STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED MARCH 18, 2008
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: MAY 12, 2008

Date: April 23, 2008

From: Robert E. Wallace
Name (Print or Type)

Concrete Promotion Council of Northern California
Agency, jurisdiction, chapter, company, association, individual, etc.

Street	City	State	Zip
6966 Sunrise Blvd #329	Citrus Heights	CA	95610

I/We ☒ (do) ☐ (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 707.14.1

and request that this section or reference provision be recommended:

☒ Approved ☐ Disapproved ☐ Held for Further Study ☐ Approved as Amended

by the proposing state agency.

Suggested Revisions to the Text of the Regulations:

Reason: [The reason should be concise. If the request is for "Disapproval," "Further Study," or "Approve As Amend", identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Although the Building, Fire, and Other Code Advisory Committee (CAC) recommended disapproval of Exception 4, we support the CSFM's position that this Exception should be approved and incorporated into the 2007 California Building Code. We agree with the additional rationale included in the Initial Statement of Reasons in response to the disapproval recommendation of the CAC. Certainly, Group I-2 occupancies should be included in the exemption from Exception 4 since they have already been incorporated into the 2007 Supplement to the International Codes and will become part of the 2009 International Building Code. So as a minimum, Group I-2 occupancies should be retained in the list of occupancies being included in Exception 4 as not being those allowed to utilize the automatic sprinkler system trade-off for the required enclosed elevator lobby. Furthermore, these occupancies are the more life-safety sensitive occupancies where it is very important that smoke migration from floor to floor not be allowed to occur through the elevator hoistways. It is well documented that significant quantities of smoke can still be generated during a sprinklered fire. And, of course, there is always a possibility that the sprinkler system may not be operational, especially after a seismic event of any significance. It has also been well documented by the National Fire Protection Association (NFPA) that automatic sprinkler systems are only 90% effective. So there is a 1 in 10 chance that a fire significant enough to operate the automatic sprinkler system may occur in one of these

occupancies and the sprinkler system may not be adequate or may not respond as designed to control the fire, thus allowing significant quantities of hot smoke to be generated. Such smoke could potentially move vertically through the building via the elevator hoistways unless the enclosed elevator lobbies are provided as specified in Section 707.14.1.

Regarding the proposed amendment to Exception 6 which excludes the Group I-2 occupancies from the option of using elevator hoistway pressurization in lieu of the required enclosed elevator lobbies, we also support that amendment. We believe that the pressurization of elevator hoistways is problematic and is certainly not desirable in Group I-2 occupancies. The pressurization system may drive dust and other contaminants within the air stream used to pressurize the elevator shafts into the building into areas where it may be very detrimental to the patients. Furthermore, in these type occupancies the patients will most likely remain in place and/or be relocated to an adjacent smoke zone on the same story where they will remain until they can be rescued and evacuated or moved to another safe location by the responding fire department. In such cases it is more desirable to rely on a passive type elevator lobby enclosure protection system rather than an active type air pressurization system for the elevator hoistways.