

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
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Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 31, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 15, 2012

Date: 10/15/2012

From: Joseph H. Cain, P.E.



Name (Print or type)

(Signature)

-- SolarCity Corporation, representing self

Agency, jurisdiction, chapter, company, association, individual, etc.

3055 Clearview Way

San Mateo

CA

94402

Street

City

State

Zip

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

do] The Agency proposed modifications As Submitted on Section No. 13.4

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

Suggested Revisions to the Text of the Regulations:

Section 13.4 NONSTRUCTURAL COMPONENT ANCHORAGE.

Components and their supports shall be attached (or anchored) to the structure in accordance with the requirements of this section and the attachment shall satisfy the requirements for the parent material as set forth elsewhere in this standard. Component attachments shall be bolted, welded, or otherwise positively fastened without consideration of frictional resistance produced by the effects of gravity. A continuous load path of sufficient strength and stiffness between the component and the supporting structure shall be provided. Local elements of the structure including connections shall be designed and constructed for the component forces where they control the design of the elements or their connections. The component forces shall be those determined in Section 13.3.1, except that modifications to Fp and R, due to anchorage conditions need not be considered. The design documents shall include sufficient information relating to the attachments to verify compliance with the requirements of this section

Exception: Ballasted photovoltaic systems when design is based on Section 13.4.7 and approved by the enforcing agency.

13.4.7. Solar PV panels or modules installed on a roof as a ballasted system need not be rigidly attached to the roof or supporting structure. Ballasted unattached systems shall be designed and installed only on roofs with slopes 1 inch per foot or less. The ballasted system shall be designed to resist sliding and uplift resulting from lateral and vertical forces, using a coefficient of friction determined by acceptable engineering practices. In sites where the Seismic Design category is C or above, the system shall be designed to accommodate seismic displacement determined by approved analysis or shake-table testing, using input motions consistent with ASCE 7 lateral and vertical seismic forces for non-structural components on roofs.

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

It is reasonable to restrict the application of ballasted systems that are unattached to a maximum roof pitch suggested by recent research. Ballasted systems that are partially attached should not be limited to the same 1 inch per foot or less roof pitch, as they can be designed to resist sliding by their anchorage system. Application by roof pitch should be based on engineering justification.

- (3) The public interest requires the adoption of the building standards.

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.