

Agenda Report

June 23, 2025

TO: Honorable Mayor and City Council

FROM: Fire Department

**SUBJECT: PASADENA MUNICIPAL CODE §14.28.200 REQUIRING FIRE
SPRINKLER INSTALLATION IN ALL NEW CONSTRUCTION**

RECOMMENDATION:

It is recommended that the City Council:

1. Find that the proposed action is exempt from the California Environmental Quality Act (CEQA) in accordance with Section 15061(b)(3), the Common-Sense Exemption, which states that CEQA only applies to projects that may have an effect on the environment; and
2. Take no action to amend Pasadena Municipal Code §14.28.200, which requires fire sprinkler installation in all new construction, including temporary classroom trailers, for the protection of students and to enhance public safety.

BACKGROUND:

On April 4, 2025, after the Eaton Fire, Saint Mark's School (Saint Mark's), a private educational institution in Altadena, temporarily relocated to the EF Academy campus in Pasadena at 1505 E. Howard Street. Saint Mark's currently utilizes 15 modular trailers and auxiliary buildings as classrooms, restrooms, and offices for administrative staff, totaling 13,920 square feet. A Temporary Use Permit (TUP2025-00001) was approved on January 27, 2025. Related building and fire alarm permits were subsequently issued between March and April 2025.

On March 25, 2025, Saint Mark's was formally notified of the requirement to install fire sprinkler and alarm systems for its new temporary campus in accordance with Pasadena Municipal Code (PMC) §14.28.200 and §14.28.250 and the California Fire Code (CFC). These systems were to be completed prior to the start of the 2025 Fall

semester and are expressly listed as conditions of the Temporary Certificate of Occupancy (TCO) issued on April 2, 2025. Saint Mark's was directly informed of the fire sprinkler requirements pursuant to PMC §14.28.200.

Ordinance No. 7407 was approved and adopted by the City Council on December 5, 2022. This Ordinance added sections to the Pasadena Municipal Code (PMC) that incorporated specific provisions of the 2022 California Fire and Building Codes, making certain building, fire, and life safety standards, and other related model codes, applicable in the City.

PMC §14.28.200 mandates that "all new construction shall be provided with an approved automatic fire sprinkler system throughout the building," regardless of building size or occupancy classification. This requirement applies to all new buildings, including temporary modular classrooms. Surrounding agencies, including South Pasadena, Arcadia, San Gabriel, Glendale, Burbank and San Marino have adopted similar local fire codes mandating all new construction to be provided with approved automatic fire sprinkler systems.

As a private institution, Saint Mark's falls under local fire authority jurisdiction and must comply with PMC and CFC standards. Per CFC §903.2.3, any Group E occupancy exceeding 12,000 square feet, serving over 300 occupants, or placed on levels above the discharge level must be protected by a fire sprinkler system. California Building Code defines Group E occupancies as buildings or portions of buildings used for educational purposes through the 12th grade, where six or more people are present at any one time. Saint Mark's temporary site meets these thresholds. While certain exceptions exist, they do not apply to educational occupancies of this scale or function.

Saint Mark's has requested to be exempt from PMC §14.28.200. Certain sections of the CFC provide exemptions for public school construction projects and public school temporary relocatables. (CFC §903.2.19 (public school construction projects) and CFC §903.2.20 (temporary public-school relocatable)). However, as a private institution, these exemptions do not apply to Saint Mark's. These exemptions are limited to public K-12 facilities that receive state funding through the Leroy F. Greene School Facilities Act, and which fall under the jurisdiction of the Division of the State Architect (DSA) of the Office of Public School Construction (OPSC). DSA provides design and construction oversight for public K-12 schools, community colleges, and other state-owned and state-leased facilities to ensure that all such construction complies with fire and life safety codes. Saint Mark's is not subject to DSA's oversight. Instead, fire and life safety requirements for Saint Mark's are under the jurisdiction of the City's PMC.

Amending PMC §14.28.200 to allow Saint Mark's School to operate its temporary facilities without the required automatic fire sprinklers would increase fire safety risk, potentially compromising emergency response efforts. Unlike public school facilities that are built under DSA's oversight to ensure fire and life safety, Saint Mark's was only required to comply with the PMC. For this reason, staff recommends that the City Council take no action to amend the PMC and affirm that Saint Mark's is required to

install automatic fire sprinkler in accordance with the condition of the Temporary Certificate of Occupancy Saint Mark's has been operating under since April 2, 2025.

City staff across the Planning Department, the Department of Water and Power, and the Fire Department, have worked closely with Saint Mark's to successfully relocate them from Altadena to their temporary campus in Pasadena. Among other things, the City brought onboard a former Fire Marshal & Building Official who provided professional guidance in developing a project that met minimum fire and life safety requirements for a TCO, which accommodated St Mark's time and budgetary constraints. That TCO include a condition to fully comply with all applicable codes before the new school year. Staff also provided an expedited plan review, which included same-day plan reviews on nights and weekend. Although minimum fire and life safety requirements were met for the purposes of a TCO, significant code deficiencies remain, including non-compliant accessibility and an unpermitted playground.

COUNCIL POLICY CONSIDERATION:

Taking no action to amend Pasadena Municipal Code §14.28.200 supports the City Council's strategic goals to ensure public safety.

ENVIRONMENTAL ANALYSIS:

The proposed action is categorically exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15061 (b)(3), the common sense exemption.

FISCAL IMPACT:

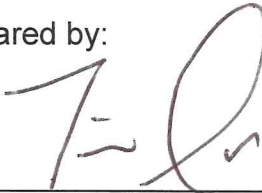
There is no fiscal impact as a result of not amending Pasadena Municipal Code §14.28.200.

Respectfully submitted,



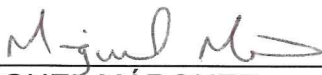
CHAD AUGUSTIN
Fire Chief
Pasadena Fire Department

Prepared by:



Timothy Sell
Deputy Fire Chief / Fire Marshal
Pasadena Fire Department

Approved by:



MIGUEL MÁRQUEZ
City Manager