Mr. Ulrick Seward
Chair Single Egress Task Group
Canadian Commission on Building and Fire Codes
1200 Montreal Road
Ottawa, Ontario

August 19, 2026

Dear Members of the Single Egress Task Group

Thank you for taking the time to provide comments on the draft two-pager supporting fire chiefs' concerns with single egress construction that CAFC provided. We understand that our document has ended up in the public domain and therefore will respond to comments to correct the record. Although 48 comments on two pages were difficult to decipher, we have responded to most in the attached and would like to provide some overall suggestions:

1. Working Definition: We suggest providing a publicly accessible working definition of Single Egress Construction and the data, background, and rationale for why a decision has been made to advance this modality. While the task group may have been handed a pre-determined mandate, both its members and its deliberations need the transparency of the context.
2. Working with the fire sector: For fire chiefs, single egress construction is a practical issue that involves people, practice, and equipment. The advice we are providing is that removing an emergency exit is not wise at this stage, even with proposed enhancements. If this is not sufficient, the task group may wish to determine how else it might acquire and consider fire operations expertise. Examples might include a controlled exercise, co-designed and mutually agreed upon with the fire sector, which could allow individuals who have not trained as firefighters to better experience what they are recommending.
3. Addressing bias: We ask that the task group undertake and document an explicit bracketing exercise to determine how best to address bias. Individuals tasked to advance single egress mandates or who work in jurisdictions that have already adopted single egress construction, may or may not face consequences if they contribute to findings or advance recommendations that fail to support the decision already made by their jurisdictions.

In closing, we hope that you find the responses to the comments helpful. Again, we appreciate the time taken to review the draft we provided.

Sincerely,

Chief Ken McMullen, CAFC President

Chief Paul Boissonneault, Chair CAFC Codes Committee

Responses to Single Egress Construction Comments on CAFC's Draft

Page 1: Commented [1] [redacted] 5/15/2026 2:28:00 PM

[1]: *The last statement in the Section, re: section 1 above - - Single 'central' stair used for 'all occupant entry and exit' - not necessarily accurate.*

- CAFC Response: Please provide a short working definition for use nationally.

Page 1: Commented [2] [redacted] 5/15/2026 2:30:00 PM

Why is SEC/SSD discussed section above

- CAFC Response: This question is not clear to us.

Once CAFC is presented with cost data, are they going to update this section?

- CAFC Response: CAFC would have to see the data first.

Page 1: Commented [3] [redacted] 4/17/2026 7:53:00 PM

The last statement in the Section, "Why is SEC/SSD discussed?" seems to imply that no data has been provided to any fire chiefs, ostensibly including empirical analysis for alternative solutions which have been administered in several Canadian jurisdictions, including in my experience the City of Edmonton. How is this statement meant to be understood given this information?

- CAFC Response: The CAFC has not received any rationale for undertaking single egress construction, which has serious implications for fire operations.

Page 1: Commented [4] [redacted] 4/17/2026 8:27:00 PM

There have been other examples of research into the safety of single exit buildings in particular- does this report contradict this statement?
https://www.pew.org/en/research-and-analysis/reports/2025/02/small-single-stairway-apartment-buildings-have-strong-safety-record

- CAFC Response: Please see response to the Pew Report from the National Fire Protection Association (NFPA): https://www.nfpa.org/news-blogs-and-articles/blogs/2025/10/07/nfpa-president-responds-to-pew-trusts-report

Page 1: Commented [5] [redacted] 4/17/2026 9:00:00 PM

This appears to be a misrepresentation of the Code - the first NBC was published in 1941, which does not seem to have been in response to devastating fires across North America. It was predominantly to consolidate safety standards more broadly, addressing the patchwork of codes and standards at the time. The Foreword of the 1941 NBC is exceptionally helpful in establishing this basis, as is the excellent paper, "A Brief History of the National Buildings Code of Canada" by Archer, 2003.Further the NBC 1941 did provide for a wide range of single-exit configurations, including for residential apartments (up to three stories without sprinklers) and

*office buildings with floor areas up to 6000sqft, and travel distances no more than 50', with non-combustible construction *excluding* sprinkler protection (for offices). Single exit buildings were very much permitted by the 1941 NBC (4.6.5.2.(c)(v)).*

- CAFC Response: The requirement for two exits was introduced [at some point] into the code. Now, there is a code change proposal to remove one of those emergency exits [i.e. for single egress construction]. As such, from a fire operations perspective, this is not an innovation, but a regression.
- Please reconsider use of the word “misrepresentation” in responding to concerns and opinions expressed by others, particularly if there are few if any other sources of fire operations expertise in your discussion.

Page 1: Commented [6] [redacted] 4/17/2026 9:06:00 PM

I disagree with how this sentence is presented as it implies that the design is simply a "removal"of a building feature, disregarding the holistic aspects of the overall building. It misleads readers to think that these buildings are the same, except for one fewer exits. This oversimplification of both the design process and building occupant safety in general is misleading. Referring to pre- WWII construction for example is ignorant of the presence and very-well studied effectiveness of sprinkler systems. This also completely overlooks that there are instances where the code regulates single exits for other uses (even currently). Suggesting there are "always two ways, and that's always been the case" is simply wrong.

- CAFC Response: The requirement for two exits was introduced [at some point] into the code. Now, there is a code change proposal to remove one of those emergency exits [i.e. for single egress construction]. As such, from a fire operations perspective, this is not an innovation, but a regression.
- Please reconsider use of the words “oversimplification” and “misleading” in responding to concerns and opinions expressed by others, particularly if there are few if any other sources of fire operations expertise in your discussion.

Page 1: Commented [7] [redacted] 4/17/2026 7:57:00 PM

Incorrect. For this statement to be true, the code would also need to remove firestopping, fire compartmentation, fire resistance ratings, ventilation, sprinklers, alarms, signals to fire departments, pressurization or ventilation, assumptions on fire service, and more.

- CAFC Response: There is a code change proposal to remove an emergency exit (while including other enhancements). From a fire operations perspective, the other enhancements do not replace the need for an emergency exit. The code change is primarily focussed on a single means of egress. The alternative measures are insufficient.

Page 1: Commented [8] [redacted] 5/15/2026 2:32:00 PM

In the box above it states 'removing an exit means removing an entrance' - this needs to be clarified because a building may have multiple entrances

- CAFC Response: Providing a working definition of single egress construction would be helpful.

Page 1: Commented [9] [redacted] **5/15/2026 5:54:00 PM**

General comment on these studies; most of the studies cited are looking into exit choice in scenarios where participants or computer simulated agents choose between 2 doors in a single-room (i.e., not a full building).

- CAFC Response: The overall findings which may reference a specific scenario, but they also correspond to our general experience.

Page 1: Commented [10] [redacted] **3/23/2026 1:56:00 PM**

Generally speaking I would suggest providing the full references, either as footnotes or at the end of the document. For example, there are multiple studies (unrelated to the topic) that could be cited as Wei et al. 2023.In this example, I believe the following reference is intended: Wei, X., Lou, Z., Song, H., Qin, H.,& Yao, H. (2023). Exploring the impacts of exit structures on evacuation efficiency. Fire, 6(12),462.

- CAFC Response: CAFC is looking for ways to convey experiential information in a manner familiar to readers who would not have fire operations experience. If the literature were complete and reliable for fire operations' experience, we would not need to intervene in the discussion.

If this is correct, I would also suggest reviewing the reference. The study was a simulation study which compared flow rates in exits with 100-500 pedestrians that was mostly interested in exit width. If I read the study correctly (I only skimmed it), there were scenarios in which a single exit performed better than a 2-exit scenario. The authors also write "It is worth emphasizing that practical building exits typically incorporate doors or gates, while Exit 3 remains confined to the realm of theoretical research and is not directly applicable to real architectural structures."

- CAFC Response: These comments are aligned with our operational experience.

Page 1: Commented [11] [redacted] **3/23/2026 2:04:00 PM**

I think this citation might be referencing this study: Johnson, N. R., & Feinberg, W. E. (1997). The impact of exit instructions and number of exits in fire emergencies: A computer simulation investigation. Journal of Environmental Psychology, 17(2), 123-133. If that is correct, the study only considered scenarios with a minimum of 2 exits in a single room (I think 2, 3,4, and 5 exits) and the assumption is made that the room is occupied by 200 people. Let me know if you need help with accessing the paper.
https://www.sciencedirect.com/science/article/pii/S0272494497900475
Given that this study is a modeling study from 1997 it is likely outdated (for example significant advances in crowd modeling were made in the early 2000s).
In general, there are very few studies that directly study single vs dual egress. The only ones that I am aware of are these:
M. M. Islam, "Assessment of single-stair design in high-rise buildings when compared to two stairs," M.S. thesis, Fac. of Engineering and Architecture, Ghent Univ., Ghent, Belgium, 2024. [Online]. Available: https://lib.ugent.be/fulltxt/RUG01/003/213/074/RUG01-003213074_2024_0001_AC.pdf
Ndlovu, S., Fowler, J., Catelblanco, G., Khan, K., Graham, T. L., Bradford, T. E., ... &

Asimakopoulou, E. (2025). Experimental Investigation of Strategies Aiming at Effective Fire Evacuation using Evacuation Alert System in Single and Dual Staircase High-Rise Residential Buildings. In Interflam 2025.
https://knowledge.lancashire.ac.uk/id/eprint/56335/

(The study is not publicly available, but the authors would likely be open to sharing it)

- CAFC Response: Thank you. The points in the articles cited align with our experience. There is also awareness of how the codes are applied in alternative solutions. The authority having jurisdiction may have code concerns that existed before the operational concerns and that are being exacerbated by SEC.

Page 1: Commented [12] [redacted] 3/23/2026 1:31:00 PM

These 2 bullet points reference an academic study on exit choice that I co-authored while I was a postdoc at Brown University. The quotation in the first bullet is not from this study and appears to be taken out of context. I think the authors refer to another study that I co-authored while at Brown about the color of exit signs:
https://www.sciencedirect.com/science/article/pii/S0003687018302837?via%3Dihub
(the study showed that participants were more likely to choose exits with a green colored exit sign, even when they stated that red would be a better color).
If the quotation is included, I suggest including
(a) the correct citation/reference (Kinateder, Warren & Schloss, 2019) and
(b) change how it is used. Critically, the original paper highlights the speculative nature of the statement: "Observers, and perhaps designers, do not always anticipate how occupants will behave in emergency situations, which emphasizes the importance of behavioral evaluations for egress safety."

- CAFC Response: We would caution against concluding that our comments are not in context. What we are saying is that there is alignment between what is reported in a specific context and our more general experience in real world settings.The following general conclusion remains plausible: *"Observers, and perhaps designers, do not always anticipate how occupants will behave in emergency situations, which emphasizes the importance of behavioral evaluations for egress safety."*

The second bullet point is about the core findings of the Warren & Kinateder, 2021 study, which showed, when people can choose between 2 exits (from a room) that decision is influenced by the behavior of others as a function of crowd size and the uniformity of the crowd. Essentially, participants were more likely to avoid the busier exit when there were more people in front of them. One possible interpretation of this finding is that having to choose between two exits could potentially delay the evacuation decision. Link for reference.
https://www.sciencedirect.com/science/article/pii/S0378437121000182?via%3Dihub#sec4. For additional context: Neither study is an NRC study. The affiliation with NRC appears because I had joined the NRC when the paper was published. Let me know if you have trouble accessing the papers.

- CAFC Response: Thank you. Again our experience supports the comment.

Page 1: Commented [13] [redacted] 4/17/2026 9:08:00 PM

This is misleading and misrepresents fires in the context of other factors such as fuel

availability, ventilation, and crucially fire suppression systems. Suggesting this is the expected fire growth rate relative to a full sprinkler protected building is misleading at best.

- CAFC Response: As discussions unfold, please reconsider the suggestion that individuals with experience in fire operations are misleading or misrepresenting issues. They are participating in a conversation to which they have been invited.

Page 1: Commented [14] [redacted] **4/17/2026 6:38:00 PM**

The Jensen Hughes report did not suggest that 8-10% of fires start in stairwells. The Jensen Hughes report included that statistic based on what fire services had told them, as there was no available data to validate the statement.

- CAFC Response: It was presumably cited by Jensen Hughes because it was material.

Page 1: Commented [15] [redacted] **4/17/2026 9:17:00 PM**

Even if the fire initiation statistics were true, the conclusion that there is no entry or exit in these cases oversimplifies building fire safety by implying that the only method of protection in a fire escapes. This contradicts concepts in fire safety including utilizing areas of refuge.

- CAFC Response: Please reconsider the suggestion that individuals with experience in fire operations are oversimplifying issues, concerns, or advice.

Page 1: Commented [16] [redacted] **4/17/2026 9:19:00 PM**

This is a logical stretch, as exits are not only not regulated to ensure entry, but from the fact that many exits are designed to specifically prevent entry, both through mechanical design, and relative location to emergency access routes. This would seem one of the important considerations for principal entrances and access routes for responders which are already regulated by the building code.

- CAFC Response: Please reconsider language suggesting individuals with experience in fire operations are stretching logic.

Page 1: Commented [17] [redacted] **4/17/2026 7:53:00 PM**

This is not an assumption under the code.

- CAFC Response: Thank you. Assumptions on firefighting operations must be included for discussion on SE because single egress impacts fire operations.

Page 1: Commented [18] [redacted] **4/17/2026 9:20:00 PM**

I can find no aspect of the building code regulations which either requires, or assumes aerial devices are used. For example, above grade access for sprinklered buildings is not even regulated, and aside from access routes (which are generally not required to be located proximate to any building feature other than the principal entrance) there are no designed staging location for aerial devices. That fire services can utilize aerial devices does not automatically imply that they are necessary for the building to provide an expected level of life safety and property protection.

- CAFC Response: Assumptions on firefighting operations must be included for discussion on SE because single egress impacts fire operations.

Page 1: Commented [19] [redacted] **4/17/2026 9:22:00 PM**

This disregards that ladder access by firefighters is both contemplated and regulated by the building code in Subsection 3.2.5. - but also that above grade access is not required for sprinkler protected buildings.

- CAFC Response: Assumptions on firefighting operations must be included for discussion on SE because single egress impacts fire operations.

Page 1: Commented [20] [redacted] **4/17/2026 9:24:00 PM**

Emergency access is regulated by the building code - how does a single exit building affect these existing regulations/situations? What consideration is given to the fact that many existing buildings, with the existing provisions for emergency access, also lack sprinkler systems – what is the relative impact/safety of these existing buildings? What effect does sprinkler protection have on the effect of response level, and timeliness? It would appear that newer sprinklered buildings improve the existing emergency access issue by providing additional time for firefighters to undertake firefighting activities.

- CAFC Response: Thank you. Assumptions on firefighting operations must be included for discussion on SE because single egress impacts fire operations.

Page 1: Commented [21] [redacted] **4/17/2026 9:28:00 PM**

This appears misleading, as suppression systems are regulated and designed to be monitored for operation/tampering, and Fire Code's across Canada explicitly mandate both responsibilities for this operation and maintenance but also employ enforcement mechanisms to ensure this is done. Arguing that sprinklers are unreliable therefore ignores the existing research on sprinkler effectiveness (they are exceptionally reliable) as well as the obligation for (in most cases) the Fire AHJ to oversee inspection testing and maintenance regulation.

- CAFC Response: Our experience is that sprinklers can be subject to failure.

Page 1: Commented [22] [redacted] **4/17/2026 7:54:00 PM**

The building code assumes that these systems exist. This statement is risky as it implies that sprinklers and alarms may not be needed for acceptable levels of safety.

- CAFC Response: CASA may be able to provide information on the correct use of sprinklers. Even if sprinklers work, there are times when the municipality will require that they be shut off. It is during these periods where you will not have a sprinklered building.

Page 1: Commented [23] [redacted] **4/17/2026 9:25:00 PM**

It is not clear in what way these systems are "over-relied" upon - what is the basis for this argument?

- CAFC Response: It is based on the removal of an emergency exit justified by the inclusion of other fire protection mechanisms.

Page 1: Commented [24] [redacted] **5/15/2026 3:18:00 PM**

To some extent all sprinklered buildings 'over rely' on sprinklers and fire alarms - it's not just single egress buildings.

- CAFC Response: Firefighting assumptions are relevant, and are associated with any conversations on single egress and changes for fire and life safety; they become relevant the more you create a single point of failure in building constructions.

Page 1: Commented [25] [redacted] **4/17/2026 9:42:00 PM**

Its unclear how this can be argued in buildings without voice communication systems (i.e. six storeys and under) - how exactly are the stairwells delegated, how are occupants informed, and given the relative evacuation times of these smaller buildings, how is this even relevant? This feels like an argument in principle based on assumptions which do not even apply to the building types in question. Are there any SOP's or training which detail how this can actually be achieved by the fire service?

- CAFC Response: We are not able to find the sentence to which this refers.

Page 1: Commented [26] [redacted] **4/17/2026 7:54:00 PM**

Where does this requirement come from?

- We are not able to find the sentence to which this refers.

Page 1: Commented [27] [redacted] **4/17/2026 9:44:00 PM**

It's not clear what this point is suggesting - I think it is making a suggestion for elevator design to be included as a consideration, but it's not clear. This is a good place to convey that evacuation of people with physical disabilities is an existing and serious issue in most buildings where elevators cannot be used as evacuation routes. SES buildings are neither unique in this regard, nor a greater issue than any other multi-storey building, the exception of course being compared to unsprinklered buildings.

- CAFC Response: SEC exacerbates the concern.

Page 1: Commented [28] [redacted] **4/17/2026 9:45:00 PM**

This narrative of a "single point of failure" doesn't make any sense, even as it is explained here.If the single point of failure is the stair, why does it also rely on failure of the sprinkler system, which itself requires failure of the maintenance/operation of that sprinkler, etc etc. This type of argument can best be framed by considering the fire safety concepts tree, which can help structure and isolate how performance is achieved through interconnected features/systems. Why not reference NFPA 550 or 551 here? Doing so is a fantastic way to trace what failures must occur in order for fire safety objectives to be lost.

- CAFC Response: SEC is proposing to replace an emergency exit with systems that could fail.

Page 1: Commented [29] [redacted] **5/15/2026 2:37:00 PM**

This could easily be addressed in TG-SE-RAs work, using the fire safety concepts tree, as Cameron has pointed out.

- CAFC Response: We do not know what this refers to.

Page 1: Commented [30] [redacted] **4/17/2026 9:52:00 PM**

What data is there to suggest that combustible construction contributes to fire safety outcomes relative to these types of building, specifically the outcomes for occupants? Significant research has been conducted in Canada to support combustible construction through demonstrating acceptable fire safety performance. This is particularly relevant given the relatively short evacuation times implied by these built forms - suggesting combustible structural elements contribute to fire growth and negative life safety outcomes within this timeframe suggest (much like with the critique against sprinkler effectiveness) that aspects such as maintenance/modification outside of permits are an important factor.

- CAFC Response: The fire sector is not asking for a code change to enable single egress construction.

Page 1: Commented [31] [redacted] **4/17/2026 9:56:00 PM**

I think information on these differences could be very valuable for this discussion; the distinction is also more usefully between typical and single exit buildings of similar heights, not the difference between 3 and 6 storey buildings. What is the argument being made here with respect to SES buildings to suggest aspects of them require a greater deployment relative to a similar building with two (or more) exits?

- **CAFC Response:** This is a good question to discuss with NFPA.

Page 1: Commented [32] [redacted] **4/17/2026 7:55:00 PM**

I believe that there has been considerable discussion and consideration of adequate water supplies in current code discussions. Curious why the statement that code system has not considered it.

- CAFC Response: This is the advice given to fire departments by the Fire Underwriters Survey (Verisk).

Page 1: Commented [33] [redacted] **5/15/2026 2:40:00 PM**

My understanding - typically the water supply aspect would have to be resolved by the municipality/building/fire department before the building could be built.

- CAFC Response: The problem remains even if it's not a code problem.

Page 2: Commented [34] [redacted] **5/15/2026 2:52:00 PM**

regarding the 'training burden' section in the 'overtaxing the system' section - what does training look like for single egress buildings? How does it differ from other buildings?

- CAFC Response: Perhaps the task group or NRC could research this. CAFC would not be able to dedicate time to this under its current resource constraints.

Page 2: Commented [35] [redacted] **4/17/2026 10:02:00 PM**

regarding the first point above, "increases in climate emergencies. . ." it is not clear what point is being made. From this it could just as easily be argued that replacing existing buildings with

newer ones (which are in general safer because of the application of modern safety regulations, specifically including sprinklers) is important now to reduce the risk associated with older buildings. PEW has done some excellent work here as well: https://www.pew.org/en/research-and-analysis/issue-briefs/2025/09/modern-multifamily-buildings-provide-the-most-fire-protection

- CAFC Response: Our advice remains the same. The Pew Foundation is not a recognized organization for fire operations expertise. The report is not peer reviewed. It is led by a US based proponent of single egress construction.

Page 2: Commented [36] [redacted] 4/17/2026 10:03:00 PM

with respect to the comment above ". . .assemblies of those materials are not currently tested…." it is unclear what is being stated/implied, or how mass timber is relevant in this context.

- CAFC Response: We would encourage more reflection on this. Eventually, all code changes will be subjected to a cumulative impact assessment. The analysis of single egress construction in a vacuum is not how single egress construction will be experienced or lived in.

Page 2: Commented [37] [redacted] 4/17/2026 10:07:00 PM

regarding the comment above, ". . .NFPA risk standard of buildings requiring. . ." it is unclear why these proposed buildings require additional firefighters relative to non-single-exit buildings. What specific characteristics and tasks support this conclusion (for example, using. 1710 – what are the additional firefighters doing?)

- CAFC Response: This would be a good question to speak to NFPA about.

Page 2: Commented [38] [redacted] 4/17/2026 10:08:00 PM

with respect to the comment above, "NFPA training assumes two exits." This would be helped significantly by a citation. There are many single exit buildings (historical) throughout North America - is this comment suggesting that fire services are not trained to address those? And what about the fire services which have decades of direct experience with SES - notably Seattle doesn't even feel the need to keep track of where these buildings exist, and it seems the Seattle Fire Service has no issue with respect to lack of training.

- CAFC Response: Firefighting assumptions are relevant in SEC because SEC removes a significant fire operations feature from a building. The Seattle Fire Department is not a member of the Canadian Association of Fire Chiefs.

Page 2: Commented [39] [redacted] 4/17/2026 10:13:00 PM

With respect to international comparisons, it would be easier to say that international comparisons are impractical simply because there is too much complexity and differences between most regional codes to be able to single out a specific feature like this (i.e. apples and oranges). Therefore, safety and performance of new designs should be compared to the buildings/safety performance we currently allow within our regulations. i.e. there is no need to compare to others internationally when we can focus on comparing proposed designs to our own, current regulations.

- CAFC Response: This is a good comment.

Page 2: Commented [40] [redacted] 4/17/2026 10:17:00 PM

This is a hyperbolic argument which is contradicted by the number of alternative solutions(successful analysis demonstrating equal or better performance) which have been conducted. This is where tools such as the fire safety concepts tree developed by NFPA are so useful for comparative analysis - code changes which do not impact relevant fire safety concepts can be shown to be irrelevant.

- CAFC Response: Firefighting assumptions are relevant in SEC because SEC removes a key fire operations consideration from a building. Please reconsider suggesting to stakeholders that their arguments are hyperbolic.

Page 2: Commented [41] [redacted] 4/17/2026 10:19:00 PM

It is a clear straw-man to suggest that "sprinklers replace an exit" - I am not aware of this position from any stakeholder on this issue.

- CAFC Response: This argument has been advanced in the public domain by various architects and engineers. If this is not the view of the task group, being clear about what SEC is, why it's being proposed, and what it thinks SEC construction means for fire operations would help.

Page 2: Commented [42] [redacted] 4/17/2026 7:51:00 PM

Sprinklers are never intended to "displace an emergency exit." This statement is risky as it implies that sprinklers may not be needed in buildings.

- CAFC Response: The argument has been advanced in the public domain by various architects and engineers. This is where the task group can aid the discussion by being clear about what SEC is, why it's being proposed, and what it thinks SEC construction means for fire operations.

Page 2: Commented [43] [redacted] 4/17/2026 10:22:00 PM

Suggesting that sprinklered buildings represent a risk because some municipalities do not enforce sprinkler maintenance is hard to understand - and ignorant to the fact that local AHJ's can (and are directed to) reject buildings for which their municipality is not equipped to address through the Notes to Part 3. Further, enforcement of sprinkler maintenance is not the same as the regulatory requirement that the owner conduct inspection testing and maintenance. I am unaware of, but interested in any examples of municipalities that, due to their lack of enforcement of the Fire Code, disallow sprinklered buildings in their jurisdiction.

- CAFC Response: This argument has been advanced in the public domain by various architects and engineers. The task group can aid the discussion by being clear about what SEC is, why it's being proposed, and what it thinks SEC construction means for fire operations.

Page 2: Commented [44] [redacted] 4/17/2026 7:52:00 PM

I don't see the false logic here. Both buildings would be sprinklered under current code.

- CAFC Response: This argumentation has been advanced in the public domain by various architects and engineers in the Globe and Mail. A method problem arises from modifying both size and number of exits simultaneously in different directions and using this to comment on the relative safety of single egress construction. The task group can aid the discussion by being clear about what SEC is, why it's being proposed, and what it thinks SEC construction means for fire operations.

Page 2: Commented [45] [redacted] 4/17/2026 10:24:00 PM

The comparisons to acceptable buildings especially with respect to the impact to occupants including responders is absolutely relevant, and is 100% supported by the alternative solution process which has been in the code since 2005 as a tenet of our Objective Based Codes.

- CAFC Response: Assumptions on firefighting operations must be included in discussions on SEC. SEC removes a current fire operations component.

Page 2: Commented [46] [redacted] 4/17/2026 10:32:00 PM

Oh, I see, the comment was on the size. Agreed with Cameron. The point of the analysis this way is to determine what the minimum level of safety is. Without this comparison this way, we would essentially be suggesting that a larger, code max building is safer - with 50-100m of corridor between stairs and unlimited occupants.

- CAFC Response: Our advice remains the same.

Page 2: Commented [47] [redacted] 4/17/2026 10:26:00 PM

with respect to the above comment, "it is not advisable for architects. . ." - it is not clear what assumptions are currently being made, and what information ought designers to have? This problem is different on the local/alternative solution level, where AHJ's can (and should!) provide information on the capabilities of their fire service, but what assumptions can be made at a national level other than instructing designers to look at the Notes to Part 3 Firefighting Assumptions?

- CAFC Response: Several architects and engineers have been quoted in newspapers speaking on fire operations issues. One even provided a session for which attendees received Continuing Education Credits.

Page 2: Commented [48] [redacted] 4/17/2026 10:27:00 PM

This appears technically incorrect - there is no specific deployment for a six storey building, and what is being quoted here appears to be a high-rise, which overstates the archetypes for SES being discussed. How is 1710/1750 being used here?

- CAFC Response: Further clarity is required to answer the question.

Page 2: Commented [49] [redacted] 5/15/2026 2:44:00 PM

point 7 above - this can be said for 2 exit buildings as well.
Page 2: Commented [50] Cameron Bardas 4/17/2026 10:28:00 PM
This sounds interesting - a citation would be very welcome!

- CAFC Response: We appreciate the curiosity.

Page 2: Commented [51] [redacted] **4/17/2026 10:29:00 PM**

Its a shame that this doesn't include probably the most valuable reference - alternative solutions- as these can be used as supporting evidence that SES buildings can be just as safe or safer through empirical evaluation using engineering best-practices. Why was this not included? The CAFC has previously raised this at the NFPA Symposium - why not advocate for excellent alternative solutions?

- CAFC Response: CAFC is a member driven organization. A possible recommendation could be for single egress construction to be handled through alternative solutions rather than through a code change.

Page 2: Commented [52] [redacted] **4/17/2026 10:34:00 PM**

It is unclear to me what characteristics of the Grenfell disaster are applicable/contextual in this discussion. If there are aspects of Grenfell which are applicable here, it would be useful to everyone if they were clearly stated - our collective ability to learn from and apply lessons from that tragedy are dependent on public safety stakeholders faithfully and accurately communicating them.

- CAFC Response: The quote is about the similarity of circumstances in which advice and information are dismissed.

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I am interested in how these numbers in this section inform this discussion - what is it about each of these that suggest there is a critical issue with respect to single exit buildings?

- CAFC Response: The statistics are a reminder of the size and diversity of the fire service organizations that may be impacted by SEC.