Canada*,” published in July 2021, pointed to a significant knowledge gap within AHJs (particularly in Ontario) regarding the inspection role of the AHJ both off-site and on-site. If this proposed change is implemented, it should be accompanied by educational outreach for both AHJs and qualified professionals.
- Clarification is needed in relation to approvals processes, damaged to prefabricated assemblies during transport or site assembly, and field re-certification following repair of damage.
- Clarification is needed in relation to certification undertaken in other jurisdictions for projects in Ontario, and the qualifications required of those individuals issuing certifications.
- Clarification is needed about what documentation will be needed at permit application to enable the AHJs to determine compliance with applicable law. Will such processes require changes to the normal bidding processes?
- Will public bodies permit sole sourcing of prefabricated housing? If not, how will AHJs review permit applications where the majority of the work will be to any one of several possible pre-fabricated modules that differ in detail, technology, and process?
- Will self-certification by the manufacturer/supplier be relied on as sufficient and to adequately ensure safety of the public or will independent review of the modules in the factory also be required? Lessons may be learned from the aircraft industry and its relationship to the regulators.

### **Truss and lightweight construction notification program**

In 2011, two firefighters - Kenneth Rea and Ray Walter - died fighting a fire in Listowel, Ontario, when a commercial building’s roof structure, which was constructed of a truss and lightweight system, collapsed on them. Subsequently, requirements were proposed to identify buildings that are constructed using truss and lightweight systems. A private members bill was introduced in the Ontario Legislature that would have, if passed, amended the *Building Code Act* and the *Fire Protection and Prevention Act* to require identification of a building that is constructed using truss and lightweight systems to alert firefighters in the event of fire.

The Ministry is proposing an amendment to the Building Code that would require the local building department to provide relevant information to the local fire department (or the clerk of a municipality that does not have a fire department), when a building permit has been issued for buildings constructed using a truss and lightweight system.

This Discussion Paper outlines and is seeking input on potential amendments that would establish a notification program to cover buildings other than houses when new construction is proposed.

### **Background – Truss and lightweight construction notification program**

Truss and lightweight construction systems are commonly used in houses and other buildings in Canada. They are designed to meet Building Code requirements and can be prefabricated and transported to the building site. In many situations, these systems are protected by materials that help to delay the spread of fire. However, they are not required to be protected in every situation. While all buildings are designed so that there is enough time to evacuate people from a building in the event of fire, if the unprotected structural components fail, there may not be enough time for first responders fighting the fire from inside the building to safely evacuate.

Many municipal building departments already provide information to fire departments when certain buildings are constructed so that fire departments can use the information to strategize how to best fight a potential fire. This proposal expands upon these existing local practices to require notification between building and fire departments about planned construction using truss and lightweight construction techniques where a building permit is issued.

Because it is understood by fire departments that most houses built today are built using these floor and/or roof systems, it is proposed that the notification program would not apply to houses.

Building departments can only be expected to provide consistent information on a go-forward basis about new construction when a building permit is issued.

This amendment is proposed to alert fire departments that a building is being constructed using truss and lightweight systems.

Proposed amendments would, if made, generally:

- A. Require that building departments give information to fire departments if a building permit pertains to certain buildings that are constructed or renovated, using lightweight pre-engineered floor or roof systems containing lightweight elements or when solid wood of less than a certain size has been used for these purposes.
- B. Require that the building department provides this notification within 45 business days of issuing the permit and specify what information needs to be provided.
- C. Describe the kinds of systems that need to be reported to fire departments.
- D. Exclude *houses* from the notification requirement.

### **Existing Notification Requirements in the Building Code**

There are currently no notification requirements prescribed in the Building Code for a chief building official to provide information to the municipal fire chief. However, there is precedent for similar notification processes. Article 1.3.1.6 of Subsection 1.3.1 (Permits) of Division C in the Building Code requires the chief building official to provide similar information to Tarion Warranty Corporation. When a building permit is issued for a new home, information about the building permit application is required to be provided to assist with enforcement of the *Ontario New Home Warranty Plan Act* and the *New Home Construction Act, 2017*. This information includes the permit number, the date it was issued, the address where the building is located and other relevant information.

## Proposed Amendment

Click on the icon to see the proposed amendment:



Notification  
Program

### Consultation Discussion Items - Notification Program:

1. Can you suggest other options/alternatives to help fire departments be aware of light weight roof and floor systems in buildings?

OAA's Response - On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). We have therefore omitted notes for this topic.

2. Are there other ways to describe these truss and lightweight systems that would be easily understood by both building and fire departments?

OAA's Response - On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). We have therefore omitted notes for this topic.

3. Are there considerations related to implementation of setting up and maintaining this proposed notification requirement that the Ministry should be aware of?

OAA's Response - On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). We have therefore omitted notes for this topic.

4. Should the requirement specify that the information must be provided in writing?

OAA's Response - On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). We have therefore omitted notes for this topic.

5. How much time would be needed for building departments to establish this program and begin to report?

OAA's Response - On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). We have therefore omitted notes for this topic.

6. Should this proposal only apply to these systems when they are unprotected?

OAA's Response - On March 17, CodeNews Issue 328 addressed the notification program for truss and lightweight construction systems (geared to support fire departments). We have therefore omitted notes for this topic.