

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: May 10, 2008

From: Randy Squires, President/Owner
Name (Print or type)

Partition Specialties, Inc.
Agency, jurisdiction, chapter, company, association, individual, etc.

714 C Street, Suite #3 San Rafael CA 94901
Street City State Zip

I/We (do) (do not) agree with:

The Agency proposed modifications As Submitted on Section No. 707.14.1, Exception 4 by CA SFM and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

to the proposing state agency.

Suggested Revisions to the Text of the Regulations:

No revisions suggested to CA SFM proposed amendments to Exception 4 of 707.14.1

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.]

I am the President and owner of Partition Specialties, Inc., a California based specialty contractor (license # 763121) and a resident of California for 19 years.

We have been selling and installing elevator smoke containment systems throughout California since 1995. Over the past 13 years, we have managed to build a \$20M division around these products and currently employ 25 full-time employees in the areas of sales, marketing, administration and installation. We take great pride in knowing that the use of our products contributes significantly to mitigating vertical smoke migration in both commercial and residential buildings – a very real danger for building occupants.

While we are strong supporters of sprinkler systems in buildings, we have come to understand that unprotected openings do very little to prevent smoke from migrating off the floor of origin in fully sprinklered buildings. In fact, there is ample evidence of smoke movement from floor to floor in sprinklered buildings further endangering building occupants during an emergency.

As a business owner, employer and resident I have a vested interest in seeing high levels of smoke protection maintained within California. I have always applauded California's leadership role in smoke free buildings, fuel economy standards, environmental issues, accessibility requirements and numerous other consumer and citizen related issues. I therefore strongly encourage the Building Standards Commission and State of California to support the proposed amendment to the 2007 CBC Section 707.14.1 by the State Fire Marshall, the very organization tasked with regulating building safety.

As written this proposal will not add additional cost to building construction or maintenance as it is similar in scope to the previous California Building Code. It will however allow California to once again provide national leadership in the area consumer and citizen safety in the establishment of strict standards related to elevator smoke control protection.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.