



California Building
Industry Association

1215 K Street
Suite 1200
Sacramento, CA 95814
916/443-7933
fax 916/443-1960
www.cbia.org

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March 31, 2014

Edith Hannigan
Board Consultant
CAL FIRE
PO Box 944246
Sacramento, CA 94244-2460

RE: Proposed SRA Fire Safe Regulations (Title 14, Sections 1270-1276)

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member-companies involved in residential and light-commercial construction. CBIA member companies are responsible for over 90% of the new single-family dwellings constructed in California each year.

With regards to CAL FIRE's Proposed SRA Fire Safe Regulations, CBIA submits the following written comments to supplement our verbal testimony presented at the February 24th Workshop on this subject.

Section 1270.02 Scope:

It needs to be clarified in the scoping provisions that these amendments "*will not apply to existing structures, roads, streets and private lanes or facilities*". While this intent was confirmed in your February 10th email to me, there needs to be some restatement of this intent in the body of the regulations. Given the formatting of Section 1270.02 Scope, that would seem to be the appropriate place for such a clarification.

Sections 1273-1276:

With regards to the specific requirements for each of the individual subsections, we would once again suggest the inclusion of the "generic alternative" which allows for "Other acceptable method of compliance as approved by the local fire agency or AHJ (authority having jurisdiction)".

Recognizing that there is a multitude of differing site issues which the state cannot be expected to address with a one-size-fits-all regulation, this alternative method of compliance is allowed throughout California's Green Building Standards and has proved instrumental in keeping compliance costs down while maintaining the goals of the state.

Sincerely,

Robert E. Raymer, PE
Senior Engineer/Technical Director