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October 8, 2012

Michael L. Nearman
Deputy Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Comments to the Proposed Building Standards of the SFM to CRC Title 24 Part 9
(California Fire Code)

Dear Mr. Nearman

When applying the Fire Code where two sections are in conflict we all understand that the most restrictive shall apply.

With that being said, please refer to the 2010 edition of California Fire Code section 507.5 **Fire hydrant systems** which states “Fire hydrant systems shall comply with sections 507.5.1 through 507.5.6 and Appendix C or by an approved method.”

Please see Appendix C, which according to the CALIFORNIA FIRE CODE-MATRIX TABLE APPENDIX C-FIRE HYDRANT LOCATIONS AND DISTRIBUTION “Adopt entire chapter SFM T-24”.

Appendix C does not allow for an approved method. Since it is the most restrictive, the approved method has been superseded by the appendix C and does not apply.

A conflict appears in **Section 507.5.1 Where required:** “Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more that **400** feet from a hydrant on approved fire apparatus access road..... Appendix C as adopted requires the average spacing of hydrants to be **500** feet. Again the most restrictive applies, so the language needs to be amended in one or the other to remove this conflict.

In **Section 507.5.1 Exception:** For Group R-3 and Group U occupancies equipped throughout with an approved automatic sprinkler system.... This distance required shall not be more than **600 feet**. Appendix C being the most restrictive does not address the exception therefore making the exception invalid. Is it the intent of the SFM to require fire hydrants to place fire hydrants on driveways within 500 feet of newly constructed homes on large parcels of 5, 10, 20 acres or larger when the driveway exceeds the 500 feet?

Solution: in our view the conflicts we have described can be solved in one of two ways:

- The SFM retract the adoption of Appendix C. in the 2013 California Fire Code. This would allow local jurisdictions to use the appendix as is, or amend the appendix to suit their local needs. For example in our rural areas we have amended Appendix C in the past prior to the SFM adoption of the table, to allow for fire hydrants to be placed 1000 feet apart in areas zoned 2 acres and larger. Appendix C as currently adopted does not allow for that amendment.

The SFM still has control of the number fire hydrants and their distribution in state and school facilities through their adoption of Appendix CC.

- The other alternative we offer is to amend Appendix C **section C101, General, C101 Scope** to read: Fire hydrants shall be provided in accordance with this appendix for the protection of buildings, or portions of building, hereafter constructed “**or as approved by the fire official.**” or similar wording.

An additional comment on Appendix C, C105.1 **Number and Distribution of Fire Hydrants.** The table allows for one hydrant when less than 1750 gallons or less is the required fire flow. Standard dry barrel hydrants are listed to provide 1000 gallons per minute. Therefore, with a minimum fire flow of 1500 gallons per minute as required by Appendix C, a minimum of 2 hydrants are required so that the listing of the hydrant is not exceeded.

Other comments:

Section 1004.1.1.1 Intervening Spaces – Remove the proposed language “assigned individually for each area and considered. Leave existing language “...be based on the cumulative occupants loads of all rooms, areas or spaces to that point along the path of egress travel”. We believe the proposed language says the same as what is currently in code but not as clearly stated. Section 1004.1.1.1 deals with occupant load. Section 1014.2 deals with the path of exit travel.

I truly hope our comments have been helpful, if you have any questions please contact me.

Sincerely,

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