

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 5:36:10 PM

Commenter Contact Information

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Proposed Building Standard

Title 24 Part #: Part 9
Section #: 322.4.2.4
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.

Amend section 322.4.2.4 as noted to allow for other detection methods and alternatives for constantly attended locations:

322.4.2.4 Fire alarm systems. Indoor storage areas for lithium-ion and lithium metal batteries shall be provided with an approved automatic fire detection and alarm system complying with Section 907. The fire detection system shall use air-aspirating smoke detection, radiant energy-sensing fire detection, or other suitable automatic detection means.

Exemption: For storage areas that are continuously occupied, automatic fire detection is not required where manual pull stations are provided throughout the storage area.

Reasoning:

- 1) "or other suitable automatic detection means" - this allows other suitable detection for storage areas to be considered by AHJ/owner to meet the intent of detection coverage.
- 2) Exception for continuous operation - for areas that may have constant occupancy, this provides an option for early detection by occupants.

9 Point Criteria Info:
18930(a) 3