

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 AUGUST 31, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 15, 2012

Date: 10/15/12

From:

Matthew L. Mlakar
Name (Print or type)


(Signature)

Structural Engineers Association of California, Building Code Committee

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

3001 E Street
Street

Sacramento
City

CA
State

95816
Zip

We do not agree with:

The Agency proposed modifications As Submitted on Section No. 1603A.3

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:

1603A.3 Structural Calculations. The application for the approval of construction documents that involves structural elements or components shall be accompanied by complete and accurate structural design computations, which shall comply with requirements prescribed by the enforcement agency.

~~1. The computations shall be preceded by a detailed index.~~

~~2. The computations including each major subsection shall be prefaced by a statement clearly and concisely outlining the basis for the structural design and indicating the manner in which the structure will resist the vertical loads and lateral forces.~~

~~3. The computations shall be sufficiently complete to the extent that calculations for the individual structural members and connections can be readily interpreted.~~

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.]

The proposed changes do not meet Health and Safety Code §18930(a)(4) & §18930(a)(6) and we propose that they be modified as shown above because the proposed code language cannot be consistently and properly enforced as currently written. There is too much ambiguity within the listed items for this code provision to be consistently interpreted and applied by the structural engineer. Moreover, it is not the mandate of the code to dictate how a structural engineer organizes their calculations. If the state agencies, or more importantly the individual plan reviewer, require additional information or a more thorough explanation of the calculations from the structural engineer to determine whether the structural design is adequate, they already have the means to do so through their submittal check lists and the plan check process. Placing what will probably be a growing list of structural calculation requirements in the code will just make the whole approval process more arduous and confusing.

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.