STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

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 30, 2008

From: William J. Hall
Name (Print or Type)

Portland Cement Association
Agency, jurisdiction, chapter, company, association, individual, etc.

7223 Cold Cove	Mechanicsville	VA	23111
Street	City	State	Zip

I/We ☒ (do) ☐ (do not) agree with:

The Agency proposed modifications As Submitted on Section No. Table 503

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

We agree with the CSFM's rationale contained in the Initial Statement of Reasons for the proposed amendment. Those Group I-1 occupancies containing residential care facilities for the elderly (RCFE) where there are more than six bed-ridden (non-ambulatory) occupants should not be allowed in certain types of construction that have no built-in fire-resistive protection of the structural elements or the floors that separate the stories within the building in order to provide for the ability to defend in place until rescued. Furthermore, these facilities should not be allowed above two stories in buildings using combustible construction. Nor should they be allowed above two stories in buildings of noncombustible construction unless they are a minimum Type IB construction which requires the floors to have a minimum 2-hour fire-resistance rating. This provides sufficient passive fire-resistive protection against the spread of fire from floor to floor which is reasonable to allow these occupants above the second story where rescue and evacuation will become more difficult. And it may become necessary for the occupants to remain in place for a considerable length of time until they can be rescued and evacuated by the responding fire department.