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*Comment Received From: Thomas Culp  
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**NGA AEC comment on fire-rated fenestration**

See attached comment to improve the exception for fire-rated fenestration

*Additional submitted attachment is included below.*



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Docket number 24-BSTD-01

June 28, 2024

2025 Energy Code Rulemaking – 15 day language

Re: exception for fire-rated fenestration

Thank you for attempting to address the unique attributes fire-rated fenestration and how they intersect with the energy code. However, the proposed exemption in Sections 120.7, 150.0, and 160.1 does not match the proposed language we submitted in May (and also supported by WDMA and FGIA), and it only addresses part of the problem – in WUI fire-areas only. ***It does not address fire situations in normal non-WUI areas, such as an exception for fire-rated products in close lot-line conditions.***

Draft exception in 15-day language in 120.7, 150.0, and 160.1:

Exception to Section 120.7(d): Fenestration installed in buildings meeting Part 7 of the California Building Code, California Wildland-Urban Interface Code, and where the building is located in Fire Hazard Severity Zones or Wildland-Urban Interface (WUI) Fire Areas as designated by the local enforcement agency.

Previously suggested exception in 110.6:

Exception to Section 110.6 (a): Fire-resistance rated glazed walls, and windows and exterior doors that are required to comply with the provisions of The California Building Code Title 24 Part 2, Section 716 Opening Protectives.

We are supportive of the exception being in 120.7, 150.0, and 160.1 instead of 110.6, but believe it needs to be changed to address fire-rated conditions in non-WUI areas. To not lose the specifics of the WUI code, we suggest combining both exceptions for 120.7, 150.0, and 160.1:

**Exceptions:**

- 1) Fire-resistance rated glazed walls, and windows and exterior doors that are required to comply with the provisions of The California Building Code Title 24 Part 2, Section 716 Opening Protectives.
- 2) Fenestration installed in buildings meeting Part 7 of the California Building Code, California Wildland-Urban Interface Code, and where the building is located in Fire Hazard Severity Zones or Wildland-Urban Interface (WUI) Fire Areas as designated by the local enforcement agency.

We believe this would improve the code while preserving the intent of both the fire, WUI, and energy codes. Thank you again for the opportunity to comment, and please contact me with any questions.

Best regards,

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