

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 6:09:58 PM

Commenter Contact Information

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Proposed Building Standard

Title 24 Part #: Part 9
Section #: 322.4.3
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

Add Exception to 322.4.3 for outdoor storage areas under weather protection and properly protected by sprinkler protection.

322.4.3 Outdoor Storage. Outdoor storage of lithium-ion or lithium metal batteries shall comply with Sections 322.4.3.1 through 322.4.3.3.

Exception: Outdoor storage areas for lithium-ion or lithium metal batteries under weather protection and fully protected by sprinklers shall not be required to comply with Sections 322.4.3.1 and 322.4.3.2. The system design shall be based on recommendations in the approved technical opinion report required by Section 322.4.2.1 for batteries with SOC exceeding 30%.

Reasoning:

Sections 322.4.3.1 and 322.4.3.2 provides the safeguarding requirement for outdoor storage without sprinkler protection. For areas where sprinkler coverage is provided, Sections 322.4.3.1 and 322.4.3.2 should not be applicable. Sprinkler protection design should be applied as noted in other

sections for inside storage of batteries - this provides consistency to the sprinklered storage area requirements.

9 Point Criteria Info:

18930(a) 3