

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: 10/12/12

From:

Rick Thornberry, PE
Name (Print or type) (Signature)

Representing: Air Movement and Control Association (AMCA)
Agency, jurisdiction, chapter, company, association, individual, etc.

3235 Soda Canyon Road Napa CA 94558
Street City State Zip

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

[] The State Fire Marshal proposed modifications As Submitted on Section No. 408.1.2.2 CBC

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:

None.

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.]

We are requesting Disapproval of this amendment based on Point (1) The proposed building standard does not conflict with, overlap, or duplicate other building standards, Point (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part and Point (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part. Our reason for this request follows.

Section 408.1.2.2 Intervening spaces

AMCA opposes this amendment as it is currently written and believes that it is not necessary and may actually conflict with other applicable code requirements such as those found in Section 1014.2 Intervening

Spaces. It appears to be based on the erroneous assumption as stated in the Initial Statement of Reasons (ISOR) that Table 1018.1 Corridor Fire-Resistance Rating requires corridors to be provided in Group I-3 occupancies where the occupant load is 6 or more persons. That is simply not the case. The table simply indicates what the required fire-resistance rating is for a corridor when it is provided. See the definition for “corridor” in Section 202. And there are no requirements in Section 408 that mandate corridors either. So current Section 1014.2 Intervening Spaces can currently be applied to Group I-3 occupancies without adding this proposed new subsection to Section 408.

The ISOR states that “detention grade glazing cannot be constructed to meet fire resistance requirements.” We agree, but Section 408.7 Security Glazing already addresses that issue and allows for security glazing to be used in 1-hour fire partitions, which are used to enclose fire-resistance rated corridors, under specified conditions.

The ISOR also states that Table 1018.1 already refers to Section 408.1.2.2 but it does not. It does refer to Section 408.8 but not 408.1.2.2. Yet the SFM amendment to the 2010 CBC that added Section 408.1.2.2 is being proposed to be deleted and this new amendment substituted which is completely different and only confuses the issue of the protection of corridors in Group I-3 occupancies.

And the three conditions listed in the proposed rewrite of Section 408.1.2.2 are very vague and unclear as to what they are or how they’re intended to be met in order to be considered “an intervening space.” They are not complete sentences as they lack verbs to indicate how they apply.

It should also be noted that the proposed revision to Footnote b to Table 1018.1 to add a reference to Section 408.1.2 should be deleted if this proposed amendment to Section 408.1.2.2 is disapproved unless it is intended to retain the current amendment to Section 408.1.2.2.

In conclusion, AMCA believes that this Section should be Disapproved for the reasons stated above.

