

However, a detailed analysis of Table 5-A of the 2001 CBC for State Fire Marshal regulated occupancies clearly indicates that virtually all fire-resistance rated exterior bearing walls were required to maintain not less than a 1-hour fire-resistance rating regardless of the fire separation distance for all types of construction where exterior bearing walls were required to have at least a 1-hour fire-resistance rating. This would be equivalent to all the types of construction in the 2007 CBC with the exception of Types IIB and VB construction. For those types of construction the exterior bearing walls have no required fire-resistance ratings, as was the case for the comparable types of construction in the 2001 CBC which were designated as Types II-N and V-N.

Fire-resistance rated exterior nonbearing walls of the State Fire Marshal regulated occupancies, for virtually all such occupancies for all construction types other than Types II-N and V-N construction in the 2001 CBC (which are equivalent to Types IIB and VB construction in the 2007 CBC), were required to maintain their fire-resistance rating of 1-hour or greater for a maximum fire separation distance of 40 feet. It should also be noted that for Type V-One Hour construction in the 2001 CBC (which is equivalent to Type VA construction in the 2007 CBC) the minimum 1-hour fire-resistance rating was required to be maintained regardless of the fire separation distance. However, fire-resistance rated exterior nonbearing walls of the State Fire Marshal regulated occupancies, in the vast majority of cases for all construction types other than Types IIB and VB construction in the 2007 CBC (which are equivalent to Types II-N and V-N construction in the 2001 CBC) are required to maintain their fire-resistance rating of 1-hour or greater for a maximum fire separation distance of only 30 feet. It should be noted under the 2007 CBC, exterior nonbearing walls are not required to have a fire-resistance rating regardless of construction type once the fire separation distance exceeds 30 feet according to Table 602.

Furthermore, in accordance with Table 602 for a fire separation distance of 10 feet to 30 feet only Types IIB and VB construction do not require a minimum 1-hour fire-resistance rating except for Group H occupancies. Similarly, in Table 5-A of the 2001 CBC the comparable types of construction designated as Type II-N and V-N do not require a minimum 1-hour fire-resistance rating once the fire separation distance is greater than the following:

Group A occupancies	20 feet
Group E occupancies	10 feet
Group H-1 occupancies	75 feet
Group H-2/H-3/H-4/H-6/H-7 occupancies	20 feet
Group H-5	60 feet
Group I occupancies	not permitted
Group R-1 occupancies	5 feet

So based on this analysis, the proposed amendment actually makes the 2007 CBC less restrictive than the 2001 CBC for bearing walls and for the vast majority of exterior nonbearing walls which are required to have a minimum 1-hour fire-resistance rating. Since the 2001 CBC required all fire-resistance rated exterior walls to be tested for fire exposure from both sides regardless of fire separation distance, we believe that this proposed amendment would reduce the level of fire protection provided to the exterior walls of buildings under the 2007 CBC and should, therefore, be disapproved.