

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: Rick Thornberry, FPE
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. 408.12

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 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 408.12 Windows

This section appears to conflict with Section 408.7 Security Glazing. Section 408.7 already addresses one-hour corridor walls (since they are required to be constructed as one-hour fire partitions) and smoke barrier

walls.

Furthermore, Item 3 of this section contradicts the charging sentence which states that the area of glazing shall not be restricted, whereas Item 3 states that the area of glazing may not exceed 84 square feet. It should also be noted that Section 408.7 allows security glazing without area limits provided the individual glazed panels do not exceed 1,296 square inches (9 square feet) per panel.

There are also some typographical/editorial errors. For example, in Item 1 “rating” should be added after “fire-protection” and the hyphen in “fire-protection” should be deleted. Also, in Item 2 the period after “frames” should be deleted and the capital “S” in “Shall” should be changed to the small letter “s.” And in Item 3 the phrase “three-fourths-hour fire-resistive rating” should be changed to “minimum ¾ hour fire protection rating.”

In conclusion, we believe this new Section 408.12 should be Disapproved based on the reasons stated above.

