



Exclusive Manufacturer of the Vulcan Vent®

The Fire & Ember Safe Vent
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December 7, 2009,

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

Dear Mr. Walls:

Gunter Manufacturing has reviewed the Notices, express terms and rationales for a 15-day comment period for the 2009 Code Adoption Cycle written by Mr. Reinertson on November 24, 2009. The minimum eave height language regarding eave and soffit vents is a unique approach to resolving what we had considered a gap in fire safety. It is apparent that much time and consideration has been given to this code language and that effort is greatly appreciated and respected by our company.

We understand that is it the position by some in the SFM that 1/8" mesh is sufficient to provide protection from ember penetration, given what it sees as a lack of evidence to show otherwise. It is our hope that in the future, this will be examined more closely. That aside, the currently proposed language will most assuredly be beneficial to the homeowner providing greater fire safety than the 2010 vent language previously suggested.

It has been the desire of Gunter Manufacturing Inc to maintain the high standard set by the 2007 WUI building codes and Blue Ribbon Commission. This currently proposed language appears to help accomplish that goal.

We are in agreement with the FVSA that regarding roof and gable venting, there should 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). This slight adjustment would not hinder construction in the least, maintain the 2007 code strength and provide local jurisdictions the ability to increase safety in their areas. Regardless of this suggestion, we do support the current 15-day language with respect to venting and look forward to working with the SFM and the CBSC in the future on code development issues.

Thank you for your consideration.

Sincerely,

Larry Dumm
President
Gunter Mfg. Inc.

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