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State of Hawaii
State Building Code Council
Department of Accounting and General Services
Office of the Comptroller
Kalanimoku Building
1151 Punchbowl Street
Honolulu, HI 96813

RE: Proposed Amendment to HI 2012 IBC Adoption

Dear Dr Gaur,

My name is Tien Peng, and I represent the National Ready Mixed Concrete Association (NRMCA). Thank you for the opportunity to submit this proposal to the Hawaii State Building Code Council. NRMCA is an industry association founded in 1930, and today represents an industry with more than 2,250 companies that employ more than 125,000 American workers who manufacture and deliver ready mixed concrete. The Association represents both national and local companies that operate in both congressional districts in the State of Hawaii.

Because of the relaxation in fire safety in provisions where sprinklers are present, the most egregious trade-off is one which will allow to increase in heights of a building limiting fire access and putting people in danger. NRMCA would like to propose a fire safety amendment in the 2012 code.

- a. **510.4 Parking beneath Group R.** "...the number of stories to be used in determining the minimum type of construction shall be measured from the ~~floor above such a parking area-~~ lowest grade of fire service access.

Reason statement: The number of stories used in determining the minimum type of construction for buildings, including "pedestal" or "podium" construction should be measured from the grade plane to meet the intent of the NFPA sprinkler system designed per 903.3.1.2 for R Occupancies.

Thank you and the members of the committee for your consideration.

Sincerely,
Tien Peng

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