



**INDUSTRIAL  
ENVIRONMENTAL  
ASSOCIATION**

*Leaders of Environmental Responsibility*

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CALIFORNIA BUILDING  
STANDARDS COMMISSION

Ms. Rosario Marin, Chair  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA 95833

**Re: Express Terms Proposed Building Standards of the Office of the State Fire Marshall  
2007 California Fire Code, California Code of Regulations Title 24, Part 9**

Dear Chair Marin:

The Industrial Environmental Association (IEA) is writing in support of the aforementioned Express Terms being proposed by the State Fire Marshall (SFM) to be included in Section 443 of the 2007 California Building Code. In this section of the Code, the L-Occupancy provides important controls and safety provisions for any research and development laboratory containing hazardous materials in the State of California. The L-Occupancy is critical to the on-going growth and development of the biotechnology industry in California.

The biotechnology industry is a quickly-evolving industry that requires a broad range of biological and chemical work to be performed in a laboratory environment. These facilities are best located in proximity to major research institutions such as the University of California San Diego (UCSD). Researchers at educational institutions like UCSD are also performing similar type of experimental activities. Therefore, clarifying and codifying the L-Occupancy in the 2007 California Building Code for use by any such research and development laboratory will ensure that all such facilities be developed with the same controls and safety provisions.

Credible parties who we have worked on this issue extensively believe that the SFM has the authority to propose these code amendments as described in the California Health and Safety Code Section 18949.2(b). The state is well served by the work that the SFM has done in ensuring that all laboratory facilities throughout the State of California are built to the same safe standards.

IEA supports the extensive and inclusive process created by the SFM's Office in the development of the L-Occupancy. It has been a very positive, constructive process that has addressed all the issues and included representatives by industry and regulatory organizations from across the state. We want to thank the State Fire Marshall Kate Dargan, Chief Tony Hoover, and their staff for their leadership in this important endeavor.

We wholeheartedly endorse these Express Terms as they serve to clarify the requirements for any research and development laboratory and to enhance the safety measures and controls that will ensure safe operations. We urge your adoption of the Express Terms as submitted.

Sincerely,

Patti Krebs  
Executive Director

