

**BSR ES1.4-202x, Event Safety -- Fire Safety  
Public Review 1 Approved Comment Resolutions**

**Reference document:** BSR ES1.4-202x, *Event Fire Safety Requirements* (document number ES/2019-20019r0)

**ANSI public review period:** 27 November 2020 through 11 January 2021

**Question:** Do you recommend that the Event Safety Working Group accept BSR ES1.4-202x, *Event Fire Safety Requirements* (document number ES/2019-20019r0), as an American National Standard?

Please indicate "Yes" (accept it), "Yes with comments," or "No with reasons" (don't accept it).

**Responses:**

Commenter	Yes	Yes, with comment	No, with reasons
Andy Engler, Sync Architecture, P.C. (AE)		X	
Dawn Bellis, NFPA (DB)	No public review form submitted, see attached letter		

**Comment Summary:**

Number	Commenter	Section	Comment	Resolution
1	AE	3.15	Suggestion: Place extinguishers every 75', at main entries and at every emergency exit as practicable. Mounting of the extinguishers shall be on hooks, approved cabinets, or pedestals. Do not place them on the floor or use them as door stops.	Accept in Principle. <ul style="list-style-type: none"> <li>• Revise 3.15 to read "As a minimum, approved, portable fire extinguishers of the type specific to the fire hazard shall be provided and mounted as required by all applicable fire safety related laws, regulations and codes and otherwise should be provided in the following locations:"</li> <li>• Add 3.15.9 to read "At all main entrances and exits."</li> </ul> Add to A.3.15: "Follow all applicable fire safety related laws, regulations and codes when mounting fire extinguishers. Do not place them on the floor or use them as door stops."

Number	Commenter	Section	Comment	Resolution
2	AE	4.1	<p>Comment: the AHJ shall not be expected to perform this work. The AHJ normally should just review the work for accuracy and completeness. This task shall be done by a licensed architect or engineer hired by the producer.</p> <p>Suggestion: your licensed architect or engineer shall compute the occupancy load and submit the data to the AHJ for review and approval.</p>	<p>Accept in Principle.</p> <p>Revise 4.1 to read “Whether inside or outside a structure, a qualified person shall compute the occupancy load for a live event space, submit it to the AHJ for review and approval, and inform the event organizers of the result.”</p>
3	AE	4.1.1	<p>Comment: same as above.</p> <p>Suggestion: your licensed architect or engineer shall compute the occupancy load and submit the data to the AHJ for review and approval. The submission shall be made in a timely manner as required per the AHJ.</p>	<p>Accept in Principle.</p> <p>Revise 4.1.1 to read “The qualified person shall provide the AHJ with accurate information in a timely manner to allow the AHJ to review and approve the occupancy load for a live event.”</p>
4	AE	4.5	<p>Comment: travel distance requirements vary by jurisdiction and Use. Number of exit requirements are more extensive.</p> <p>Suggestion: All event spaces shall have a minimum number of exits as follows:  1 to 50 persons 1 exit.  From 51 to 500 persons 2 exits  From 501 to 1000 3 exits  From 1001 and above 4 exits</p> <p>Maximum travel distance from the most remote point within a space until the exit.  75' max for indoor non sprinklered spaces, including tents.  100' max for indoor spaces with sprinklers  200' max for outdoor spaces at grade</p> <p>Note: in large outdoor festival grounds, the maximum travel distance requirement may be exceeded. Consult with the AHJ for mitigation or special provisions.</p>	<p>Accept in Principle.</p> <p>Add 4.5.1: “For indoor and outdoor event spaces with more than 50 occupants, follow all fire safety related laws, regulations and codes to determine the proper number and location of exits.”</p>
5	AE	4.7	<p>Suggestion: replace Class with Classification or Group to match IBC texts.</p>	<p>Accept in Principle.</p>

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				Revise 4.7 to read “Construction and event planning documents that include information describing occupancy classification, occupant load, number and capacity of exits, fire prevention procedures, fire protection features, and all details associated with emergency services shall be provided to the AHJ for approval.”
6	AE	5.4	Suggestion: replace “Corridor” with Aisle. Corridors (by definition) are fully enclosed, and fire rated.	Accept.
7	AE	5.5.1, 5.5.2	<p>What would be more in line with IBC factors is:</p> <p>For outdoor, open-air event spaces: The minimum exit width shall be 48” wide per every 600 persons @.08” per person. The minimum exit stair width shall be 44” for every 733 persons @.06” per person. For stairs serving spaces with 49 persons or less, the stair shall be 36” minimum.</p> <p>For spaces indoors For spaces with 299 persons or less, the minimum exit door width shall be 32” wide per every 160 persons @.2” per person. The minimum exit stair width shall be 44” for every 146 persons @.3” per person. For stairs serving spaces with 49 persons or less, the stair shall be 36” minimum.</p>	<p>Accept in Principle.</p> <ul style="list-style-type: none"> <li>• Add 5.5.3: “Follow all fire safety related laws, regulations and codes to determine exit stair widths.”</li> <li>• Revise 5.5.1 to read “For outdoor, open-air event spaces: 1.2 meters (3.9 feet or 48 inches) per 600 occupants, and in no case less than 48 inches (1.2 meters).”</li> </ul> <p>Revise 5.5.2 to read “For all other event spaces: 48 inches (1.2 meters) per 200 occupants and in no case less than 48 inches (1.2 meters).”</p>
8	AE	5.7.1	<p>Comment: this seems excessive for back of chair to back or chairs. Normally 3’3” is usable from back to chair to wall if there is a necessity for an aisle along the wall.</p> <p>Suggestion: IBC 1017.4.2 Table and seating accessway width, proposes 1’ between back of chair and back of chair. The chair is assumed to be pulled out at 19” away from the table edge.</p>	<p>Accept in Principle.</p> <ul style="list-style-type: none"> <li>• Revise 5.7.1 to read “Round tables shall be spaced so that the backs of occupied chairs are not less than 1 foot (0.3 meter) apart (chair to chair) or 3.3 feet (1 meter) from a wall.</li> </ul> <p>Revise A.5.7.1 to read “NFPA 101 (2018) and ICC IBC Section 1029 (2018) also describe table spacing and</p>

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			So, between two tables = 19" chair 1 + 19" chair 2 + 12" min aisle accessway = 50" from table edge to table edge.	aisle widths when chairs and tables are used. Assuming 19 inches (0.48 meters) for the distance the chair is pulled away from the table edge, the total distance from table to table is 50 inches (1.27 meters)."
9	AE	6.2	Suggestion: be more specific and list that fabrics on stages, tents, and coverings, but without dining linens shall be tested and pass, NFPA 701. Combustible, decorative, and scenic materials shall be tested by ASTM E84 to determine their Flame Spread Rating. Note that in most cases Class A is the minimum required. Materials shall be selected and treated to meet the minimum requirements.	Accept in Principle. Revise 6.2 to read "Props, curtains, drapes, decorative materials, wall coverings, and floor coverings located and used on a stage must be flame retardant and tested by and pass the requirements of NFPA 701, the IFC, or an equivalent standard acceptable to the AHJ."
10	AE	Other	Additional topics that could be included: Exit door swing – shall always be in the direction of egress. Sliding exit fence gates shall remain in the open position during event hours or as approved by the AHJ. Panic hardware is required on doors serving 50 persons or more. This is often not applicable to outdoor festivals exits but that is as approved by the AHJ.	Accept in Principle.
11	DB	2.0	Please request copyright permission for all definitions copied from NFPA standards	Accept. Copyright requested and granted. Copyrighted definitions are identified in the new revised draft.