

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: cbsc@dgs.ca.gov

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. 408.9 and 408.9.1CBC

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 Further Study of these amendments based on 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 408.9 Windowless buildings/Section 408.9.1 Smoke Venting

AMCA has several concerns about the proposed amendment to Section 408.9 and the proposed new Section 408.9.1 which are intended to work together.

We are not opposed to deleting Use Condition 1 from the smoke control system requirement for windowless buildings since this use condition is the same as a Group R occupancy as there are no restraints or locked doors or windows. But we have reservations about deleting Use Condition 2 from the requirement.

We could agree to the deletion of Use Condition 2 if the overall travel distance to reach a door into an adjacent smoke compartment was limited to a maximum of 100 ft (half the 200 ft limit of travel required by Section 408.6.1 within a smoke compartment) where there is no access provided to a door into a different adjacent smoke compartment. Because the exterior doors are allowed to be locked to prevent unauthorized egress, if there is only one adjacent smoke compartment with an access door, the inmates located at the end of the building farthest from the smoke compartment will have to travel as much as 200 ft in the same direction (common path of travel) to reach a safe area. It should be noted that Table 1014.3 limits the common path of travel in a Group I-3 occupancy to 100 ft.

The wording in Section 408.9.1 is confusing and unclear as to what is intended. It appears that at least three different options are being allowed to the engineered smoke control system requirement as follows:

Windows or doors

Smoke vents

Equivalent means to provide a tenable environment for exiting from the smoke compartment in the area of fire origin

If that is the case, we would recommend that they be put in a numbered list, rather than in a string of words with lots of commas, to clarify what the options actually are.

If the one option for windows or doors is used, then the building would no longer be considered a windowless building, so that option appears to be superfluous and potentially confusing. Furthermore, the proposed text in the second sentence does not specify a minimum size, area, or dimension for the windows or a minimum separation distance between them. Also, it is not clear what the phrase “at or above the highest occupied level” means.

The smoke vent option is too vague since no design criteria are provided. Are these smoke vents intended to be the same as smoke and heat vents in Section 910?

The equivalent means option is also vague, especially considering the proposed new definition for “tenable environment.” It basically relies on the definition to set the design criteria. We also question if the phrase “to provide a tenable environment...” is intended to apply to all three options or just to the equivalent means option.

There should also be a statement to the effect that the equivalent means shall be demonstrated to be as reliable and effective as an engineered smoke control system.

However, we do have concerns about the two Exceptions to Section 408.9.1. In Exception 1 we are not clear as to what is a CDCR or a CDCR mental health housing facility. Also, no occupant load limit is specified to allow the use of this Exception. The occupant load limit should probably be consistent with that allowed for a space having only one exit or exit access doorway, i.e., 10 persons based on Table 1015.1 for a

Group I-3 occupancy. In Exception 2 there is a great deal of vagueness, ambiguity, and lack of clarity as to what it is intended to allow in lieu of an engineered smoke control system based on Section 909. What is “an acceptable safe egress time?” What are “untenable conditions?” What is the burden of proof? How reliable and effective must the engineering analysis be? We strongly oppose Exception 2 without a great deal more criteria and clarity being provided.

In conclusion, it is obvious to AMCA that, as a minimum, these sections should be Further Studied so that they can be clarified. If not, they should be Disapproved as amended.

