

Code Analysis – Response to Comments

Dover High School Athletic Facility Project

To: Jim Maxfield, Building Official

From: Joseph Persechino, PE
Neil Hansen, PE

Copy: Dover JBC
Eckman Construction

Date: May 6, 2026

RE: Response to Comments dated April 17th, 2026



We appreciate your review of the draft Code Plan (G-100) and the comments provided in your responses dated April 17, 2026. In response, we are submitting revised and stamped "Dunaway Field Area Code Plan" (Sheet G-100.1) and "Multi-use Field Area Code Plan" (Sheet G-100.2), last revised May 4, 2026, for your review.

The updated Code Plans reflect revisions made to address your comments and includes modifications to the egress layout, fencing and gate configurations, exit discharge paths, and clarification of code analysis assumptions.

The following provides a summary of and responses to each comment. Responses to comments received in the memo dated April 17, 2026 are in **bold**.

Comment 1

Comment:

"The draft plan G-100 appears to be an assembly (A-5) use in accordance with section 303.6 of the International Building Code, 2021 edition (IBC)."

Response:

Confirmed. The proposed athletic facility is classified as Group A-5 (Outdoor Assembly) in accordance with IBC §303.6. This classification is maintained in the revised and stamped Code and is reflected within the code summary and supporting analysis.

Inspection Services 4/17/26 Response:
Resolved.

Comment 2

Comment:

"To date, plans submitted for the overall complex are considered a draft and not an official plan as the plans are not stamped by a NH design professional. Due to this fact, communication regarding the project is informational only. However, Inspection Service will continue to answer questions as needed for a stamped plan to be submitted to this office as well as the FMO."

Response:

Acknowledged. The original submission was issued as a draft for preliminary code review and coordination. In response to this comment, we are submitting a revised and stamped Code Plan.

Inspection Services 4/17/26 Response:
Resolved.

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Comment 3

Comment:

"It is the understanding of this office the previous review performed by the FMO was limited to the accessory structures and not the overall complex. Once a final plan is created the FMO as well as this office will be required to perform a plan review prior to the issuance of a building permit."

Response:

Acknowledged. The design team understands that the prior FMO review was limited to the accessory structures. The revised and stamped submission includes the overall facility, and we will coordinate with the State Fire Marshal's Office to facilitate their review of the entire project for compliance with the NH State Fire Code.

Inspection Services 4/17/26 Response:

Resolved.

Comment 4

Comment:

"It is not clear from the plans if the two fields will be used simultaneously. The occupant load appears to assume that they will not be used at the same time. Please clarify."

Response:

The design assumes that the Dunaway Field and Multi-Use Field will not be utilized at peak occupancy simultaneously. The maximum occupant load calculations are based on this non-concurrent use condition. This assumption is now clarified on the revised Code Plan.

Inspection Services 4/17/26 Response:

Resolved.

Comment 5

Comment:

"Plan G-100 references section 1004.7 of the IBC which is for outdoor areas for yards, patios, occupied roofs, courts and similar outdoor areas. Based on discussion with the FMO it is currently the opinion of this office this section is not applicable to a sports complex. Please use other means to determine the occupant load."

Response:

The occupant load calculations have been revised to be based on IBC Table 1004.5.

As outdoor athletic field-of-play areas are not explicitly defined within Table 1004.5, the closest comparable occupancy classifications were determined to be "Exercise Rooms" or "Skating Rinks, Swimming Pools," which utilize an occupant load factor of 50 gross square feet per occupant.

Based on this approach, the revised occupant loads are as follows:

- Dunaway Field: 3,018 occupants
- Multi-Use Field: 2,205 occupants

These updated values have been incorporated into the revised Code Plan (Sheet G-100, dated March 30, 2026).

Inspection Services 4/17/26 Response:

Resolved.

Code Analysis Narrative

Comment 6

Comment:

"Plan G-100 shall indicate the planned storage use under the bleachers and grandstands. Please be aware of section 1030.11.1 of the IBC for spaces under bleachers and grandstands, which shall be separated by fire barriers not less than 1 hour fire resistive construction with a few exceptions."

Response:

The revised Code Plan has been updated to clarify that no storage of combustible materials shall be allowed beneath the bleachers or grandstands.

Inspection Services 4/17/26 Response:

"Indicate management of compliance, possibly add signage"

Follow-up Response:

The plans have been revised to include "NOTICE NO STORAGE OF HAZARDOUS OR FLAMMABLE MATERIALS" signs to be placed at all access gates to below the bleachers. This has also been noted on the revised code plans.

Comment 7

Comment:

"Plan G-100 visitor bleachers, shall have a minimum of two means of egress in accordance with the minimum requirements of section 404.1 of ICC 300. Currently only one exists."

Response:

The site design has been revised by removing the previously constrained egress condition at the rear of the track and reconfiguring the fencing and gate layout to provide direct egress paths from the visitor bleachers to the public way in both directions, free of obstructions. These revisions improve exit access and clarify that occupants are not dependent on a single discharge path from the bleachers; therefore, two means of egress from the bleachers have been provided. The revised gate locations and egress paths are reflected on the updated and stamped Code Plan.

Inspection Services 4/17/26 Response:

"Plans shall indicate a minimum of 2 means of egress from visitor bleachers and indicate pedestrian path (exit discharge to public way). The revised stamped plan altering fence configuration creates access to visitor bleachers from both sides of track. It is unclear how event ticketed access will be managed. The code consideration is to ensure no portable tables/booths etc is located within the exit discharge pathways. The double gate adjacent to the equipment fence shall be identified as an egress gate similar to DFG- 04, 05, 06 etc. Plans to indicate location of ambulance parking for sport events."

Follow-up Response:

- **The second egress access path from the visitor bleachers has been called out on the plan.**
- **All ticketing will take place at the ticket window located at the new concession building. The pedestrian pathways to the visitor bleachers will be staffed to check tickets, but no ticket sales will be located within the exit discharge pathways.**
- **The double gate adjacent to the storage building has been identified as an egress gate.**
- **The ambulance parking area has been noted on the Code Plan.**

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Comment 8

Comment:

"Plan G-100 does not appear to provide adequate common path of travel in accordance with the minimum requirements of section 1030.8 exception 2 of the IBC."

Response:

Stamped bleacher plans prepared by the manufacturer as part of the delegated design are being submitted as part of the individual building permits for each structure.

Inspection Services 4/17/26 Response:

Resolved.

Comment 9

Comment:

"Plan G-100 exit access travel distance shall be in accordance with section 1030.7. In addition, the path of egress travel shall be in accordance with section 407 of ICC-300 Standard on Bleachers, Folding and Telescopic Seating, and Grandstands, 2017 edition."

Response:

Stamped bleacher plans prepared by the manufacturer as part of the delegated design are being submitted as part of the individual building permits for each structure.

Inspection Services 4/17/26 Response:

Resolved.

Comment 10

Comment:

"Plan G-100 does not appear to indicate the type of gate hardware. Provide a plan detail with panic hardware where the occupant load is greater than 50 in accordance with Chapter 10 of IBC."

Response:

Acknowledged. A note has been added to the revised and stamped Code Plan indicating that, in lieu of panic hardware, all required egress gates will be under constant immediate supervision while the public is present. Thus, panic hardware for egress gates is not proposed or required per IBC §1010.4.1.

Inspection Services 4/17/26 Response:

"Submitted plans do not indicate how compliance with IBC and NFPA 101 will be ensured (i.e. trained crowd managers) This has been discussed since 8/25 and is unlikely to be achieved based on months of information provided."

Follow-up Response:

Panic hardware has been proposed out for all egress gates.

Comment 11

Comment:

"Plan G-100 appears to be using the fenced in area between the baseball outfield fence and home bleachers looping around the track radius as a safe dispersal area. This area is also a fenced in area requiring adequate egress and is not considered a safe dispersal area. Also, refer to section 1010.4.1 of IBC requiring safe dispersal areas to be located less than 50 feet from the enclosed space. The safe dispersal area would appear to be located outside of all fenced in areas near the rear access road of DHS and the gate near the parking area near

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the two dumpsters. Consider section 1028.5 of IBC when providing exit discharge that is direct and unobstructed to a public way."

Response:

The revised Code Plan no longer identifies the central fenced area as a "Safe Dispersal Area." All egress paths are now shown to discharge to public ways, as defined by the IBC. The updated and stamped Code Plan reflects these revisions.

Inspection Services 4/17/26 Response:
Resolved.

Comment 12

Comment:

"The location of the equipment structure may need to be relocated to accommodate adequate means of egress from the visitor bleachers as well as the field due to the 5' wide pinch point and overall occupant load. There was also a conversation with Eckman and myself to discuss options for exiting the field and adding exit discharge along the rear of the facility equipment building."

Response:

The site layout has been revised to address the identified pinch point and improve egress from both the visitor bleachers and field areas. Adjustments to the fencing, gate layout, and adjacent site elements have been made to provide compliant egress widths and eliminate constrained conditions. The revised configuration is reflected on the updated and stamped Code Plan.

Inspection Services 4/17/26 Response:
Resolved.

Comment 13

Comment:

"The review of the draft plan was limited to the IBC and ICC-300, no consideration of NFPA 101, Life Safety Code, 2021 edition or other codes have been performed at this time."

Response:

Acknowledged.

Inspection Services 4/17/26 Response:
Resolved.

Comment 14

Comment:

"Plan G-100 appears to indicate that the athletic facility can accommodate 1200 persons based on the current bathroom facilities with an occupant load of much more. Code language will need to be provided to clarify the overall fixture count."

Response:

The Code Plan has been updated to clarify plumbing fixture requirements and capacity. Permanent restroom facilities support events up to approximately 1,250 occupants. For events exceeding this capacity, temporary toilet facilities will be provided in accordance with IPC Table 403.1. The requirements for temporary toilet facilities have been noted on the stamped Code Plan.

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Inspection Services 4/17/26 Response:

"Remains open 4/17/26. Additionally the maximum travel distance to restrooms is 500'(travel distance exceeded at baseball viewing and football visitor seating. The district informed Planning that the restrooms in the school are not to be used, revise plan accordingly. Provide a location for the portable toilets for a special event on the stamped plan."

Follow-up Response:

The design team acknowledges that the permanent plumbing fixture counts associated with the facility do not fully satisfy the theoretical maximum occupant load when calculated strictly in accordance with IPC Table 403.1.

However, per Sections 104.10 & 104.11 of the 2021 IBC with New Hampshire amendments and Section 105.1 & 105.2 of the 2021 International Plumbing Code with New Hampshire amendments, where there are practical difficulties in carrying out the provisions of this code, the code official shall have the authority to grant modifications provided that the code official shall first find that the special individual reason makes the strict letter of this code impractical and the modification conforms to the intent and purpose of this code. The proposed use of the facility is event-based and not continuously occupied at peak capacity, with typical daily use supported by the permanent restroom facilities being proposed.

Following the strict letter of the code is impractical due to the limited number of events per year that would require the full allotment of fixtures. The proposed permanent fixture count meets the required number of fixtures for an occupancy of 1200, which exceeds the expected attendance for the majority of events. The modification also conforms to the intent and purpose of this code by providing temporary toilet facilities for larger events where attendance is anticipated to exceed the capacity supported by permanent fixtures. The school will provide temporary toilet facilities in accordance with IPC Table 403.1 fixture ratios as noted on the "Dunaway Field Area Code Plan" (Sheet G-100.1), last revised May 4, 2026. This operational approach ensures that adequate sanitary facilities are provided during peak demand conditions while maintaining an appropriate and practical level of permanent infrastructure for typical use, consistent with the intent of the code.

The viewing area along the third base side of the baseball field has been removed, and a location for portable toilets within 500' of the visitor bleachers is proposed for larger events where the visitor bleachers will be in use.

Additionally, the bathroom within the concession area will be removed in order to comply with IPC 403.3.2.

We appreciate your time and continued coordination on this project. The design team has incorporated the revisions outlined above into the enclosed stamped Code Plan and looks forward to your review. We would welcome the opportunity to meet and review the updated egress strategy with you and the State Fire Marshal's Office if helpful. Please do not hesitate to contact us with any questions or if additional information is needed to support your review.

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