

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Christina F. Francis
Date: Monday, October 18, 2021 8:23:40 PM

Commenter Contact Information

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Proposed Building Standard

Title 24 Part #: Part 9
Section #: 322.4.2.3
Proposing State Agency: SFM
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

Item 3-7

Amend Section 322.4.2.3 to provide clarity to the requirements for storage areas not exceeding 30% SOC by adding "except for storage areas meeting the requirements of 322.4.2.6. "

322.4.2.3 Fire protection systems. Indoor storage areas for lithium-ion and lithium metal batteries shall be protected by an automatic sprinkler system complying with Section 903.3.1.1 or an approved alternative fire suppression system. The system design shall be based on recommendations in the approved technical opinion and report required by Section 322.4.2.1 except for storage areas meeting the requirements of 322.4.2.6

Reasoning:

Section 322.4.2.6 exempts Sections 322.4.2.1 (technical opinion and report), however, as written Section 322.4.2.1 requires a technical opinion and report without exception. The amended language will allow for the exemption for storage not exceeding 30% meeting 322.4.2.6. The intended design will be aligned with Chapter 32 of the CFC.

9 Point Criteria Info:
18930(a) 3