Summary of Comments
Pertaining to SFM Wildfire Protection Building Standards
Provided to the
CBSC Building Fire Other Code Advisory Committee

AUGUST 10, 2009

CBC Sec.	Issue #	Committee Member Name / Participant Written Comment # & Name	BFO Committee Action
701A.3	I	L. Blaul: Concerned about large gazebo type structures >10' from building allowed under Exception # 1	provide OSFM w/ suggested code language
701A..5.2	II	L. Blaul: Vegetation management enforcement should not include "building official" as an acceptable method / just use "enforcing agency."	work w/ OSFM on ET revision for 45-day
x	III	L. Blaul: Why no provisions to protect from wildfire exposure to skylights?	question/observation
x	IV	A. Adelman: wildfire protection an important issue, needs SoCal input to code development.	question/observation
706A	V	L. Blaul: Proposed changes to eave vent requirements not an improvement, concerned about allowing 1/8th-inch as an exception.	Held for Further Study
706A	similar issues	**1A** R. Thornberry: Vents - Proposed revisions to all sections	"
706A	similar issues	**1B** R. Thornberry: Vents (same comments revised format)	"
706A.2 & .3	similar issues	**2A** B. Berkompas: Vent problem, 1/8th-inch, thru roof vents, & justification	"
703A.2	VI	**3A** C. Wagner: Standards of Quality / Evaluation Agencies	work w/ OSFM on ET revision for 45-day
703A.2	similar issue	**3B** J. Woestman: Standards of Quality / Evaluation Agencies	"
IRC	same in IRC	**3C** J. Woestman: Standards of Quality / Evaluation Agencies	"
703A.4	VII	**4A** J. Woestman: Standards of Quality Labelling	work w/ OSFM on ET revision for 45-day
IRC	same in IRC	**4B** J. Woestman: Standards of Quality Labelling	"
703A.5.1	VIII	**5A** J. Woestman: Standards of Quality Conditions of Use	work w/ OSFM on ET revision for 45-day
IRC	same in IRC	**5B** J. Woestman: Standards of Quality Conditions of Use	"

Vent Industry Task Group
2010 California Building Code
Proposed Revisions
to
Section 706A

8/7/09

Written Participation Comments
Pertaining to Wildfire Protection Building Standards
"CBC Ch7A" Comment # 1A
THORNBERRY
Submitted to the
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009
E. Foote OSFM

706A Vents.

706A.1 General. When provided, vents for enclosed attics, enclosed rafter spaces formed where ceilings are ~~applied directly to~~ located below the underside of the roof rafters, and underfloor ventilation shall be in accordance with section 1203 and this section. ~~to resist building ignition from~~ Such vents shall be protected by materials, devices, or assemblies designed and constructed to protect combustible materials forming the boundaries of, or contained within, the ventilated space against ignition caused by the intrusion of burning embers and flame into the space through the ventilation openings.

706A.2 General Requirements. Ventilation openings, other than those located in the underside of eaves and cornices, for enclosed attic spaces, enclosed rafter spaces formed where ceilings are ~~applied directly to~~ located below the underside of the roof rafters, and underfloor ventilation openings shall be protected with vents that resist the intrusion of flame and embers when accepted or approved by the enforcing agency or shall ~~fully covered with metal wire mesh, vents, or other materials that~~ meet the following requirements:

1. The vent openings shall be fully covered with a corrosion-resistant metal wire mesh.

2~~1~~. The size of the wire mesh openings ~~therein~~ covering the vent shall be a minimum of 1/16th inch (1.6 mm) and shall not exceed 1/8th inch (3.2mm).

3~~2~~. The materials ~~or~~ used in the construction of the vent shall be of corrosion-resistant noncombustible material.

706A.3 Ventilation openings ~~on~~ in the Underside of Eaves and Cornices: ~~Vents shall not be installed on~~ Ventilation openings for attic spaces and enclosed roof rafter spaces located in the underside of eaves and cornices shall be protected in accordance with Section 706A.4.

706A.4 Approved Alternatives. Materials, devices, or assemblies designed and constructed to comply with Section 706A.1 shall be permitted to protect ventilation openings when approved based on approved tests conducted by a testing agency approved by the State Fire Marshal to demonstrate compliance with Section 706A.1.

~~**Exceptions:**~~

~~1. The attic space being ventilated is fully protected by an automatic sprinkler system installed in accordance with section 903.3.1.1.~~

~~2. Vents which comply with requirements of this section may be installed on the underside of eaves when the exterior wall covering and exposed underside of the eave are of noncombustible material or Ignition-resistant material in accordance with Section 707A.3 and SFM 12-7A-5 "Ignition-resistant building material.~~

~~3. The enforcing agency may accept or approve special eave and cornice vents that resist the intrusion of flame and burning embers.~~

Vent Industry Task Group
2010 California Building Code
Proposed Revisions
to
Section 706A Vents
"Clean" Ver

8/7/09

Written Participation Comments
Pertaining to Wildfire Protection Building Standards
"CBC Ch7A" Comment # 1 B
THORNBERRY
Submitted to the
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009
E. Foote OSFM

706A Vents.

706A.1 General. When provided, vents for enclosed attics, enclosed rafter spaces formed where ceilings are located below the underside of the roof rafters, and underfloor ventilation shall be in accordance with section 1203 and this section. Such vents shall be protected by materials, devices, or assemblies designed and constructed to protect combustible materials forming the boundaries of, or contained within, the ventilated space against ignition caused by the intrusion of burning embers and flame into the space through the ventilation openings.

706A.2 General Requirements. Ventilation openings, other than those located in the underside of eaves and cornices, for enclosed attic spaces, enclosed rafter spaces formed where ceilings are located below the underside of the roof rafters, and underfloor ventilation openings shall be protected with vents that resist the intrusion of flame and embers when accepted or approved by the enforcing agency or shall meet the following requirements:

1. The vent openings shall be fully covered with a corrosion-resistant metal wire mesh.

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2. The size of the wire mesh openings covering the vent shall be a minimum of 1/16th inch (1.6 mm) and shall not exceed 1/8th inch (3.2mm).
3. The materials used in the construction of the vent shall be of corrosion-resistant noncombustible material.

706A.3 Ventilation openings in the Underside of Eaves and Cornices: Ventilation openings for attic spaces and enclosed roof rafter spaces located in the underside of eaves and cornices shall be protected in accordance with Section 706A.4.

706A.4 Approved Alternatives. Materials, devices, or assemblies designed and constructed to comply with Section 706A.1 shall be permitted to protect ventilation openings when approved based on approved tests conducted by a testing agency approved by the State Fire Marshal to demonstrate compliance with Section 706A.1.

Ventilation Safety

"You must have both," says state Fire Marshal Kate Dargan. "For existing construction, if we could change the roofing and the vents and defensible space, those homes will have a likelihood of survival in the 90%-plus range." LA Times, 2007

Written Participation Comments
Pertaining to Wildfire Protection Building Standards
"CBC Ch7A" Comment # 2 B
Submitted to the BERKOMPAS
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SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009
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5

History

2003 Wildfires

- Over 5000 structures destroyed
- 253 Million dollars spent by the state for fire suppression

2007 Wildfires

- Over 2000 structures destroyed
- 500,000 acres destroyed!
- 7 deaths, 100 injuries

The Blue Ribbon Commission is Formed

Updating local building and planning regulations to include more stringent construction standards for high fire threat zones, requirements for brush clearance and fuel modification, and land use planning techniques that protect property.

California Chapter 7 A Code

- *704A.2 Attic ventilation.*

- *704A.2.1 General. When required by Chapter 15, roof and attic vents shall resist the intrusion of flame and embers into the attic area of the structure, or shall be protected by corrosion-resistant, noncombustible wire mesh with 1/4-inch (6 mm) openings or its equivalent.*

- *704A.2.2 Eave or cornice vents. Vents shall not be installed in eaves and cornices.*

- *Exception: Eave and cornice vents may be used provided they resist the intrusion of flame and burning embers into the attic area of the structure.*

The Problem

- Conventional 1/8 screen mesh vent designs do nothing to protect our structures from wildfires

- "Remember, too, that vents provide the perfect opening for a firebrand."
  Jack Cohen How Homes Ignite

- Embers threaten structures well before the head of the fire arrives as well as long after it has passed

The Problem cont.

- What you should know: IBHS researchers have learned from post-fire surveys of buildings damaged and destroyed by wildfires that attic/roof vents are vulnerable entry points for embers and flames. Among the most vulnerable are vents in the eave and soffit areas.

"Majority of homes lost in Witch fire burned by flying embers."
Associated Press, 12/23/2007

"Senior fire officials estimate that well over 75% of the destroyed homes had fire-resistant exteriors."
Los Angeles Times, 12/23/2007

FEMA Study

Key Issues

Embers and hot gases can be blown or pulled • into vent openings and enter attic spaces, crawlspaces, and ductwork, leading to ignition of the interior of the building (see Figure 2).

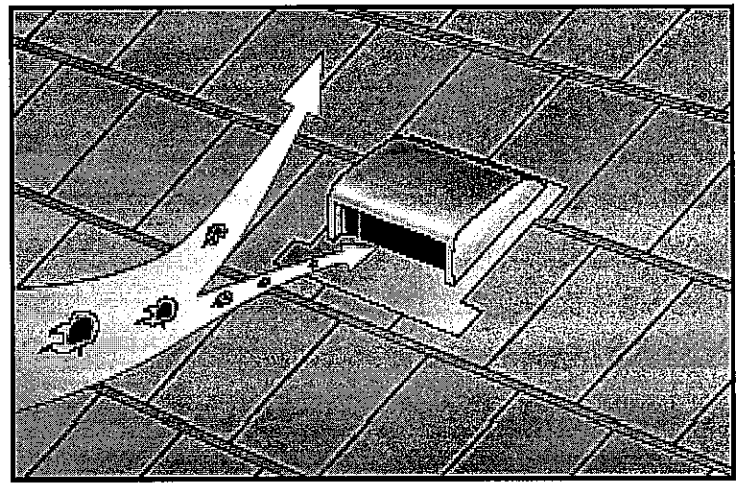
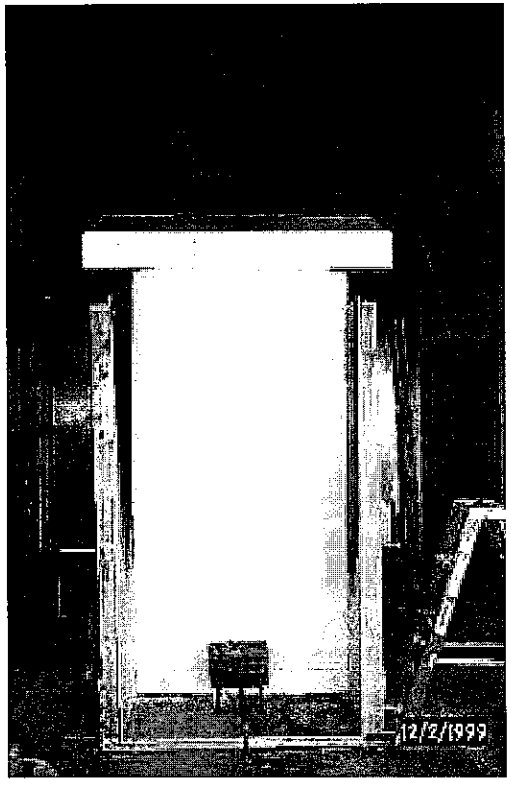


Figure 2. Embers or hot gases can be blown or pulled into vents.

Vents

FEMA

Conventional Vent Test



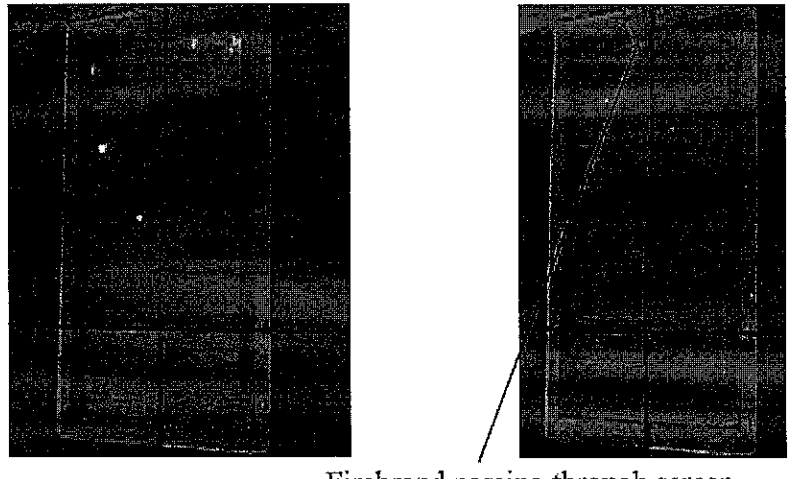
12

NIST MESH TEST RESULTS 2007

NIST: NATIONAL INSTITUTE OF STANDARDS AND TESTING

- MESH IS NOT ENOUGH!-

- ***"The firebrands were not quenched by the presence 1/8" screen and would continue to burn until they were small enough to fit through the screen opening. <u>For all screen sizes tested</u>, the firebrands were observed to penetrate the screen and produce a self-sustaining, smoldering ignition inside the paper beds installed inside the structure."***



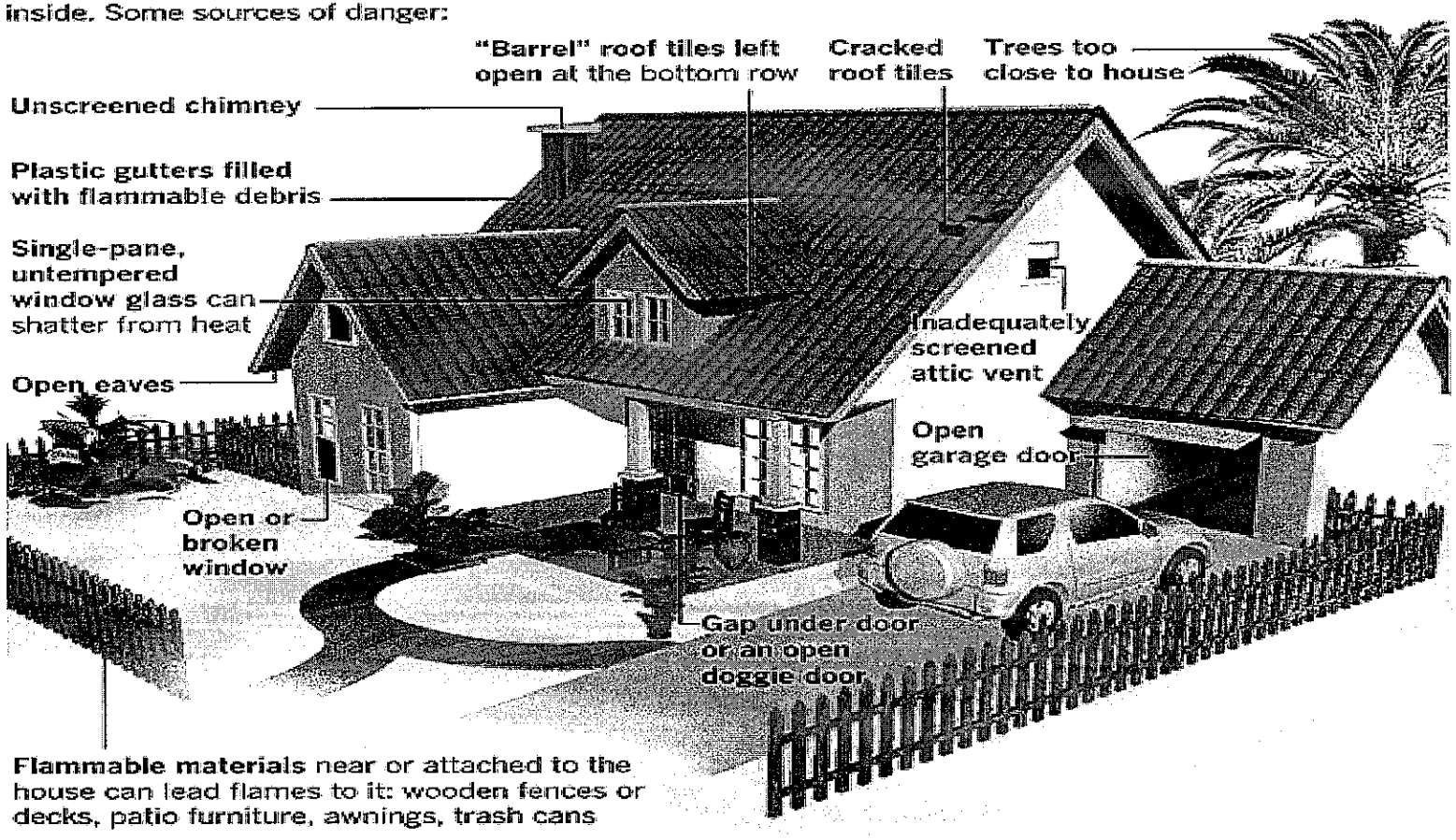
Firebrand passing through screen

(a) (b)

Current Building Standards are not Enough

Even fire-resistant homes can burn

Building with stucco and tile and clearing nearby brush aren't enough to protect a home from wildfires. A hail of wind-driven embers can penetrate even a fire-resistant structure and burn from the inside. Some sources of danger:



Note: For more information, visit disastersafety.org/publications

Source: Times reporting. Graphics reporting by Ted Rohrlich, Joe Mozingo and Rong-Gong Lin II

Lorena Iñiguez Los Angeles Times

OCFA After Action Report tor the 2008 Freeway Complex Fire

Homes must be constructed to withstand ignition from embers that land on homes or enter through attics and other openings.

Houses with unprotected vents and other openings became vulnerable to ember intrusion. Raging winds turned burning fuel into an "ember-storm," threatening at-risk homes in the fire's path.

A home "has to have a weakness for it to burn," said Ernylee Chamlee, California's chief of wildland fire prevention engineering. "It's less random, or a case of luck, than you might think."

. "If we're to continue to build in the wild-land/urban interface, we need to provide good tools for structure protection and survivability." said Hoover

THE PROBLEMS WITH THE CURRENT DRAFT

706A Vents.

706A.1 General. When provided, vents for enclosed attics, enclosed rafter spaces formed where ceilings are applied directly to the underside of roof rafters, and underfloor ventilation shall be in accordance with section 1203 and this section to resist building ignition from the intrusion of burning embers and flame through the ventilation openings.

706A.2 Requirements. Ventilation openings for enclosed attic spaces, enclosed rafter spaces formed where ceilings are applied directly to the underside of roof rafters, and underfloor ventilation openings **shall be fully covered with metal wire mesh, vents, or other materials that meet the following requirements:**

1. The size of openings therein shall be a minimum of 1/16th inch (1.6 mm) and shall not exceed 1/8th inch (3.2mm).
2. The material or vent shall be of noncombustible material.

706A.3 Ventilation openings on the Underside of Eaves and Cornices: Vents shall not be installed on the underside of eaves and cornices.

Exceptions:

1. The attic space being ventilated is fully protected by an automatic sprinkler system installed in accordance with section 903.3.1.1.
2. **Vents which comply with requirements of this section may be installed on the underside of eaves when the exterior wall covering and exposed underside of the eave are of noncombustible material or Ignition-resistant material in accordance with Section 707A.3.**
3. The enforcing agency may accept or approve special eave and cornice vents that resist the intrusion of flame and burning embers.

Why The Change?

- Why the change to allow 1/8" mesh in the face of so much data that shows it does nothing to protect against flames and embers?
- Why doesn't he current document address through roof and other exterior wall vents?
- What data was used to justify the change to the code language?

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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Written Participation Comments
Pertaining to Wildfire Protection Building Standards

"CBC Ch7A" Comment # 3A

Submitted to the WAGNER
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009

E. Foote OSFM

PARTICIPATION COMMENTS
Written comments are to be sent to the above address in advance of a Code Advisory Committee meeting.

WRITTEN COMMENT DEADLINE: Aug. 6, 2009

☐ **BFO COMMITTEE.....AUGUST 10 &11, 2009**

Date: 08/06/09

From: Craig H. Wagner, PE
Name (Print or type)

Digitally Signed by: Craig H. Wagner
(Signature)

ATI Evaluation Service (Div of Architectural Testing, Inc.)
Agency, jurisdiction, chapter, company, association, individual, etc.

130 Derry Court	York	PA	17406
Street	City	State	Zip

We do not agree with:

[SFM 03/09 – 2009 IBC] The Agency proposed modifications As Submitted on Section No. 703A.2

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

703A.2 Qualification by Testing. *Material and material assemblies tested in accordance with the requirements of section 703A shall be accepted for use when the results and conditions of those tests are met. Material and material assemblies approved and listed by the State Fire Marshal or identified ~~in a current ICC-ES/ICBO-ES report~~ as compliant with this chapter in a current report issued by an approved Evaluation Agency shall be acceptable. Approved Evaluation Agencies shall be accredited in accordance with ISO/IEC Guide 65 for product certification programs. The scope of accredition for the approved agency shall include building product compliance with code.*

STATE OF CALIFORNIA
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Written Participation Comments
Pertaining to Wildfire Protection Building Standards

"CBC Ch7A" Comment # 3B

Submitted to the WOESTMAN
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009

E. Foote OSFM

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WRITTEN COMMENT DEADLINE: Aug. 6, 2009

☒ **BFO COMMITTEE.....AUGUST 10 &11, 2009**

Date: August 6, 2009

From: John Woestman (Signature)
Name (Print or type)

Composite Lumber Manufacturers Association (CLMA)
Agency, jurisdiction, chapter, company, association, individual, etc.

750 National Press Building, 529 14th Street, N.W., Washington, DC 20045
Street City State Zip

We do not agree with:

[X] The Agency proposed modifications As Submitted on Section No. **703A.2, Part 2**

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

703A.2 Qualification by Testing. Material and material assemblies tested in accordance with the requirements of section 703A shall be accepted for use when the results and conditions of those tests are met. Material and material assemblies shall be acceptable when approved and listed by the State Fire Marshal or identified ~~in a current ICC-ES/ICBO-ES report as compliant with this chapter shall be acceptable~~ as compliant with this chapter in a current report issued by an approved product evaluation agency.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Proposed revisions are consistent with language currently in this chapter: testing and listing agencies are not prescriptively

STATE OF CALIFORNIA
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Written Participation Comments
Pertaining to Wildfire Protection Building Standards

"CBC Ch7A" Comment # 3C

Submitted to the WOESTMAN
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009

E. Foote OSFM

PARTICIPATION C...
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WRITTEN COMMENT DEADLINE: Aug. 6, 2009

☒ **BFO COMMITTEE.....AUGUST 10 &11, 2009**

Date: August 6, 2009

From: John Woestman
Name (Print or type)

(Signature)

Composite Lumber Manufacturers Association (CLMA)
Agency, jurisdiction, chapter, company, association, individual, etc.

750 National Press Building, 529 14th Street, N.W., Washington, DC 20045
Street City State Zip

We do not agree with:

[X] The Agency proposed modifications As Submitted on Section No. **R327.3.2 and R202, Part 2.5**

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

R327.3.2 Qualification by testing. Material and material assemblies tested in accordance with the requirements of Section R327.3.2 shall be accepted for use when the results and conditions of those tests are met. Material and material assemblies shall be acceptable when approved and listed by the State Fire Marshal or identified ~~in a current ICC-ES/ICBO-ES report as compliant with this chapter shall be acceptable~~ as compliant with this chapter in a current report issued by an approved product evaluation agency.

Add definition to CRC Chapter 2, Section 202, if a definition is needed:
APPROVED PRODUCT EVALUATION AGENCY. "Approved Product Evaluation Agency" is any agency approved by the enforcing agency, unless otherwise provided by statute, which is in the business of evaluating building products and which makes available published reports of such evaluations in which specific information is included that a specific building product has been evaluated to recognized building code requirements and found to comply.

STATE OF CALIFORNIA
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Written Participation Comments
Pertaining to Wildfire Protection Building Standards
"CBC Ch7A" Comment # 4A
WOESTMAN
Submitted to the
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009
E. Foote OSFM

PARTICIPAT
Written comments are to be sent to the above address in advance of a Code Advisory Committee meeting.

WRITTEN COMMENT DEADLINE: Aug. 6, 2009

☒ **BFO COMMITTEE.....AUGUST 10 &11, 2009**

Date: August 6, 2009

From: John Woestman
Name (Print or type)

(Signature)

Composite Lumber Manufacturers Association (CLMA)
Agency, jurisdiction, chapter, company, association, individual, etc.

750 National Press Building, 529 14th Street, N.W., Washington, DC 20045
Street City State Zip

We do not agree with:

[X] The Agency proposed modifications As Submitted on Section No. **703A.4, Part 2**

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

703A.4 Labeling. Material and material assemblies tested in accordance with the requirements of section 703A shall bear an identification label showing the fire test results. That identification label shall be issued by a testing and/or inspecting agency approved by the State Fire Marshal.
1. Identification mark of the approved testing and/or inspecting agency.
2. Contact and identification information of the manufacturer.
3. Model number or identification of the product or material.
4. Pre-test weathering (~~if any~~ where required by this chapter).
5. Compliance standard as described under Section 703A.7.

STATE OF CALIFORNIA
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Written Participation Comments
Pertaining to Wildfire Protection Building Standards

"CBC Ch7A" Comment # 4B WOESSMAN

Submitted to the
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
10:00 A.M. AUGUST 10, 2009

E. Foote OSFM

PARTICIPATIC
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WRITTEN COMMENT DEADLINE: Aug. 6, 2009

☒ **BFO COMMITTEE.....AUGUST 10 &11, 2009**

Date: August 6, 2009

From: John Woestman
Name (Print or type)

(Signature)

Composite Lumber Manufacturers Association (CLMA)
Agency, jurisdiction, chapter, company, association, individual, etc.

750 National Press Building, 529 14th Street, N.W., Washington, DC 20045
Street City State Zip

We do not agree with:

[X] The Agency proposed modifications As Submitted on Section No. **R327.3.4, Part 2.5**

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

R327.3.4 Labeling. Material and material assemblies tested in accordance with the requirements of section R327.3 shall bear an identification label showing the fire test results. That identification label shall be issued by a testing and/or inspecting agency approved by the State Fire Marshal.
1. Identification mark of the approved testing and/or inspecting agency.
2. Contact and identification information of the manufacturer.
3. Model number or identification of the product or material.
4. Pre-test weathering (~~if any~~ where required by this chapter).
5. Compliance standard as described under Section R327.3.7.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

STATE OF CALIFORNIA
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Written Participation Comments
Pertaining to Wildfire Protection Building Standards

"CBC Ch7A" Comment # 5A

Submitted to the WOESTMAN
CBSC Building Fire & Other Code Advisory Committee
2525 NATOMAS PARK DRIVE, COUNCIL RM. SUITE 120
SACRAMENTO, CA 95833
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WRITTEN COMMENT DEADLINE: Aug. 6, 2009

☒ **BFO COMMITTEE.....AUGUST 10 &11, 2009**

Date: August 6, 2009

From: John Woestman
Name (Print or type)

(Signature)

Composite Lumber Manufacturers Association (CLMA)
Agency, jurisdiction, chapter, company, association, individual, etc.

750 National Press Building, 529 14th Street, N.W., Washington, DC 20045
Street City State Zip

We do not agree with:

[X] The Agency proposed modifications As Submitted on Section No. **703A.5.1, Part 2**

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

703A.5.1 General. Material and material assemblies tested in accordance with the requirements of section 703A shall maintain their fire test performance under conditions of use where installed in accordance with the manufacturer's instructions.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The undefined and unbounded term "conditions of use" could be interpreted to require performance in uses far outside the scope of the manufacturer's intended use of the product. Qualifying "conditions of use" with what the manufacturer states in its installation instructions clarifies the use of the product to applications intended by the manufacturer.
This proposed modification to the SFM Express Terms reduces the ambiguity of this section of the CBC (Item 6 of Health and Safety Code §18930).

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Written Participation Comments
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"CBC Ch7A" Comment # 5B

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Date: August 6, 2009

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750 National Press Building, 529 14th Street, N.W., Washington, DC 20045
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We do not agree with:

[X] The Agency proposed modifications As Submitted on Section No. **R327.3.5.1, Part 2.5**

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

R327.3.5.1 General. Material and material assemblies tested in accordance with the requirements of section R327.3 shall maintain their fire test performance under conditions of use where installed in accordance with the manufacturer's instructions.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

The undefined and unbounded term "conditions of use" could be interpreted to require performance in uses far outside the scope of the manufacturer's intended use of the product. Qualifying "conditions of use" with what the manufacturer states in its installation instructions clarifies the use of the product to applications intended by the manufacturer.
This proposed modification to the SFM Express Terms reduces the ambiguity of this section of the CBC (Item 6 of Health and Safety Code §18930).

Foote, Ethan

From: Foote, Ethan
Sent: Wednesday, August 12, 2009 1:03 PM
To: 'Woestman, John'
Subject: RE: Notes from Monday BFO

From: Woestman, John [mailto:JWoestman@kellencompany.com]
Sent: Wednesday, August 12, 2009 12:26 PM
To: Foote, Ethan
Subject: FW: Notes from Monday BFO

Ethan,
Here's that language.

Thanks much for the email, and the opportunity to offer comments and perhaps offer revisions. Following-up on the discussions at the BFO CAC meetings, I'm offering a few comments and draft language. For brevity, I'm not repeating all the comments we submitted with the written comments last week and am attaching those written comments.

John Woestman
Codes and Standards
Composite Lumber Manufacturers Association
750 National Press Building
529 14th Street, N.W.
Washington, DC 20045
515-422-6027 (direct)

703A2 – Standards of Quality / Evaluation Agencies

Two language alternatives offered. The first is the same as CLMA's written comment. The second adds criteria for the product evaluation agencies with text very similar to that proposed by Craig Wagner.

703A.2 Qualification by Testing. Material and material assemblies tested in accordance with the requirements of section 703A shall be accepted for use when the results and conditions of those tests are met. Material and material assemblies shall be acceptable when approved and listed by the State Fire Marshal or identified ~~in a current ICC-ES/ICBO-ES report as compliant with this chapter shall be acceptable~~ as compliant with this chapter in a current report issued by an approved product evaluation agency.

Or

703A.2 Qualification by Testing. Material and material assemblies tested in accordance with the requirements of section 703A shall be accepted for use when the results and conditions of those tests are met. Material and material assemblies shall be acceptable when approved and listed by the State Fire Marshal or identified ~~in a current ICC-ES/ICBO-ES report as compliant with this chapter shall be acceptable~~ as compliant with this chapter in a current report issued by an approved product evaluation agency. Approved product evaluation agencies shall be accredited in accordance with ISO/IEC Guide 65 for product certification programs. The scope of accreditation for the product evaluation agency shall include building product compliance with code.

703A.4 – Standards of Quality / Labeling

Revising the language as CLMA suggested includes the weathering required by section 703A.5, which includes weathering of ASTM D2898 and Section 2303.2 (because of the references in 703A.5.2.1) and in Title 19 of the CCR (because of the reference in 703A.5.2.2).

Alternative language is offered that may be less restrictive, but far less ambiguous than "if any".

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703A.4 Labeling. Material and material assemblies tested in accordance with the requirements of section 703A shall bear an identification label showing the fire test results. That identification label shall be issued by a testing and/or inspecting agency approved by the State Fire Marshal.

1. Identification mark of the approved testing and/or inspecting agency.
2. Contact and identification information of the manufacturer.
3. Model number or identification of the product or material.
4. Pre-test weathering (~~if any~~ where required by this chapter).
5. Compliance standard as described under Section 703A.7.

OR alternative language for 703A.4.4: Pre-test weathering (~~if any~~ where required).

703A.5.1 – Standards of Quality / Conditions of Use

CLMA members are very supportive that products are to be expected to perform under their intended "conditions of use". The most significant concern is that the current language is wide open, and could allow a basis for claiming that the product must maintain its fire performance for any use of the product – even use of the product far outside the scope of the product's intended use.

CLMA members prefer language that clearly limits the scope of "conditions of use" to what the manufacturer communicates in the manufacturer's literature (as proposed by CLMA). However, I note that the current CA building code is not that specific where "conditions of use" are used in the CBC. Perhaps a simpler revision may be better than the current language:

703A.5.1 General. Material and material assemblies tested in accordance with the requirements of section 703A used in accordance with their intended use shall maintain their fire test performance under conditions of use.