

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Christina Francis  
**Date:** Monday, October 18, 2021 5:46:15 PM

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Commenter Contact Information

Name: Christina Francis  
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Proposed Building Standard

Title 24 Part #: Part 9  
Section #: 322.4.3.3  
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.

Amend 322.4.3.3 to allow other suitable detection options for exterior storage by adding "or other suitable fire detection means" . Wording to be as follows:

322.4.3.3 Fire detection. Outdoor storage areas for lithium-ion or lithium metal batteries, regardless of whether such areas are open, under weather protection or in a prefabricated portable structure, shall be provided with an approved automatic fire detection and alarm system complying with Section 907. The fire detection system shall use radiant energy-sensing fire detection or other suitable fire detection means.

Reasoning: This change allows for additional suitable fire detection options for outside storage of batteries.

9 Point Criteria Info:

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