

## Questions Regarding the Engineering Practice letter regarding Design of Fire Protection Systems

### Questions:

1. ORS 672.002 to 672.325 do not apply to: (1) A registered architect practicing architecture. Is the design of fire protection systems considered the practice of architecture?

ANSWER: Awaiting OSBEELS response.

2. When should a fire protection system be considered complex and therefore required to be designed by an Engineer and not an Architect? See: Reference Manual for Building Officials: The Architects' Law and the Engineers' Law / Sixth Edition

*Case C:* A project consists of a large shopping mall with nine acres of parking. An architect would be required for the functional building design. The architect or engineer would be required to provide the design of the building systems, and engineers would be required where the systems are complex. While the parking lot could be considered "an appurtenance to the building" according to architects' law, thus allowing architects by law to provide the design, many local jurisdiction storm water quality requirements are much more complex, and lend the need for engineering services.

ANSWER: Awaiting OSBEELS response.

3. Does the following submittal meet the intent of ORS 672?
  - An architect provides specifications for the fire protection system in their design documents,
  - A fire protection contractor produces shop drawings consistent with the architects specifications but does not submit with an engineers stamp,
  - The architect reviews the fire protection design and stamps them as being consistent with the specifications

ANSWER: Yes. It follows the process accepted in the Position Statement, "The Engineer and the Engineering Technician Designing Fire Protection Systems", dated June 6, 2008 published by Society of Fire Protection Engineers (SFPE) National Society of Professional Engineers (NSPE), National Institute for Certification in Engineering Technologies (NICET) and accepted by OSBEELS as conforming to the intent of ORS 672.

4. Some fire protection systems are packaged pre-engineered systems with testing laboratory approvals when installed according to the manufactures instructions. Do pre-engineered systems require the stamp of an engineer? If the answer is yes does it engineer require an Oregon License?

ANSWER: No, provided the design professional specifies the system in their design documents.

5. If fire protection devices are relocated on existing systems is this considered system design that requires stamped design plans?

ANSWER: No, this is not considered the practice of engineering as long as the relocations are done within the design criteria of the original design.

6. If fire protection devices are added to an existing system that extends the system into areas not previously protected is this considered system design that requires stamped design plans?

ANSWER: Yes, this is considered the practice of engineering.

7. The City of Portland requires a permit application but does not require plans for minor alterations of fire protection systems subject to field approval. Is this work considered system design that requires engineered design and seal?

ANSWER: No. See #5 above.

8. The “Reference Manual for Building Officials: The Architects’ Law and the Engineers’ Law / Sixth Edition” states on page 13, “**Considerations for Building Officials When Issuing Building Permits, Is an architect or engineer required on a project?.....**”

“The architects’ and engineers’ laws and rules provide an area where a person who is not registered as an architect or engineer may plan, design, and supervise the erection, enlargement, or alteration of a building. These buildings are considered **exempt**.

The following are exempt from the architects’ and engineers’ laws:

5. The planning, designing, specifying, or supervising of the alterations or repairs to a building when the structural elements of a building are not involved, or when the occupancy or code-related classification of the building, or portion of the building, has not changed.

See also page 24

May an unregistered individual prepare plans and specifications for interior space planning and/or remodeling of non-exempt structures? Yes. Under ORS 671.030(2)(d), nothing in the law would prevent “*a person from planning, designing, specifying or supervising the alterations or repairs to a building if: (A) the structural part of the building, including but not limited to the foundation, walls, floors, roof, footings, bearing partitions, beams, columns, and joists is not involved; (B) the building code classification by use or occupancy of the building is not changed; and (C) the building code classification by type of construction of the building is not changed.*”

This item indicates that since fire protection systems are not structural elements of a building, that planning, designs, specifying and supervision of alterations and repairs are not required to be done and sealed by an engineer. Does the Board agree with this statement?

ANSWER: Awaiting OSBEELS response.