

**15-DAY COMMENT PERIOD
MODIFICATIONS TO EXPRESS TERMS
FOR
PROPOSED BUILDING STANDARDS
OF THE
OFFICE OF THE STATE FIRE MARSHAL
REGARDING THE 2010 CALIFORNIA RESIDENTIAL CODE
CALIFORNIA CODE OF REGULATIONS TITLE 24, PART 2.5
2010 ANNUAL RULEMAKING CYCLE**

Legend for Express Terms:

1. **Amended, adopted or repealed language for the 15-day public comment:** Amended, adopted, or repealed language will appear in double underline and ~~double-strikeout~~.
 2. **California amendments that remove IRC language:** Shown as ~~double-strikeout~~.
 3. **Notation:** Authority and Reference citations are provided at the end of each chapter or Section.
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PROPOSED MODIFICATIONS AND RATIONALE:

R314.4 Power source. *Smoke alarms shall receive their primary power from the building wiring provided that such wiring is served from a commercial source and shall be equipped with a battery backup. Smoke alarms with integral strobes that are not equipped with battery backup shall be connected to an emergency electrical system. Smoke alarms shall emit a signal when the batteries are low. Wiring shall be permanent and without a disconnecting switch other than as required for overcurrent protection.*

Exceptions:

1. *Smoke alarms are permitted to be solely battery operated in existing buildings where no construction is taking place.*
2. *Smoke alarms are permitted to be solely battery operated in buildings that are not served from a commercial power source.*
3. *Smoke alarms are permitted to be solely battery operated in existing areas of buildings undergoing alterations or repairs that do not result in the removal of interior walls or ceiling finishes exposing the structure, unless there is an attic, crawl space or basement available which could provide access for building wiring without the removal of interior finishes.*
4. ~~*Work involving Smoke alarms are permitted to be solely battery operated where repairs or alterations are limited to the exterior surfaces of dwellings, such as the replacement of roofing or siding, or the addition or replacement of windows or doors, or the addition of a porch or deck, are exempt from the requirements of this section.*~~
5. ~~*Smoke alarms are permitted to be solely battery operated when work is limited to the installation, alteration or repairs of plumbing or mechanical systems are exempt from the requirements of this section or the installation, alteration or repair of electrical systems which do not result in the removal of interior wall or ceiling finishes exposing the structure.*~~

R314.5 Interconnection. *Where more than one smoke alarm is required to be installed within an individual dwelling or sleeping unit, the smoke alarms shall be interconnected in such a manner that the activation of one alarm will activate all of the alarms in the individual unit. The alarm shall be clearly audible in all bedrooms over background noise levels with all intervening doors closed.*

Exceptions:

1. *Interconnection is not required in buildings that are not undergoing alterations, repairs or construction of any kind.*
2. *Smoke alarms in existing areas are not required to be interconnected where alterations or repairs do not result in the removal of interior wall or ceiling finishes exposing the structure, unless there is an attic, crawl space or basement available which could provide access for interconnection without the removal of interior finishes.*
3. ~~*Work involving*~~ *Smoke alarms are not required to be interconnected where repairs or alterations are limited to the exterior surfaces of dwellings, such as the replacement of roofing or siding, or the addition or replacement of windows or doors, or the addition of a porch or deck, are exempt from the requirements of this section.*
4. *Smoke alarms are not required to be interconnected when work is limited to the installation, alteration or repairs of plumbing or mechanical systems ~~are exempt from the requirements of this section~~ or the installation, alteration or repair of electrical systems which do not result in the removal of interior wall or ceiling finishes exposing the structure.*

Notation:

Authority: Health and Safety Code Sections 1250, 1569.72, 1569.78, 1568.02, 1502, 1597.44, 1597.45, 1597.46, 1597.54, 1597.65, 13108, 13108.5, 13114, 13143, 13143.2, 13143.6, 13146, 17921, 18949.2, Government Code Section 51189

References: Health and Safety Code Sections 13143, 17921, 18949.2, Government Code Sections 51176, 51177, 51178, 51179, Public Resources Code Sections 4201 through 4204

Rationale for modification:

The SFM is providing further modification to the above exceptions based on comments received during the 45-day comment period. The SFM agrees in keeping consistency between similar provisions. However, the SFM is not able to make all necessary revisions in this rulemaking and will work with the Department of Housing and Community in future rulemaking cycles to provide further consistency with the provisions for carbon monoxide alarms contained in the California Building and Residential Codes. (See below comments from the CALBO State Code Committee.)

CALBO State Code Committee comments:

While we believe the intent of these amendments are appropriate, we recommend the wording be consistent with the proposed HCD language in Section 315.1.3 exceptions 3 and 4.

The exceptions for smoke alarms and carbon monoxide alarms are the same and should therefore be written in the same format. We believe the proposed HCD language for section 315.1.3 exceptions 3 and 4 is more clear than that of the proposed SFM language for 314.4 exceptions 4 and 5. Ensuring this consistency is a primary function of the CBSC.

We appreciate and support the hard work of the Commission and the other State Agencies. In particular, we appreciate the ongoing effort to minimize changes to the model code documents. We respectfully request consideration of the modifications noted above.