



Honorable Stephen M. Casey, Chair, House Municipal Government and Housing Committee  
Honorable Meghan E. Kallman, Vice-Chair, Senate Municipal Government and Housing  
Committee  
Rhode Island General Assembly  
82 Smith Street  
Providence, RI 02903

RE: **Oppose- RI H 7893 / S 2761**

***An Act Relating to Health and Safety – State Building Code***

March 19, 2024

Dear Chair Casey, Vice- Chair Kallman and Members of the Municipal Government and Housing  
Committees,

The North American Modern Building Alliance (NAMBA) of the American Chemistry Council is focused on addressing fire safety through the development of robust building codes and standards for fire performance and fire safety<sup>1</sup>. NAMBA believes that an informed public and robust codes and standards are essential to supporting a multi-layered approach to building fire safety. We also believe ensuring the appropriate level of fire safety in buildings is the joint responsibility of the entire value chain involved in building design, manufacture, construction, and regulation.

**NAMBA respectfully opposes provisions in RI H 7893/ S 2761 that address single exit stairways to serve multiple dwelling buildings up to six stories in height. (Section 23-27.3-100.1.5.10. Point access blocks).**

RI H 7893/ S 2761 revises the Residential Code from one- and two-family dwellings [up to 3-stories in height with separate means of egress] to single-family homes and multi-family buildings up to six (6) dwellings (§23-27.3-100.1.5.9). It will also *not* require either automatic sprinkler systems or fire-resistance-ratings greater than 2-hours for wall, floor, and ceiling separations. Furthermore, the change from two-family dwellings to six (6) dwellings will increase the scope of the Residential Code from two (2) dwelling units to up to 12 dwelling units, significantly increasing the potential occupant load for these buildings.

RI H 7893/ S 2761 specifically burdens the State Building Committee with amending the state building and residential codes to accommodate proposed changes that represent a significant departure from the International Residential Code® (IRC®), decrease fire safety, and increase risk to occupants and emergency responders.

Additionally, the “point access block” provision proposed by this bill (§23-27.3-100.1.5.10) will allow a single-exit stairway to serve multi-dwelling building up to six (6) stories in height. In short, the proposed “point access block” will double the height of the building and halve the number of available exits for

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<sup>1</sup> Members of NAMBA include ACC Center for the Polyurethanes Industry (CPI), ACC North American Flame Retardant Alliance (NAFRA), Atlas Roofing Corp., BASF Corporation, Covestro, DuPont, EIFS Industry Members Association (EIMA), GAF, Huntsman Building Solutions, Kingspan Insulation LLC, Metal Construction Association (MCA), Owens Corning, Polyisocyanurate Insulation Manufacturers Association (PIMA), Rmax - A Business Unit of the Sika Corporation, the Wall and Ceiling Alliance.



building occupants to use to escape a fire. The bill tasks the State Fire Marshal and State Building Commissioner with developing recommendations to enable such “point access blocks” that are contrary to well-established and long-standing fire safety provisions in the International Building Code® (IBC®) and International Residential Code® (IRC®) upon which the Rhode Island State Building codes are based.

**The simplest question to ask when considering an allowance for a single exit is, what if that single (and only) exit is blocked, too small, or otherwise compromised and unusable during a fire?**

*Protecting building occupants through facilitating avoidance of and escape from fire is a foundational principle of fire safety, especially fire safety in the built environment. Modifications to building and fire codes that reduce occupant egress from, and emergency responder ingress to, buildings during fire or other emergency events can result in fire safety concerns.*

- Passive fire safety / protection measures such as building design requirements (e.g., building height and area limitations, fire-resistance-rated construction, fire doors, and building egress, work in concert with active fire safety / protection systems (e.g., automatic sprinkler systems and automatic alarm / notification systems) provide building occupants with the best opportunity to become aware of fires and avoid exposure to fire and smoke.
- The model building and fire code provisions, upon which many state and local building codes are based, requiring multiple egress exits and pathways are carefully developed and maintained using the best available information, research, and experience. Unfortunately, experience in this area is all too often gained from tragedy. Requirements for a **minimum of two exits of specific minimum dimensions** are one example code provisions derived from tragic lessons.

For these reasons, NAMBA requests that the committee reject the proposed changes to code in H 7893/S 2761.

Thank you for the opportunity to submit comments. If you have additional questions, please feel free to contact me at [Indya\\_rogers@americanchemistry.com](mailto:Indya_rogers@americanchemistry.com) or (202) 249-6127.

Sincerely,  
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