



December 9th, 2009

Mr. David Walls, Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: November 24, 2009 Notice of 15-Day Public Comment Period for Proposed Building Standards of the Office of the State Fire Marshal (SFM)

Dear Mr. Walls:

Brandguard Vents has received and reviewed the Notices, express terms and rationales for a 15-day comment period for the 2009 Code Adoption Cycle put forth by Mr. Reinertson on November 24, 2009. It is evident that there has been much thought and consideration put into the modified code language which will ultimately result in a stronger building code and greater safety for the homeowner and First Responders. Brandguard Vents greatly appreciates the consideration given to the public comments submitted by itself and also by the FVSA.

In relation to the ignition of a structure from a WUI fire, it is true that a system is only as good as its weakest link; however we feel it is important that the vents are not that weak point in the system, and this adjustment in the code language helps insure that they will not be.

It is understood that the Chapter 7A building codes can only help reduce, not eliminate disastrous conflagration losses. It has been the goal of Brandguard Vents all along simply to maintain the strength of the 2007 building code relating to venting. With that goal in mind, the eave and soffit vent requirements are now much more comparable to the 2007 version. Regarding roof and gable venting, Brandguard Vents respectfully requests that there be (at least) a suggestion of vents that "resist the intrusion of flames and embers" under 706A.2, but keeping the alternate "mesh" solution in place as the 2007 code did (see 2007: 704A.2.1). We feel it's important to have this in there so that progress can continue to be made towards improving these vents as well. Without mention of it as an alternative in the code, it will make it more difficult.

It is also important to note that the ASTM E05.14 subcommittee is very close to adopting the currently proposed procedure on testing a vent for fire and ember safety (see ASTM WK21343). It is expected to be formally adopted by the June, 2010 meeting in West Conshohocken, PA. This will provide a solid frame of reference for the SFM and the CBSC in future code cycles. FVSA will keep the California State Fire Marshal's Office updated on the process and we look forward to working with them at the conclusion of this process.

Members: Brandguard Vents • O'Hagin's Inc • Vivico LLC • Vulcan Technologies

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We are pleased to continue to work with the California State Fire Marshal's Office on this important topic. Please feel free to contact us or our representative in Sacramento, Ms. Kathryn Lynch, at (916) 838-6600 or (916) 443-0202.

Sincerely,

Kelly Berkompas
President

cc: Tonya Hoover, Acting California State Fire Marshal
Ben Ho, Chief, Fire Engineering Division
Kevin Reinertson, Acting Division Chief, Code Development & Analysis
Ethan Foote, Assistant Chief, Wildfire Protection Building Construction
Kathryn Lynch, Advocate, Fire Vents Safety Association

FAX COVER SHEET

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| TO | Kevin Reinertson |
| COMPANY | |
| FAX NUMBER | 19164458459 |
| FROM | Kelly Berkompas |
| DATE | 2009-12-10 16:44:20 GMT |
| RE | Brandguard Vents 15 day Public Comments |

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