



May 26, 2011

PRESIDENT

RICHARD S. RENFRO, C.B.O.
CHIEF BUILDING OFFICIAL
CITY OF ELK GROVE

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833
cbsc@dgs.ca.gov

FIRST VICE PRESIDENT

BILL NAGEL, S.E., C.B.O.
BUILDING OFFICIAL &
ASST. DEVELOPMENT SERVICES DIRECTOR
CITY OF REDDING

Re: Response to NOTICE OF PROPOSED CHANGES TO THE
CALIFORNIA CODE OF REGULATIONS, TITLE 24

In accordance with the California Building Standards Administrative Code, Article 1-901(d), the California Building Officials (CALBO) State Code Committee submits the following comments for consideration.

SECOND VICE PRESIDENT

CRAIG R. OLIVER, C.B.O.
CHIEF BUILDING OFFICIAL
CITY OF MARINA

We request the State Agencies amend code change proposals as described below:

IMMEDIATE PAST PRESIDENT

DAN PAVAO, C.B.O.
BUILDING OFFICIAL / FIRE MARSHAL
CITY OF EL CAJON

1. (SFM) Building Code Section 705.2.3 – Recommend amend to reflect the original model code language.

DIRECTORS

GEORGE CHAVEZ, C.B.O.
CITY BUILDING OFFICIAL
CITY OF BEVERLY HILLS

As with the Building Standards Commission Code Advisory Committee, we believe the proposal is unjustified and unnecessary.

M. DAVID KHORRAM, P.E., C.B.O.

CHIEF BUILDING OFFICIAL
CITY OF ORANGE

We recommend the proposal be amended to return the exception to its original model code language. We believe the original model code language provides the best clarity, and accomplishes the SFM desire to eliminate the unintended "2 feet" reference.

BOB LATZ, C.B.O.

BUILDING SERVICES MANAGER
CITY OF OAKDALE

2. (SFM) Building and Fire Codes, Section 1011.3 – Recommend further study.

BRIAN H. LEE, AIA, AICP, C.B.O.

CHIEF BUILDING OFFICIAL
CITY OF WHITTIER

As with the Building Standards Commission Code Advisory Committee, we recommend the proposed amendment be studied

RAJ PATEL, P.E., C.B.O.

SUPERINTENDENT OF BUILDING
COUNTY OF LOS ANGELES

further. The SFM reason statement suggests that this is simply an editorial modification. While changes to visually sighted signs may be considered editorial, similar changes to tactile signage have potentially substantive impact. We therefore, believe this proposal be both reviewed and if deemed appropriate, brought forward by DSA-AC. If not correlated with DSA-AC, the proposed language may create confusion and potentially, a safety hazard for a non- or partially-sighted person. In order to ensure consistency with state accessibility standards, we therefore, recommend that this and similar accessibility related code amendments be brought forward by DSA.

3. (SFM) Residential Code, Section 314.4 exceptions 4 and 5 – Recommend editorial amendment.

While we believe the intent of these amendments are appropriate, we recommend the wording be consistent with the proposed HCD language in Section 315.1.3 exceptions 3 and 4.

The exceptions for smoke alarms and carbon monoxide alarms are the same and should therefore be written in the same format. We believe the proposed HCD language for section 315.1.3 exceptions 3 and 4 is more clear than that of the proposed SFM language for 314.4 exceptions 4 and 5. Ensuring this consistency is a primary function of the CBSC.

We appreciate and support the hard work of the Commission and the other State Agencies. In particular, we appreciate the ongoing effort to minimize changes to the model code documents. We respectfully request consideration of the modifications noted above.

Sincerely,

Stephan Kiefer, Chair
CALBO State Code Committee

CALBO State Code Committee:

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| Stephan Kiefer, City of Livermore | Rick Renfro, City of Elk Grove |
| Ali Fattah, City of San Diego | Vivian Day, City/County of San Francisco |
| Suzanne Kusik, City of Newport Beach | Dan Chudy, City of Riverside |
| Paul Armstrong, J.A.S. Pacific | Gale Bate, Code Resource |
| Dennis Bogle, City of Newport Beach | Dennis Lockard, Town of Atherton |

Cc: State Fire Marshal's Office
Attn: Kevin Reinertson